

## Privacy Policy

RTCLab Sp. z o.o. (hereinafter referred to as 'The Website Owner'), the owner of the website <https://www.html5meeting.com> (hereinafter referred to as 'The Website') operates with the greatest respect for its users and ensures protection of their rights with particular regard to any data or information which are recorded or read on the terminal device.

We have created this Privacy Policy in order to detail and show the principles and mechanisms of collection and processing of data.

The Website Owner collects personal data and other various data. Depending on the type of data collection takes place at the user's request or automatically.

**Dear User, by using this Website in any manner you accept the principles included in this Privacy Policy.**

**Information note regarding provisions of the Regulation of the European Parliament and of the Council (UE) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation - GDPR).**

**The Controller of your personal data specified above is** RTCLab Sp. z o.o. with its registered seat in Gdańsk at al. Grunwaldzka 212, 80-266 Gdańsk, Poland, entered into the register of entrepreneurs of the National Court Register by District Court Gdańsk-Północ in Gdańsk, VII Commercial Department of National Court Register, under no. KRS 0000613170, with share capital in amount of 50,000 PLN, NIP (Tax Identification Number): 5842748894.

Personal data is processed on the basis of the provisions of the REGULATION OF THE EUROPEAN PARLIAMENT AND THE COUNCIL (UE) 2016/679 of 27 April 2016 (hereinafter referred to as **GDPR**), and also other provisions of Polish law.

Data protection supervisor in the company of the Controller is available at the correspondence address RTCLab Sp. z o.o., al. Grunwaldzka 212, 80-266 Gdańsk, Poland, and also at the e-mail address [dpo@rtclab.com](mailto:dpo@rtclab.com).

Capitalized terms have the meaning specified in the Terms of Service of the Website which is available here [\[link\]](#), to the extent in which they are therein defined.

**In order to perform obligations arising from GDPR the Controller provides hereby the following information on processing of your personal data:**

1. Processing of the following categories of your personal data:
  - 1) E-mail;
  - 2) Password;
  - 3) Nickname;

- 4) Name and Surname;
- 5) Telephone number;
- 6) Country, street, city, state/region;
- 7) Companies' name;
- 8) Time zone;
- 9) Time and date format;
- 10) Profile picture;
- 11) Information note;
- 12) IP address;
- 13) Log-in sheet;
- 14) History of password changes;
- 15) History of changes of service package;
- 16) Settings of external data storage;
- 17) Settings of system limits;
- 18) Operating System;
- 19) Name and version of the Browser;
- 20) Type of device;
- 21) Date and hour of entry and exit to and from a meeting;
- 22) Role of a participant of a meeting;
- 23) Activity of a browser tab;
- 24) Establishing connection;
- 25) Connection summary;
- 26) Problem with connection;
- 27) Responses to requests;
- 28) Action confirming participation in a meeting and lack of this action;
- 29) Commencement and ending of transmitting;
- 30) Establishing connection and its summary;
- 31) Problem with connection;
- 32) Start playback of a video;
- 33) Stop playback of a video;
- 34) Change of playback position;
- 35) Ending of playback of a video;
- 36) Start slideshow;
- 37) Change of slide;
- 38) Ending of slideshow;
- 39) Start file viewer.

is necessary to perform the Website use agreement with regard to standard functionalities reserved for the Registered Users concluded by and between you and the Controller (Article 6(1) point (b) of GDPR) and for this purpose the data is processed.

2. Processing of the following categories of your personal data:

- 1) Name and surname
- 2) Address where business is conducted

- 3) NIP [Tax Identification Number]
- 4) REGON [Statistical Identification Number]
- 5) E-mail address
- 6) Telephone number

is necessary to perform legal obligations (Article 6(1) point (c) of GDPR) of the Controller in the area of accounting and taxes.

3. The categories of your personal data specified in points 1 and 2 above are transferred to other entities for purposes necessary for their processing in accordance with the purpose of processing declared by the Controller or in accordance with your instruction. The recipients to which we transfer your data are AMAZON WEB SERVICES INC. in USA with regard to use the Website in relation to standard functionalities reserved for the Registered Users, and the cooperating accountancy company, for accounting and tax purposes.
4. The Collector intends to transfer the categories of your personal data specified in points 1 and 2 above to the United States of America (USA). This country provides the appropriate standards of protection and security of your personal data, which is confirmed by the European Commission in so-called Privacy Shield.
5. The Controller processes your personal data specified:
  - 1) in point 1 above until execution or termination of the Website use agreement with regard to standard functionalities reserved for the Registered Users;
  - 2) in point 2 above until cessation of tax obligations (6 years as of the tax year end) or cessation of legal claims against you or ones of yours against the Collector, and which are related to the Website use agreement with regard to standard functionalities reserved for the Registered Users.
6. You have the right to demand from the Controller to have an access to the personal data related to you, its rectification, erasure or restriction of its processing, to object to processing, and also the right to transfer the data.
7. You have the right to lodge a complaint against the Controller or activities related to processing of your personal data with supervisory authority, in particular in a member state of the European Union of your habitual residence, your place of work or place where alleged breach has taken place, if you believe that processing of your personal data breaches the provisions of GDPR. In Poland the mentioned authority is the President of the Office of Personal Data Protection.
8. Providing personal data is voluntary. The consequences of not providing data specified in points 1 and 2 focus on impossibility of performance of the Website use agreement with regard to standard functionalities reserved for the Registered Users.

**(more about your rights at the end of this document)**

You have right to object at any time – due to reasons related to your particular situation – to processing of personal data related to you based on your consent or legally justified interest of the Controller (see information above), including profiling. **In case of such an objection to the Controller, your personal data is no longer allowed to be processed, unless the Controller proves that there are important and legally justified grounds to process, overriding your interests, rights and freedoms, or proves that there are grounds to establish, exercise or defend legal claims.**

If your data is processed in accordance with the information above for purpose of direct marketing, you have the right, at any time, to object to processing of your personal data for purposes of such a marketing, including profiling, to the extent that processing is related to such a direct marketing. **In case of such an objection to the Controller your personal data is no longer allowed to be processed for such purposes.**

**You may object in any manner, in writing, by e-mail or by telephone using data of the Controller specified at the beginning of this document.**

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**Your Rights towards the Controller of Personal Data (hereinafter referred to as the Controller) as the data subject are as follows:**

**Right of access to data:** Article 15 of GDPR. You have the right to obtain your data processed by the Controller (the Controller shall provide to you the copy of the data being subject to processing with fee regulated by GDPR as an option) and the information related to: the purpose of processing, categories of personal data concerned; the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in the third country or international organization; security related to transfer; where possible, the envisaged period for which the personal data will be stored, or, if it is not possible, the criteria used to determine such a period; the right to request from the Controller rectification or erasure of personal data or restriction of processing of personal data or to object to such processing; the right to lodge a complaint with a supervisory authority; where the personal data is not collected from you, any available information as to its source; automated decision-making, including profiling and principles of how they are made, as well as the significance and the envisaged consequences of such processing for you.

**Right to rectification:** Article 16 of GDPR. You have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

**Right to erasure, so-called right to be forgotten:** Article 17 of GDPR. You have the right to obtain from the Controller the erasure of your personal data without undue delay where one of the following grounds applies: the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; the data owner withdraws consent on which the processing is based and where there is no other legal ground for the processing; you object to processing and there are no overriding legitimate grounds for the processing in cases other than direct marketing; the personal data has been unlawfully processed; the personal data has to be erased for compliance with a legal obligation in European Union or member state law to which the Controller is subject; the personal data has been collected in relation to the

offer of information society services. However, the law specified above shall not apply to the extent that the processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation which requires processing by European Union or member state law to which the Controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller; for reasons of public interest in the area of public health; for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right referred to above is likely to render impossible or seriously impair the achievement of the objectives of that processing; for establishment, exercise or defence of legal claims.

**Right to restriction of processing:** Article 18 of GDPR. You have the right to obtain from the Controller restriction of processing where one of the following applies: the accuracy of the personal data is contested by you - for a period enabling the Controller to verify the accuracy of this personal data; the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead; the Controller no longer needs the personal data for purposes of the processing, but it is required by you for establishment, exercise or defence of legal claims; the owner of data has objected to processing - pending the verification whether the legitimate grounds of the Controller override grounds of complaint of the person to whom data is related to, except for processing for purposes of direct marketing. Where processing has been restricted, such a personal data shall, with exception of storage, only be processed with your consent or for establishment, exercise or defence of legal claims or for protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or a member state.

**Right to data portability:** Article 20 of GDPR. You have the right to receive your personal data, which you have provided to the Controller, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without hindrance from the Controller, where: the processing is based on consent or on a contract, and the processing is carried out by automated means. You have the right to have the personal data transmitted directly from the Controller to another controller, where technically feasible.

**Right to object to data processing:** The information about these rights was included by the Controller in the box below the main information, above.

**You may exercise these rights in any manner, including by e-mail to the address [support@html5meeting.com](mailto:support@html5meeting.com), by mail to the address of the Controller specified at the beginning of this document.**

Data collected during registration.

If you wish to use some of the functions on our Website which are reserved for the Registered Users you must register for this purpose (sign up). During registration we will ask you to provide your personal data as well as additional data which may not constitute personal data but is also covered by this Policy. Providing personal data and consent to its processing is not mandatory (it is voluntary), however it is necessary to conclude and perform the Website use agreement in relation to functionalities reserved for the Registered Users.

Personal data is processed by the Website Owner acting as the controller of personal data for the purpose and in a manner specified above in the information note.

Data collected when contacting us

When you contact us in order to perform a given activity (e.g. to lodge a complaint) via the Website, telephone or e-mail, we will again require from you to provide us with your personal data to confirm your identity and the option of return contact. This applies to the same personal data that you

provided to us previously. Again, providing this data is not mandatory but it is necessary to perform certain activities or to obtain the information that you require.

#### Use of data

Personal data provided by you and processing of which you agreed to, is processed exclusively to the extent and for purpose allowed by a given consent or for purpose allowed by applied law.

Data collected automatically may be used for analysis of a users' behavior on the website and also for collecting demographic data related to our users.

Data collected during correspondence between you and the Website Owner is used exclusively for enabling a correct, full and effective answer to your question.

In case of a breach of the Terms of Service constituting a violation of law, as well as in case of lack of such a breach but on the basis of other provisions of law, the Website Owner may disclose your data, including personal data, to judicial authorities in cases required by law.

#### Protection of your data

The Website Owner protects your personal data in accordance with applicable laws. We make efforts to ensure security, confidentiality and integrity of personal data collected through the website. In particular, we take steps aimed at limiting access to personal data collected through the website to the extent necessary to provide services via the website. In addition, we employ staff specially trained in personal data protection issues that perform periodical security tests of our data collection systems.

#### How do we contact you?

If you choose the available option 'E-mail notification' or similar when using the website you receive an e-mail from us.

If you choose the available option 'Text message notification' or similar when using the website you receive a text message from us.

If you send a message to us when filling in a form, we may contact you by telephone, e-mail or via fax in order to send replies to your questions.

#### E-mails

Some functionalities of our Website allow to send us e-mails. Information sent in this way is used exclusively in order to reply to your message. However, please note that e-mail is not always a safe way of exchanging information. Therefore we suggest to not include sensitive data in e-mail.

#### Surveys

The Website Owner may use different on-line surveys in order to collect opinions and information from random users of the Website. Completing survey is always voluntary.

Surveys are anonymous. The Website Owner collects only automatic IP data of the computer from which the survey is sent, however it does not attach the results to a given IP number.

## Special protection of children' personal data

The Website Owner's priority is the protection of personal data which belongs to children. In each case of collecting personal data of a person aged below 13 years, it is necessary to obtain consent of a parent or other legal guardian. In each case of further disclosure of personal data of a person aged below 13 years, it is necessary to obtain consent of a parent or other legal guardian of the child. The parents and legal guardians of the child have an access to data related to child below 13 years old and have the right to decide on further processing of this data in the same manner as in relation to their own personal data.

## Partners

This Privacy Policy does not apply to the websites of the entities whose contact details or links are displayed on our website. However, please note that the Website Owner allows data transfer between this website and Archiebot, the partner of HTML5 Meeting.

## Amendments to Privacy Policy

The offer of the Website Owner can be extended with time. Technologies, standards and requirements related to conducting business on the Internet also will change. This means that in the future the Website Owner may, and sometimes will have to amend the Privacy Policy. After each amendment, a new version of the Privacy Policy will appear on the website together with a full announcement and will come into force in its new form on the date of notification of its change by making it available on the website. All and any amendments will be properly highlighted during the first 30 days from the date of the amendment.

If you have further questions about privacy protection please contact us by using the contact form provided on [the website](#).