



# Privacy policy

Covenant.dev S.A.

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Below we present information on the principles and methods of processing your personal data in connection with our business. In the Policy you will find the most important information on how Covenant.dev S.A. based in Warsaw handles your personal data.

## Who is Administrator of my data?

Covenant.dev S.A. with headquarters in Warsaw, al. Jana Pawła II 80 (staircase H, 5th floor), 00-175 Warsaw, entered into the register of entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw XII Commercial Division of the National Court Register under the KRS number: 0000827764, NIP: 5252815862, REGON: 385562142, share capital: 131 868,00 zł paid up in full.

In all matters related to the processing of your personal data, you can contact the Administrator in writing with the annotation "Personal Data" to the address of the registered office or via e-mail to the following e-mail: [contact@covenant.dev](mailto:contact@covenant.dev).

## From where the Administrator obtains my personal data?

We obtain your personal data mainly from you. You provide us with your data to contact us by sending us an e-mail, filling in the application form in the recruitment process, and even by providing us with your business card. We also obtain your data in connection with our business activities and the implementation of transactions in the scope of the services we provide.

### Customers or contractors

If you are our client or contractor, you run a sole proprietorship or represent a company or organizational unit, we collect your personal data mainly from you. You provide us with your data to contact us in matters relating to the terms of cooperation, by sending us an e-mail or by contacting us by phone. We also obtain your data in connection with our business activity as part of the performance of the contract for the provision of services or taking appropriate actions before concluding the contract.

If you are an employee of a company or organizational unit, and the Administrator processes personal data, you have never provided them directly - it happens that your data may be provided to us by a third party, at your request or in a company with your official duties. Your data may be provided to us by your employer to enable us to contact you in connection with cooperation, we will undertake with the entity in which you are employed.

This collection also includes customers purchasing the Administrator's products offered via online platforms such as [www.store.steampowered.com](http://www.store.steampowered.com). Therefore, if you are a user of the platforms on which our products

are offered, it may happen that your personal data will be provided to us by the administrator of a given platform. As a rule, this will be information provided by the user or other information taken automatically and used to operate, maintain, improve, share, create and develop all functions and services of a given product or platform.

## Users of online platforms

If we receive your personal data from the Administrator of online platforms dealing with digital distribution, such as [www.store.steampowered.com](http://www.store.steampowered.com), your personal data will be used to implement the contract concluded with you. This includes, in particular, providing your contact details that allow us to establish and maintain contact with you in the course of cooperation.

In this case, your personal data will be processed taking into account all technical and organizational measures used by the administrator of online platforms to ensure the protection of personal data, taking full account of their privacy policies. In order to obtain additional information on the rules of processing your personal data by the administrator of a given internet platform, you should read the privacy policy adopted by him, including the cookie policy.

## Employees and job applicant

If you are our employee or co-worker, we obtain your personal data mainly from you. You provide us with your personal data for the purposes necessary from the employment perspective - when concluding an employment contract, civil law contract, or by filling in a personal questionnaire. As your employer or principal, we must process your personal data to be able to contact you and properly settle all issues related to your employment, including for tax or social security purposes. It happens that some of your personal data will be provided to us by third parties, e.g. state authorities that will contact us as your employer or cooperating entity.

In some cases, we also process your personal data shared on social media (on the LinkedIn or Facebook). Then we act to verify the information provided in the course of recruitment or employment and to secure the legitimate economic interest of the Administrator, depending on the nature of the position held.

If you are just taking steps to establish cooperation with us and want to send us your CV or cover letter, we obtain your personal data from you in order to be able to contact you and include you in the recruitment process. It happens that we use the help of external entities - dedicated portals dealing with recruitment (e.g. [www.pracuj.pl](http://www.pracuj.pl) or the SmartRecruiters), or with the help of entities dealing with employee recruitment.

In this case, your personal data is provided to us by these entities, upon your consent and request.

## Shareholders and investors

If you are an Investor, we obtain your personal data mainly from you. You provide us with your personal data for the purposes necessary for the proper implementation of the process of issuing shares as well as subscribing and increasing the share capital of Covenant.dev S.A. Your personal data is processed primarily in order to carry out the issue of shares in a given series, conclude and perform the share subscription agreement and to take steps to conclude a subscription agreement with you, as well as fulfill the legal obligations imposed on the Administrator in connection with the publication of the offer document for the issue of shares in a given series.

If you obtain the shareholder's statute, we obtain your personal data mainly from you and the National Depository for Securities S.A. (Krajowy Depozyt Papierów Wartościowych S.A.) in order to demonstrate the status of a shareholder, holding an appropriate number of shares, voting rights or the right to represent a shareholder, in connection with your intention to participate in the General Meeting of Shareholders and exercise your voting rights.

Your personal data will be processed for purposes related to the proper implementation of tasks resulting from your corporate rights in commercial companies, including to conduct the General Meeting of Shareholders and enable participation in it, prepare and make available on request a list of shareholders and possible exercise of the right to profit participation, as well as the fulfillment of legal requirements incumbent on Covenant.dev SA as a commercial company.

Your personal data will be processed for purposes related to the proper implementation of tasks resulting from your corporate rights in commercial companies. First of all, in order to conduct the General Meeting of Shareholders and enable participation in it, prepare and make available on request a list of shareholders and possible exercise of the right to participate in profit, as well as fulfill the legal requirements incumbent on Covenant.dev S.A. as a commercial company.

## Representatives of state authorities

The application of applicable legal provisions may sometimes require correspondence with representatives of public administration bodies and public institutions. The data of persons whose data is included in the letters provided to us on behalf of the body or institution are provided to us by the persons who wrote the letter or who signed it. Then we can process your data based on the contact you have made with us

## Data on file

As part of legal services, personal data of natural persons are processed in connection with inspections or court proceedings carried out by employees. We obtain data from the case files, among others by providing us with pleadings and out-of-trial pleadings and reviewing case files kept in common courts and

administrative courts as well as before public administration bodies. Data in the case file may also be obtained during control proceedings conducted by public authorities.

The application of applicable legal provisions may sometimes require correspondence with representatives of public administration bodies and public institutions. The data contained in the letters provided to us on behalf of the body or institution are provided to us by the persons who prepared the letter or who signed it. We can process such data on the basis of contact made with us.

## For what purpose the Administrator processes data?

### Running a business

If we have obtained your personal data in connection with the conducted business activity, your personal data will be used for the purposes of the performance of the contract for the provision of services or by taking appropriate steps before concluding the above-mentioned contract. This includes, in particular, receiving contact details from you, allowing us to establish and maintain contact with you in the course of cooperation.

We also use your address and registration data to deliver services to the place indicated by you, issue sales documents or settle our cooperation. We also need your personal data if you wish to exercise your rights relating to our cooperation - where applicable - protection of rights or redress.

If you are our client, contractor or supplier, you run a sole proprietorship or represent a company or organizational unit that is our client, contractor or supplier - we also process your personal data for tax, legal and accounting purposes. We need them in order to disclose the relevant data in the contract or invoice, as well as - to use them in keeping our tax records. However, the processing of your personal data will always be related to our business activities.

If you are our client, contractor or supplier, you run a sole proprietorship or represent a company or organizational unit that is our client, contractor or supplier, your personal data will be needed in particular in order to establish and maintain contact with the entity in which you work - again, only for purposes related to our business activities.

If you are a user of the platforms on which our products are offered, it may happen that your personal data will be provided to us by the administrator of a given platform. If you receive your personal data from the administrator of online platforms dealing with digital distribution, your personal data will be used for the purposes of the performance of the contract concluded with you via the platform.

Your personal data, which we use for purposes related to economic cooperation, will not be used by us for other purposes without your consent. The exception to this is the use of your data for marketing purposes, based on our legitimate interest. We want to maintain a relationship with you, so we want to be able to keep

you informed about our new offers and promotions. If it does not suit you - you can object at any time, on the terms described below in the Policy.

## Employment relationship

If you are our employee or co-worker, we use your personal data for purposes related to your employment, including recording working time or supporting employee qualifications as part of training. As your employer or cooperating entity, we must fulfill a number of obligations - both in terms of the proper arrangement of our cooperation and in HR and payroll matters. As employers, we also have certain rights - we use your personal data, for example, to be able to contact you or to control the effects of your work.

We also need your personal data to provide you with access to employee benefits and rights as well as benefits and support in the event of your illness or maternity, as well as in the event of an accident at work. Again, the purpose of processing your personal data is to properly handle the employment or cooperation relationship between us and to protect your interests.

It may happen that we will also use your personal data to provide information about you to third parties, e.g. to the bank where you are applying for a loan, to the insurer, or to a public authority that will ask us an inquiry. In these situations, your personal data will be disclosed for your benefit, at your request or in connection with our legal obligations.

Your personal data, which we use for purposes related to the employment relationship or civil law relationship, will not be used by us for other purposes without your consent. In particular, we will not process your data for marketing purposes without your express consent.

## Recruitment

If you apply for employment with us, we use your personal data only for the purpose of conducting the recruitment process. We use your data to get acquainted with your education and professional experience, assess your suitability for work with us and determine the fulfillment of the criteria we require for employment, and finally - to contact you and invite you to an interview.

If, after the recruitment, we decide to hire you, the personal data provided during the recruitment may be used for the purposes of future employment so that you do not have to provide them again. Most often, personal data provided by you in your CV and in the cover letter are stored in your employee file.

Your personal data, which we use for recruitment purposes, will not be used by us for marketing purposes without your consent.



## Investments

If you are an Investor, we process your personal data mainly for the purposes necessary for the proper implementation of the process of issuing shares as well as subscribing and increasing the share capital of Covenant.dev S.A. Then your personal data is processed primarily for the purpose of issuing shares in a given series, concluding and performing a share subscription agreement, and taking steps to conclude a subscription agreement with you, as well as fulfill the legal obligations imposed on the Administrator in connection with the publication of the share issue offer document given series.

On the other hand, we process the personal data of Shareholders mainly in order to demonstrate the status of a shareholder, holding an appropriate number of shares, voting rights or the right to represent a Shareholder, in connection with your intention to participate in the General Meeting of Shareholders and exercise voting rights.

If you are a Shareholder, your personal data will be processed for purposes related to the proper performance of tasks resulting from your corporate rights in commercial companies, including to conduct the General Meeting of Shareholders and enable participation in it, prepare and make available a list of shareholders upon request, and possible exercise of the right to participate in profit, as well as the fulfillment of legal requirements incumbent on Covenant.dev SA as a commercial company.

## Contact

If you send us an e-mail or otherwise contact us, we use your personal data to correspond with you and answer the questions you have asked, in accordance with the content of your inquiry or message.

If you contact us for commercial purposes (e.g. to use our services), your personal data may then be used to send you a commercial offer but only to the extent that you request it and in relation to your inquiry.

Even if we establish communication for commercial purposes, we will not use your personal data for marketing purposes without your consent in relation to offers other than the one you expressly requested when contacting us.

## Investigation and defense of claims

It happens that we will have to use your personal data to assert or defend our rights, including in court. We hope that this will not happen, but if any dispute arises between us we may have to process your personal data in the course of court, arbitration or mediation proceedings.

In this case, we will use your personal data only to the extent necessary and in connection with the ongoing talks or proceedings. It may happen that we will use your personal data to call you as a witness in the case, or - if you are our contractor or supplier - in connection with the fact that you will be a party to the case.

Your personal data, which we use for purposes related to the investigation or defense of claims, will not be used by us for other purposes without your consent. In particular, we will not process your data for marketing purposes without your express consent.

## Marketing purposes

We process your personal data in connection with the functioning of our marketing base for our marketing purposes, i.e. as part of promoting our product and service offer. As part of our marketing, we want to be able to present you our new range of products or services, as well as new commercial or business solutions used in our business.

For marketing purposes, we process your personal data with reference to the so-called legitimate interest of the personal data Administrator (Article 6 (1) (f) of the GDPR). Permanent information about our activities is necessary for us and desirable to maintain the network of customers. Consequently, we have a legitimate interest in maintaining our marketing base and sending information to customers. Providing and processing your personal data in this regard is completely voluntary and does not result from a legal obligation. You have the right to object to the processing of your data in this regard at any time.

## On what basis the administrator processes my personal data?

The Administrator ensures that your personal data will be processed only in accordance with the law. This means that we will always process your personal data on a specific basis that we will be able to demonstrate. The basis for the processing of personal data may differ depending on the purpose for which we process personal data.

### Running a business

If we have obtained your personal data in connection with your business activity, we process your data first in order to fulfill the cooperation agreement that binds us, and secondly also in order to enable you to exercise your rights related to our cooperation - there, where applicable, protection of rights or redress.

The basis for processing here will therefore be the necessity to use your personal data in order to carry out the transaction of delivering goods or providing services. If a party to the Agreement is an entity other than you (e.g. we have obtained your data from your employer, or you act as a representative of a company or organizational unit in communication), the basis for the processing of your personal data will be the use of

your data for the purposes of legitimate interests pursued by us this entity (third party), e.g. to ensure the correct delivery or service.

If we have received your personal data from the administrator of online platforms dealing with digital distribution, your data will be processed taking into account all technical and organizational measures used by the administrator of online platforms to ensure the protection of personal data, taking full account of their privacy policies.

In this case, the basis for processing will be the necessity to use your personal data to carry out the transaction of delivery of goods or provision of services offered through digital distribution platforms.

## Internet service (cookies)

Data on your use of the website, which we obtain via the so-called We process cookies on the basis of your consent, expressed in accordance with Article 173 of the Telecommunications Law.

Cookie files (so-called "cookies") are IT data, in particular text files, which are stored on the Website User's end device (computers or mobile devices connected to the Internet) and are intended for using the Website's pages. Cookies usually contain the name of the website they come from, the storage time on the end device and a unique number.

A banner is displayed on our website asking for permission to place cookies on the user's device. If the user does not consent to this, activities carried out via the user's computer or connected device will not be monitored for marketing purposes.

We use two basic types of cookies - session and permanent. Session files are temporary, they are stored until you leave the website (by entering another page, logging out or turning off the browser). Permanent files are stored on the user's end device until they are deleted by the user or for the time specified in the cookie file parameters and resulting from their settings.

Despite the fact that most web browsers automatically allow cookies to be placed on the computer, the user may refuse to do so by making changes to the browser settings (in most cases, this option can be found in the Tools or the Browser Preferences menu). The user can also delete cookies from his device at any time. In this case, please note that by not agreeing to the placement of cookies, the user will not be able to fully use all the functions of our website.

The cookies we use are primarily used to optimize the use of our website, create statistics of their visits and to maintain the user's session.

The processing of your personal data in this regard is based on our legitimate interest, i.e. on the basis referred to in Article 6 (1) (f) GDPR and on the basis of your consent, expressed by you by accepting the collection and use of cookies in the online form.

## Employment relationship

All personal data processed by the Administrator in connection with the already established cooperation on the basis of an employment contract or a mandate contract are used in order to properly fulfill the role of the employer. The use of this data is necessary for us to fulfill the obligations imposed on us under the provisions of Polish law governing a given form of employment or cooperation, as well as - to enable us to exercise our rights as an employer.

Sometimes, your health data will also be used as necessary to fulfill obligations imposed on the basis of social security regulations or provisions on preventive healthcare or occupational medicine.

The basis for the processing of your personal data is the necessity of their use for the proper performance of the employment contract that connects you with us, as well as the fulfillment of the legal obligation incumbent on us under the provisions of labor law or civil law. In terms of your health data, the basis for processing is the necessity to use them to fulfill the obligations and exercise specific rights by the controller or the data subject in the field of labor law, social security and social protection, as well as for the purposes of preventive healthcare or occupational medicine, assessment of the employee's ability to work, medical diagnosis, healthcare or social security.

## Recruitment

In the recruitment processes, we try to obtain your consent to the processing of personal data for the purpose of recruitment whenever possible, asking you to include the relevant consent in your CV or cover letter provided to us. This allows you to avoid doubts as to whether we have the right to use all personal data disclosed by you in the documents sent or during the recruitment process.

Even if you do not consent to the processing of your personal data for recruitment purposes (e.g. you send us your CV without the necessary consent), we will still be able to process your personal data to the extent necessary for the recruitment process.

The basis for the processing of your personal data will therefore be your consent, and in the event of its absence - the necessity to use your data to undertake recruitment activities aimed at concluding an employment contract or a mandate contract (i.e. to take action in accordance with your request, before concluding the Agreement).

If we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time, which, however, will not deprive the processing of personal data in accordance with the law during the period in which your consent was valid.

Your consent is voluntary, but necessary for the recruitment process. Without consent to the processing of your data in this regard, we will not be able to contact you and carry out the recruitment process.

## Investments

We process Investors' personal data primarily for the purpose of issuing shares of a given series, concluding and performing a share subscription agreement, and taking steps to conclude a subscription agreement with the Investor. The basis for the processing of your personal data is the necessity of their use for the proper performance of the share subscription agreement, as well as the fulfillment of the legal obligation incumbent on us under the provisions of commercial law or the Act on public offering and conditions for introducing financial instruments to an organized trading system and on public companies.

After the subscription is closed, your personal data as a shareholder is processed by us in order to support your corporate rights and obligations, including in order to enable you to participate and conduct the General Meeting, fulfill the obligation to provide the list of shareholders at your or other shareholders' request, perform tasks related to servicing entities holding shares in Covenant.dev SA, as well as the information obligation, as well as fulfill legal obligations incumbent on Covenant.dev ARE as a joint stock company.

## Contact

If you contact us, for example via e-mail, the processing of your personal data is necessary for us to take action at your request, in accordance with the content of your inquiry or message.

In this case, the basis for the processing of your personal data will be your consent or the necessity to use your personal data to take action in accordance with your request, before concluding the Agreement. If we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time, which, however, will not deprive the processing of personal data in accordance with the law during the period in which your consent was valid.

Your consent in this regard is voluntary, but necessary to make contact. Without consent to the processing of your data in this regard, we will not be able to contact you.

## Investigation and defense of claims

If we use your data in connection with the investigation or defense of claims, the basis for the processing of your personal data will be the legitimate legal interest of the Administrator as the personal data administrator. The use of your data will be necessary to protect our interests, e.g. in the field of debt collection, defense against unjustified allegations, etc.

## Marketing purposes

We will process your personal data for marketing purposes with reference to the so-called legitimate interest of the personal data administrator (Article 6 (1) (f) of the GDPR), authorizing us to send you commercial and marketing messages. As part of our marketing, we take care to present you with up-to-date information about

our new range of products or services, as well as new commercial or business solutions used in our business.

Providing and processing your personal data in this regard is completely voluntary and does not result from a legal obligation. You have the right to object to the processing of your data in this regard at any time.

## How long the administrator keeps my data?

The period for which we process your personal data depends on the purpose of processing accordingly:

- (i) **if you are our client, contractor or supplier, or if you act on their behalf** - we process your personal data for the duration of the contract or the period of cooperation. After this period, we will process your data for purposes related to the accountability of our activities within the scope of personal data protection, as well as for the period of limitation of claims related to cooperation under applicable law, but not longer than for a period of five (5) years from the date of issuance of the final decisions to discontinue the proceedings due to the recovery of the entire amount due;
- (ii) **if you are our employee or contractor** - we process your personal data for the entire period of cooperation or employment, as well as for the period required by law in the field of storage or archiving of documents and information regarding employment, but no longer than for a period of ten (10) years from the termination of employment relationship - Article 125a (4) (a) of the Act of 17 December 1998 on pensions from the Social Insurance Fund (unifroma text Journal of Laws of 2020 No. 53). If proceedings are brought before a court or public authority, the documents may be stored throughout the proceedings until the final conclusion of the proceedings, but no longer than for a period of five (5) years from the date of the final completion of the enforcement proceedings in the event of recovery of the entire amount due. We process data related to the performance of OHS activities and training courses organized for employees for the duration of the contract;
- (iii) **if you disclose your personal data to us in connection with recruitment** - we will store your personal data for the duration of the recruitment process, and if we are not recruiting - for a period of three (3) months from the date of receipt of your CV or cover letter. Storing your personal data for this period will allow us to contact you if we start employment activities at a later date;
- (iv) **if you are an investor or shareholder** - we process your personal data until the process of subscribing to shares and increasing the share capital is completed or the subscription is legally unsuccessful, extended by a period of five (5) years related to the need to store data regarding the share issue. In addition, we process your personal data as a Shareholder for a period of five (5) years from the date of the General Meeting of Covenant.dev S.A. for which they have been

prepared, and in the event of appealing against the resolutions of the General Meeting, until the final conclusion of court proceedings in this regard;

- (v) **if you establish communication with us** - we keep your personal data for the entire period of communication and correspondence, and in settling the case or providing you with a complete answer - we store this data for a period not longer than five (5) years from the end of communication, to enable you to return to previous discussions and issues, and to account for our activities in the field of personal data protection;
- (vi) **the data obtained about the way you use our website** - will be used by us for the entire period of cooperation, and for a period of five (5) years from the last time you visited our website;
- (vii) **personal data used by us for marketing purposes** - will be processed by us for the entire period when you are our client and then for a period of five (5) years from the time you stopped using our offer and did not purchase our products.

The Administrator deletes personal data no later than one year (1) from the end of the data processing period.

## Who is the recipient of my personal data processed by the Administrator?

We make sure that your personal data is transferred only to those persons who must have access to it for the proper fulfillment of our cooperation, or in connection with our legal obligations. Your personal data will be shared:

- (i) **employees and co-workers of the Administrator involved in handling cooperation or issues** - in each case, however, we will make sure that these persons are authorized to process your personal data and undertake to maintain confidentiality in this regard;
- (ii) **entities related to the Administrator** - only to the extent necessary resulting from the need for proper communication of the organization (if you are our employee or co-worker) or it is necessary to ensure the correct implementation of mutual obligations (regarding customers, contractors or suppliers);
- (iii) **entities providing IT and hosting services to the Administrator** - we also process your personal data in electronic form, which means that entities that support us from the IT side, as well as hosting service providers on which we store our data, including in the field of e-mail;
- (iv) **transport or transport companies** - for the delivery of goods or other things (e.g. documents) to the address you provided when purchasing or in the course of cooperation;

- (v) **entities providing legal, tax, accounting and HR and payroll services to the Administrator** - to the extent that disclosure of your data is necessary to ensure the correctness of tax settlements, in terms of human resources and payroll, or in connection with ongoing proceedings. In the same scope, access to your personal data will be granted to entities providing legal services to us, involved e.g. when giving opinions on documents on which your personal data is contained;
- (vi) **public authorities, courts and tribunals** - to the extent that the transfer of your personal data will be necessary or required due to pending proceedings or in connection with the obligation to transfer data to specific authorities on the basis of legal provisions (settlements with the Tax Office and the Social Insurance Institution, etc.).

In the case of using services, the Administrator does not provide data to service entities for the purpose of providing. We do not sell your data, so you do not have to worry that it will reach anyone with whom you did not want to share the data.

## How my personal data is processed and protected?

### Rules for the processing of personal data

We make every effort to ensure that your personal data is processed in accordance with applicable law and with respect to the principles of their processing indicated in the GDPR. The basic principles and standards for the processing of personal data in our company are set out in the detailed Personal Data Protection Policy, which is obligatory for every employee and co-worker of ours. We make sure that all persons involved in our business are aware of the importance of ensuring the proper processing of your personal data.

The basic principles that guide us in the processing of your personal data are:

- (i) **the principle of compliance of the processing of personal data with the law, reliably and transparently** - we strive to ensure that the processing of your personal data by us always takes place on a legally permissible basis, and that the processing of your personal data and the purposes of processing are clear and understandable to you;
- (ii) **the principle of data minimization** - we make every effort to ensure that only those personal data that are adequate, relevant and limited to what is necessary for the purposes for which they are processed are processed. We provide your personal data only to recipients for whom it is necessary to achieve the purpose for which we process your data. We provide these recipients only with the scope of your data that is necessary for this purpose;
- (iii) **the principle of limitation of the purpose of processing** - we collect your data only for specific, explicit and legally justified purposes and we do not process them further in a manner



inconsistent with these purposes. We strive to provide you with adequate and precise information as to why and for what purposes we will process your data;

- (iv) the principle of correctness - we make sure that the data processed by us is always truthful, correct and, if necessary, updated, so that there are no mistakes, distortions or other irregularities. If you find that in some area your personal data has not been updated by us or is incorrect, please contact us at: [E-mail address];
- (v) **the principle of limiting the storage time** - we will process and store your personal data only for the period necessary to achieve the purpose for which we process your data. When we no longer need your data in any way - we will delete all your data from our databases and systems;
- (vi) **the principle of integrity and confidentiality** - we apply the necessary measures to protect the confidentiality and integrity of your personal data. Our priority is to ensure full security and protection of your personal data by using up-to-date and appropriate security measures;
- (vii) **the principle of accountability** - in the field of personal data protection, we not only comply with the rules and conditions for their processing, but also make every effort to be able to demonstrate compliance with these standards and compliance with the provisions at all times. The rules for the processing of your personal data are written down as part of the procedures, so that in the event of your inquiry, we can provide you with full and reliable information about what activities we have performed on your data.

## Security of personal data

As mentioned above, we use appropriate technical and organizational measures to ensure the full security of your personal data against their (culpable or accidental) destruction, loss, modification, unauthorized disclosure or unauthorized access.

These measures include technical safeguards (proper protection of the premises and systems in which we process your personal data; safeguards that prevent unauthorized persons from reading the content of documents containing personal data, creating backups, etc.) and the rules and procedures that we require from all our employees and co-workers.

The measures used allow us to properly protect your personal data against loss or disclosure. In addition, we are constantly improving them along with the changing environment and technological progress.

# What rights do I have in relation to the processing of my personal data?

In connection with the processing of your personal data by us, you have a number of rights that you can exercise at any time. The use of these rights is free of charge, and the Administrator makes every effort to ensure that it is also easy to implement.

## Rights related to the processing of personal data

- (i) **the right to access personal data** - you have the right to ask us at any time to ask for information whether and to what extent we process your personal data and to obtain information about the rules for processing your personal data;
- (ii) **the right to correct data** - you have the right to ask us at any time to correct or update your data, if it turns out that your data is incorrect or out of date. For the avoidance of doubt, Covenant.devS.A. may ask you to provide information allowing to identify you and confirm the change or update of the data;
- (iii) **the right to limit processing** - if it turns out that we process too wide a catalog of your personal data for a specific process, you have the right to request that we limit this scope of processing. Unless your request is contrary to the requirements imposed on us by applicable law, or it is not necessary for the performance of the contract, we will limit the processing of your personal data to the minimum necessary or stop further processing;
- (iv) **the right to delete data (the right to be forgotten)** - if it turns out that we process your personal data without a legal basis, or we process it, although we no longer need it for the purposes for which we collected it - you have the right to request that we delete it Your personal data of our databases and systems. We will comply with your request, unless there is another legitimate interest in the processing of your personal data or an obligation to further process your personal data. In each case, we will try to fulfill your request to the fullest extent possible, and if this is not possible - we will try to modify it in such a way that it can no longer be assigned to you (under the so-called pseudonymisation);
- (v) **the right to transfer data** - in those cases where your personal data is processed on the basis of consent or in connection with the performance of the Agreement, and the data processing is carried out in an automated manner (e.g. in an IT system), at your request, we will export the data that we process to a separate file in a popular format to enable their transfer to another data controller.

The rights referred to above may be exercised by reporting them to our e-mail address [contact@covenant.dev](mailto:contact@covenant.dev) and by letter to the address Covenant.dev S.A. with headquarters in Warsaw, al. Jana Pawła II 30 (staircase H, 5th floor), 00-175 Warsaw, with the annotation "Personal data". We also invite you to contact us at this address in all situations in which you have concerns, questions or doubts as to how we process your personal data.

## Right to opposition

We would like to inform you separately that you have the right to object to the processing of your data. If you find that in a situation of processing your personal data based on the public interest or the legal interest of the Administrator or any third party - we process your data too broadly (in an inadequate manner) - you may request that the processing of your data be restricted. You have the same right if at any time you decide that you do not want us to process your data directly for marketing purposes. After the objection is raised - we will no longer process your data in this regard and for this purpose, unless it is necessary due to the existence of some valid legally justified grounds for processing your data, overriding your interests, rights and freedoms; or to establish, exercise or defend our claims.

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## Right to lodge a complaint

If you recognize that we have violated the rules of processing your personal data in any way, you have the right to lodge a complaint directly with the supervisory authority, i.e. the President of the Personal Data Protection Office.

As part of exercising this right, you should provide a full description of the situation and indicate what action you consider to be violating your rights or freedoms. The complaint should be submitted directly to the supervisory authority.