PRIVACY POLICY

(hereinafter: **“Policy”**)

version 1.0.0 as of January 13, 2024

Policy objective

The use of the Inlockly™ password manager services, available in the web application via the website at www.inlockly.com (hereinafter: "**Website**"), as well as the mobile application installed on the selected mobile device (hereinafter: "**Application**"), involves the processing of personal data of the Application users, i.e. primarily employees of companies, members of business groups, enterprises, family members and individuals. The protection of personal data is of great importance to us, and we are therefore committed to ensuring safe and transparent processing of personal data and compliance with data protection laws, in particular the provisions of the General Data Protection Regulation (hereinafter: "**GDPR**").

This Policy informs you of the details of our processing of personal data, in particular what personal data we collect, for what purpose and how we use it, and to whom we may transfer data. In the Policy you will also find information about your rights in connection with the processing of personal data.

This privacy policy has been structured in the form of questions and answers. The choice of this form was dictated by the concern for clarity and legibility of the information presented to you.

Who is the controller of your personal data?

Information about the data controller

The administrator of the personal data is IMPERIT Dawid Łukaszek company. with its registered seat in Cisie, Cisiańska 108A, 42-290 Cisie, Poland; with numbers TAX ID: 9492259428, REGON: 524405263, hereinafter referred to as "**IMPERIT**" or "**we/us/our**".

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What is the scope of the processed data?

- The Application processes personal data of the Application's users, who may be employees of companies, members of business groups, enterprises, family members and individuals, as well as other individuals using the Application (hereinafter: "**Users**"). Users personal data is processed in the Application by IMPERIT on the basis of entrustment of their personal data, to the following extent:

a) identification data (such as name and surname);
b) image (photo of the User) - optional;
c) contact information (e-mail address);
d) preference data (such as region and language);
e) service data, e.g. IP address, browser information, operating system, etc.;
f) secure data - entrusted by the user in encrypted form;

- Personal data on Payments and processed on the Website are processed by IMPERIT to the following extent:

a) financial data related to payments (such as: bank account number, payment status);
b) data collected automatically during the use of the Application and Website, i.e. data automatically recorded in server logs and the Application or Website, e.g. IP address, browser information, browser language, device information, operating system, etc.;
c) data collected in cookies and similar technologies - see Cookie Policy for more information.

- Correspondence handling

a) With regard to personal data provided to us in the content of correspondence, in particular e-mail address and name, the administrator of personal data is IMPERIT. Provision of data is voluntary, but necessary to establish contact. In this case, the data are processed for the purpose of contacting you, and the basis for processing is Article 6(1)(GDPR) (legitimate interest). The legal basis for post-contact processing is also our legitimate purpose of archiving correspondence for the purpose of ensuring that we can prove certain facts in the future (Article 6(1)(f)GDPR).

What is the data we call secure data?

Secure data is data that is transmitted and saved by the user in an encrypted form. They include all data stored in safes in Inlockly™ accounts. This data is encrypted using secure cryptographic keys that are held only by our customers on their devices. The cryptographic keys are never transmitted anywhere. We have no way to decrypt this data in order to access it. Secure data is never transmitted in decrypted form.

Secure data is your property. We do not claim any rights to them except as necessary to provide services to you. You may add, modify and delete secure data at your discretion. If you do not have a Inlockly™ account, you cannot provide us with secure data.

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What is service data?

We acquire data regarding your use of Inlockly™. We only store data necessary to operate and maintain our services. This data is never used for any other purpose.

Service data are treated as confidential. They are visible to our staff and include, but are not limited to, server logs, billing information, IP addresses, number of vaults, number of items in a vault, company name or name and email addresses, and profile picture.

As long as you use our services, we retain the right to store and use this data to provide services, troubleshoot problems, analyze performance and requirements for our services, and provide our processors with information needed to process payments.

Service data never includes decrypted secure data.

We will never ask for your account password or cryptographic key.

Access to a mobile device

The application, installed on the mobile device, can access the following permissions or information of the User's device:

a) device memory (access is necessary to use the Application in its basic version);
b) technical data of the device (access is necessary to use the Application in its basic version);
c) internet or Wi-Fi access (access is necessary to use the Application in its basic version);
d) push notifications (optional access);
e) biometric data to enhance account security (optional access);
f) photo, media or file galleries (optional access);
g) the device's camera (optional access);

Access to certain permissions or information is optional and may depend on the particular Services available on the Application. The User is informed prior to activation of a particular Service what accesses are required to activate the particular Service. The User may check or adjust or revoke access permissions accordingly at any time in the settings of the mobile device.

For what purposes and on what basis do we process data?

IMPERIT may process Users personal data in the Application regarding Payments for the purpose of:

a) performance of services offered through the Application with regard to Payments - processing of the data is necessary for the performance of the contract to which the data subject is a party - based on Article 6(1)(b) of the GDPR;
b) to ensure compliance with legal obligations incumbent on us, e.g. tax settlements for services rendered for a fee - data is processed in order to fulfill a legal obligation incumbent on IMPERIT on the basis of Article 6(1)(c) GDPR;
c) improve the quality of services provided in the Application - data is processed based on the legitimate interest of IMPERIT on the basis of Article 6(1)(f) GDPR;
d) asserting or defending against claims - data is processed based on the legitimate interest of IMPERIT on the basis of Article 6(1)(f) of the GDPR.

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IMPERIT may process Users personal data on the Website for the following purposes:

a) provision of electronic services available through the Website - data is processed for the purpose of performing the contract on the basis of Article 6(1)(b) of the GDPR;
b) improve the quality of services provided through the Website - data is processed based on the legitimate interest of IMPERIT on the basis of Article 6(1)(f) GDPR;
c) asserting or defending against claims - data is processed based on the legitimate interest of IMPERIT on the basis of Article 6(1)(f) of the GDPR;

Where did we get Users' personal information from?

Personal data has been entrusted to IMPERIT for processing by the User to whom the data pertains, during activities such as:

- User account registration through the registration form;
- Contact IMPERIT via contact form or chat;
- Signing up for the Newsletter by entering your email address in the appropriate form;

Provision of data is voluntary, but necessary for the correct provision of services.

Location and data transfer.

Inlockly™ data is stored on servers located in the European Union. Data originating in the European Union remains in the European Union.

On what basis do we process User's image?

The User's image will be processed on the basis of voluntary consent for the use of the image under PL Article 81(1) of the Law of February 4, 1994 on Copyright and Related Rights, expressed by uploading photos in the Application.

The withdrawal of this consent is done by deleting the photo, whereby the withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.

The User shall be responsible for fulfilling the conditions of lawful dissemination of the image of other persons in the Application if the User posts photos in the Application that feature persons other than the User.

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Is it possible to withdraw consent? What are the consequences of uninstalling the Application?

The User may stop using the Application at any time, but personal data may continue to be processed by the Administrator to the extent justified by the processing on other legal grounds.

If the processing of personal data is based on your consent, you have the right to withdraw your consent at any time by uninstalling the Application in the mobile version and deleting your account in the settings of the Application in the browser version. Withdrawal of consent does not affect the lawfulness of processing that was performed on the basis of consent before its withdrawal.

The owner of a group of users, e.g., a company, a team or a family, can detach a User (e.g., an employee account) himself. In this case, the owner unhooks the user in question from the shared safes, but the user still has his account and access to his private data.

Is it necessary to provide data?

Provision of data is voluntary, but necessary to create an account in the Application and use it.

Accounts created in the Application and personal data provided are not verified.

To whom may we share data?

User Data that IMPERIT processes on the Website or regarding Payments may be transferred to entities that we work with and that support us in developing and operating the Website and Payments. Third-party service providers that may process your personal data include: hosting service provider, IT service providers, payment providers, accounting office (which processes the data you see on invoices), analytics and social media providers, invoicing system provider, courier companies, and consulting or legal service providers.

We will comply with applicable laws and agreements with our customers regarding the sharing of data with law enforcement agencies. If permitted, we will notify you of such a request and whether we have complied with it.

Confidential user data remains encrypted with keys we do not have, so we can only transmit data in encrypted form.

Some data is shared with owners of user groups such as family, company or team accounts. Under certain limited circumstances, we may provide certain information to non-owners of these accounts. Account owners will be informed.

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How do we ensure the security and confidentiality of information?

We are fully aware of our responsibility to protect data and keep it secure. We employ strict access controls, network isolation and encryption to ensure that data is fully secure and is only accessible to authorized users and teams.

In addition, we ensure that confidential data cannot be decrypted even by those who have access to it.

How long do we keep the data?

Users' data will be retained for as long as necessary to fulfill the purposes of processing, which, in terms of Users of the Application, are decided by the person setting up the account. IMPERIT will process the data for the period of providing services to the person setting up the account, related to the use of the Application.

What are the conditions for the use of the app by minors?

Persons under the age of 16 are not allowed to use the services without the consent or authorization of a parent or legal guardian. Owners of user groups such as family accounts, teams or companies are responsible for this authorization when they add a person under 16 to the group.

What rights do you have in relation to data processing?

Users have the following rights in connection with the processing of personal data and within the scope of applicable law:

a) the right to access personal data,
b) the right to request rectification of data,
c) the right to delete data,
d) the right to restrict processing,
e) the right to object to processing based on legitimate interests,
f) the right to data portability.

The rules related to the exercise of the rights indicated above are described in detail in Articles 16 - 21 of the GDPR. In case of doubt, it is advisable to familiarize yourself with these provisions. Please be advised that the rights indicated above are not absolute and you will not be entitled to all processing activities of your personal data.

We emphasize that one of the rights indicated above is always available to you - if you consider that we have violated data protection regulations in the processing of your personal data, you have the opportunity to file a complaint with the supervisory authority (President of the Office for Personal Data Protection).

You can also always request that we provide you with information about what data we have about you and for what purposes we process it. All you need to do is send an email to: gdpr@imperit.com

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What social media are we using?

IMPERIT places social media plug-ins on the Website and also uses selected analytical tools, listed below.

The Website uses plug-ins, buttons and other tools of social media providers. Through the use of the aforementioned plug-ins (e.g., by sharing the Website on social media or clicking the "like" button), these entities obtain data collected through the Website about users. This data (e.g., pages visited, user IDs, social media profile information), including personal data, may be transferred outside the European Economic Area and used by the social media providers for their own purposes, for example, user profiling, analytical and marketing purposes, ad targeting. Each social media provider functions as a separate data controller or co-controllers. For details of the social media provider's data, its contact information, the scope of the data used and a description of the purposes for which these entities use the data, please refer to, among others, privacy policies or other similar pages.

We use the following social media on the Website:

- *Facebook*
  - https://www.facebook.com/inlockly
  - Privacy policy: https://www.facebook.com/policy.php
- *Twitter*
  - https://twitter.com/inlockly
  - Privacy policy: https://twitter.com/en/privacy
- *LinkedIn*
  - https://www.linkedin.com/showcase/inlockly
  - Privacy policy: https://pl.linkedin.com/legal/privacy-policy
- *Instagram*
  - https://www.instagram.com/inlockly/
  - Privacy policy: https://help.instagram.com/519522125107875/?maybe_redirect_pol=0

Policy Changes

We reserve the right to change the provisions of the Policy at any time, in particular if the functionality, services or processes within the Application change in a way that affects the processing of personal data. The current Policy with changes will be published on the Website and will be made available on the Application.

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