

## PRIVACY POLICY

Universality is an innovative platform connecting students, lecturers and HR specialists in the IT industry. Thanks to the system, employers can publish tasks that will be used by teachers at universities. Students get access to practical programming tasks, and most importantly, they acquire practical knowledge in a quick and effective way.

### I. Processing of personal data

1. Due to the fact that as part of the Application, Universality processes Users' personal data, respecting the Users' right to privacy, in order to ensure the protection of personal data and provide appropriate information in this regard to Users, this Security Policy is made available, constituting an Annex and an integral part of the Regulations (hereinafter referred Politics).
2. Terms used in the Policy and written with a capital letter have the meaning given in the Regulations, unless explicitly stated otherwise.
3. The processing of personal data in the Application is carried out in accordance with the Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46 / EC (General Data Protection Regulation) (hereinafter GDPR).
4. The Application collects Users' personal data provided by Users during Registration, i.e. name and surname, e-mail address, avatar; additionally in the case of Resolving Persons: field of study, year of study, name of the university, telephone number (in order to contact the student by our employee); in the case of Lecturers: the name of the university and the name of the main university; in the case of customers - natural persons running a business: telephone number, company name and logo; as well as personal data resulting from the User's use of the Application, i.e. :
  - a. for Solvers: content of responses to Tasks, level, skills, career paths that they have signed up for, career paths they have joined, technologies they know - through tags, ranking;
  - b. in the case of the Lecturers: the content of the written Tasks, subjects taught, lessons, signature under the task, technologies that he knows - through tags;
  - c. for Clients: Task content, career paths and skills, technologies they need - through tags.
5. The data collected during Registration is necessary to set up a User Account in the Application and enable him to use the services provided under the Application. The User has access to data through the Account and can manage it.
6. The data collected when the User uses the Application is stored on the User Profile and is used to ensure the proper operation of the services within the Application, as well as to create Statistics within which data on the tasks being solved and Users' activity are generated.
7. Personal data protection is carried out through physical security, organizational procedures and system software.
8. The applied security guarantees:

- a. lawfulness, honesty and transparency - which is understood as processing lawfully, fairly and transparently for the User,
- b. purpose limitation - which is understood as collecting personal data for specific, explicit and legally justified purposes and not further processing in a manner inconsistent with these purposes,
- c. data minimization - which is understood as the processing of personal data that is adequate, relevant and limited to what is necessary for the purposes for which they are processed,
- d. correctness - which is understood as processing personal data that is correct and, if necessary, updated,
- e. storage limitation - which is understood to mean the storage of personal data in a form that permits the identification of the data subject for a period not longer than it is necessary for the purposes for which the data are processed,
- f. integrity and confidentiality - processing in a manner ensuring adequate security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, by appropriate technical or organizational measures.

## II. The basis for the processing of personal data and the purposes of data processing

1. The User's personal data are processed on the Account and User Profile pursuant to art. 6 sec. 1 lit. b GDPR, i.e. to provide services to the User as part of the Application, in particular:
  - a. to provide access to the Application tools and databases as part of the Application;
  - b. to authenticate the User when logging in to the Application.
2. The User's personal data are processed on the Account and User Profile pursuant to art. 6 sec. 1 lit. a GDPR, i.e. for marketing purposes, provided that the relevant consent is expressed by the given User and in the scope of these consents.

## III. Categories of recipients of Users' personal data

1. The User's personal data may be transferred to the following entities:
  - a. Lecturers who have an active Account and Profile as part of the Application;
  - b. Clients who have an active Account and Profile as part of the Application, provided that the User - the Solver has started solving the Task entered by the Client or that the User agrees to observe the Profile of a given Solver;
  - c. entities providing legal, accounting and tax services to the Application and Universality.

Universality does not intend to transfer the User's personal data to a third country or an international organization.

## IV. Users' rights

1. The User has the right to obtain confirmation of the processing of personal data, as well as to obtain a copy of the personal data subject to processing.
2. If the data is incorrect or incomplete, the User has the right to request the correction of personal data.
3. The User has the right to request the deletion of data concerning the User, ie the User is entitled to the so-called the right to be forgotten, unless the processing of personal data is necessary for the establishment, exercise or defense of legal claims.
4. In the cases specified in Art. 18 GDPR, the User has the right to request that the processing of your personal data be restricted.
5. Due to the fact that the basis for the processing of personal data is not Art. 6 sec. 1 lit. e or f of GDPR, the User is not entitled to object to the processing of your data.
6. The User has the right to receive from Universality the data concerning the User in a structured, commonly used and machine-readable format, and to send this data to another administrator or request that Universality directly send this data to the indicated administrator.
7. The user has the right to lodge a complaint with the supervisory authority for compliance with the provisions on the protection of personal data when you feel that the processing of personal data by Universality violates the GDPR.
8. The User has the right to withdraw the consent granted for the processing of personal data at any time, without affecting the lawfulness of the processing which was carried out on the basis of consent before its withdrawal.
9. The implementation of the indicated rights takes place by sending an application to the e-mail address: [support@universality.io](mailto:support@universality.io).

In order to summarize the presented information, they are presented collectively in the table below:

1.	The administrator of your personal data	The administrator, i.e. the entity deciding how your personal data will be used, is Universality limited liability company based in Krakow (address: Przemiarcka 23a / 63, 30-384 Krakow), registered in the Register of Entrepreneurs of the National Court Register kept by the District Court for Kraków, XII Commercial Division of the National Court Register under number 0000769121, share capital PLN 400,000, NIP: 6762560918, REGON: 382424103 (hereinafter the Company or the Administrator).
2.	Contact in matters related to the processing of your personal data	In the case of obtaining detailed information on the processing of personal data, as well as in all matters related to the processing of personal data, please contact the Administrator in writing at the following address: ul. Przemiarcka 23a / 63, 30-384 Kraków, e - mail: <a href="mailto:support@universality.io">support@universality.io</a> , or by phone: +48696048558.

3.	Personal data protection officer	The personal data protection officer in accordance with art. 158 sec. 1 of the Act on the Protection of Personal Data, you are _____, e-mail: _____, phone: _____.
4.	The scope of your personal data processed by the Company	<ol style="list-style-type: none"> <li>1. name (names) and surname, e-mail address;</li> <li>2. avatar; <ol style="list-style-type: none"> <li>a. in the case of solvers: telephone number, field of study, year of study, name of the university, content of answers to tasks, level, skills, career paths to which he has signed up, career paths he has joined, technologies he knows - through tags;</li> <li>b. in the case of the Lecturers: the name of the university and the name of the main university, the content of the tasks written, the subjects taught, the lessons conducted, the signature under the task, technologies that he knows - through tags;</li> <li>c. in the case of Clients - natural persons running a business: telephone number, company name and logo, content of tasks, career paths and skills, technologies that they need - through tags.</li> </ol> </li> </ol>
5.	Purpose / purposes of processing your personal data (including indication of the legal basis)	<p>The personal data provided by you is processed for the following purposes:</p> <ol style="list-style-type: none"> <li>a. provision of services as part of the Account and the Solver's / Lecturer's Profile in the Application, in particular access to the Application tools and databases as part of the Application (basis 6 (1) (b) of the GDPR);</li> <li>b. providing services as part of the Account and the Solving / Host's Profile in the Application, in particular to authenticate the User when logging in to the Application (based on 6 (1) (b) of the GDPR);</li> <li>c. marketing, provided that the given User expresses the relevant consents (based on 6 (1) (a) of the GDPR)</li> </ol>
6.	Categories of recipients of your personal data	<p>Your personal data may be transferred to the following entities processing data on behalf of the Company:</p> <ol style="list-style-type: none"> <li>a. Lecturers who have an active Account and Profile under the Application;</li> <li>b. Customers who have an active Account and Profile as part of the Application, provided that you start solving the Task entered by the Customer and consent to contact or consent to observe the Profile of a given Solver;</li> <li>c. entities providing legal, accounting and tax services to the Company.</li> </ol>

7.	Information on the intention to transfer personal data to a third country or an international organization	The company does not intend to transfer your personal data to a third country or an international organization.
8.	The period for which personal data will be stored	The personal data provided by you will be stored as long as you have an Account and Profile in the Application and for a period of 6 months after you delete your Account in the Application. After the expiry of the periods indicated above, your data is deleted or anonymized.
9.	The right to request the Administrator to access your personal data	You have the right to obtain confirmation of the processing of personal data, as well as to obtain a copy of the personal data subject to processing.
10.	The right to request the rectification of your personal data	If your data is incorrect or incomplete, you have the right to request the correction of your personal data.
11.	The right to request the deletion of your personal data	You have the right to request the deletion of your data, i.e. you are entitled to the so-called the right to be forgotten, unless the processing of your personal data is necessary for the establishment, exercise or defense of legal claims
12.	The right to request the restriction of the processing of your personal data	In the cases specified in Art. 18 GDPR, you have the right to request that the processing of your personal data be restricted.
13.	The right to object to the processing of your personal data	Due to the fact that the basis for the processing of personal data is not Art. 6 sec. 1 lit. e or f GDPR, you do not have the right to object to the processing of your data.
14.	The right to transfer your personal data	You have the right to receive, in a structured, commonly used, machine-readable format, your data provided to the Company and send this data to another administrator or request that the Company directly send this data to the designated administrator.
15.	The right to lodge a complaint with the supervisory authority	You have the right to lodge a complaint with the supervisory authority for compliance with the provisions on the protection of personal data when you feel that the processing of your personal data by the Company violates the GDPR.
16.	The right to withdraw consent	You may withdraw your consent to the processing of personal data at any time without affecting the lawfulness of the processing which was carried out on the basis of consent before its withdrawal.
17.	The principle of providing personal data	To register you in the Application, you must provide the data indicated in the Application. Providing data is voluntary, however, their absence results in the inability to register and provide services under the Application.

18.	Information on automated decision making, including profiling	The company does not make automated decisions, but performs profiling based on the data provided by you in order to position your own competences with the competences of other Solvers. Profiling is aimed at providing a cooperative model of cooperation in recruitment projects and matching recruitment projects to your needs and competences.
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#### V. Consent to use cookies (so-called cookies)

1. Platform Universality uses cookies. The information stored in these files allows the website to be adapted to the User's needs and is used for statistical purposes. All modern web browsers allow you to enable or disable the cookie mechanism (usually it is turned on by default). If the user using the Application does not disable the use of cookies in the browser, it means that he agrees to their use on this website.
2. By using the Application, you consent to the use of cookies.