

DEVICE Europe Privacy Policy

1. Introduction

Thank you for trusting DEVICE Europe with your personal data. We take our responsibility very seriously. This Privacy Policy explains how we collect, use, store, and protect your information when you visit our website (<https://deviceeurope.com>) or access any of our services ("Services"). It also outlines your privacy rights and the legal basis for our data processing activities. Please note that this policy applies only to data processing conducted by DEVICE Europe and does not cover information collected by third-party websites or in the context of recruitment and employment (which are governed by separate policies).

2. Who We Are

The data controller is DEVICE Europe Sp. z o.o., tel. +48 52 370 68 60,

The data controller can be contacted at:

- Legal Entity Name: DEVICE Europe Sp. z o. o.
- Company Registration Number: 0000161511
- Email Address: contact@deviceeurope.com
- Postal Address: Ernsta Petersona 4A, 85-862 Bydgoszcz Poland

User - a natural person entering the website/websites or using the services or functionalities described in this Policy.

Customer - a natural person having full legal capacity, a natural person who is a Consumer, a legal person or an organizational unit without legal personality.

Newsletter - information, including commercial information within the meaning of the Act of 18 July 2002 on the provision of electronic services (Dz. U. z 2020 r. poz. 344) from the Seller, sent to the Customer/User by electronic means; its receipt is voluntary and requires the consent of the Customer/User.

Account - a set of data stored in the controller IT-system concerning the Customer/User.

GDPR - Regulation (EU) 2016/679 of the European Parliament and of the Council 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.

Under applicable data protection laws and the EU General Data Protection Regulation (GDPR), DEVICE Europe acts as both a data controller (deciding how and why your personal data is processed) and, at times, as a data processor (processing data on behalf of others under strict instructions). Our website may include links to third-party sites; however, we do not control their content or data practices. We encourage you to review their privacy policies when you visit these sites.

3. What Personal Data Do We Process?

Information You Provide Directly

- **General Personal Data:** This includes any information you provide when you complete online forms, send us emails, participate in surveys, attend events, or otherwise interact with us. Typical details include your full name, job title, business name, contact details (email address, telephone number), and company information.

- **Financial Information:** If you are a supplier or engage with us commercially, you may supply financial details necessary to facilitate payments or process refunds. All such information is handled securely.
- **Verbal Communications:** If you provide personal information verbally and consent to its use, we will confirm this consent in writing.
- **Marketing Preferences:** Any details you share regarding your communication preferences or consent to receive marketing information from us or our partners.
- **Third-Party Data:** If you provide personal data relating to someone else (for example, an authorized representative), you confirm that you have obtained their consent and have shared this policy with them.

If you do not provide required personal data (where mandated by law or contractual necessity), we may be unable to provide you with our full range of Services.

Information Collected Automatically

- **Technical Data:** When you use our website, we may automatically collect data such as your IP address, browser type, operating system, geographic location, and pages visited. This is typically gathered via cookies and similar technologies. Although dynamic IP addresses may be logged by your internet service provider, no information is used to personally identify you.
- **Cookies and Similar Technologies:** Cookies help us analyze website traffic and tailor your experience. You can modify your browser settings to refuse cookies, though this may affect the functionality of our website.
- **Log Files and Web Beacons:** We use log files to record user actions and may use pixel tags to monitor how you interact with our website.

Information Received from Third Parties

- **Device Data:** This includes analytics provided by services like Google Analytics (operating within the EU) to monitor website performance.
- **Social media:** Publicly available information from social media platforms (e.g. Facebook, LinkedIn, Twitter) may be used if you interact with us via these channels.
- **Public Sources:** We may also obtain personal data from other publicly available sources, ensuring that any third parties involved adhere to data protection standards.

It is important to keep your personal information accurate and up to date. Please notify us of any changes during your relationship with DEVICE Europe.

4. What Information Is Not Collected?

Aside from incidental data collected through our Services, we do not intentionally collect sensitive or special category data (such as racial or ethnic origin, political opinions, religious beliefs, biometric data, or details of your sex life). We also do not knowingly collect data from children under the applicable legal age. If you are under the legal age in your country (or, in some regions, under 16), please do not provide personal data via our website.

5. How Is Your Information Used?

We process your personal data only when permitted by law. Generally, we use your data for the following purposes:

- **Contractual Necessity:** To fulfill contracts or agreements you have entered with us, including maintaining internal records and administering Services.
- **Legitimate Interests:** For purposes that are necessary for our business operations or for the benefit of a third party, provided these interests do not override your fundamental rights.
- **Legal and Regulatory Compliance:** To comply with our legal obligations and respond to regulatory requests.

6. Our Standard Business Operations

We use your personal data to:

- Deliver the Services and products you have requested.
- Communicate important information regarding our Services.
- Manage and maintain our internal records and customer relationships.

7. Marketing

We maintain separate contact lists for marketing communications. We will contact you with relevant information only if you have opted in to receive such communications. You may withdraw your consent at any time using the unsubscribe link provided in our emails or by contacting us directly. Opting out of marketing communications will not affect our ability to provide you with the Services you have requested.

8. Testimonials

Customer testimonials or comments may appear on our website or other platforms. We always obtain your consent in writing before publishing your personal data alongside your testimonial.

9. Change of Purpose

We will use your personal data solely for the purposes for which it was originally collected unless a new purpose, which is compatible with the original one, is identified. Should we need to use your data for an unrelated purpose, we will inform you and explain the legal basis for such processing.

10. Legal Requirements

We retain and use your data as required by law, which may include:

- Protecting our legal rights and ensuring our legal position.
- Sharing data with law enforcement or regulatory authorities where required.
- Facilitating the recovery of outstanding debts or other legal claims.

11. Website Administration and Customization

DEVICE Europe uses your data for various website administration and customization purposes, such as:

- Processing registration requests and providing the Services.
- Sending email updates and other communications.
- Customizing website content and advertising.
- Measuring website traffic and user engagement to improve our online experience.

12. Aggregated or Non-Identifying Information

We may collect and use non-identifying or aggregated information (such as anonymized feedback, user agent strings, or log file data) for statistical and research purposes. In some jurisdictions, IP addresses and similar identifiers may be considered personal data, and in such cases, we treat them accordingly.

13. What Information Is Shared?

We do not sell or trade your personal data to third parties. However, we may share your data within DEVICE Europe and with trusted partners or service providers in the following situations:

- Legal and Regulatory Requirements: With government agencies, regulators, or law enforcement when required.
- Business Transfers: In the event of a merger, sale, or transfer of assets, provided that any new party agrees to uphold your data's confidentiality.
- Professional Advisers: With lawyers, bankers, auditors, or insurers to fulfil our legal or contractual obligations.
- Third-Party Service Providers: With providers that assist with IT, email marketing, analytics, or data storage. These providers are contractually bound to protect your data and only use it for the specified purposes.
- Consent-Based Sharing: With third parties to communicate with you on our behalf, provided you have given your explicit consent.

14. How Is Your Information Secured?

DEVICE Europe takes every reasonable precaution to protect your personal data from unauthorized access, alteration, or destruction. We adhere to industry-standard security measures during transmission and storage. Access to your data is strictly limited to employees, agents, or contractors who require it for legitimate business purposes, and all such parties are bound by confidentiality obligations. In the event of a suspected data breach, we have procedures in place to notify both you and the relevant regulatory authorities as required by law.

15. How Is Information Collected and Stored Globally?

The data we collect is stored and processed in Poland and the European Union, subject to applicable data protection laws. We strive to meet the varied privacy expectations of our customers worldwide. Key practices include:

- Obtaining clear, informed consent when required.
- Collecting only the minimum amount of personal data necessary.
- Providing you with straightforward means to access, update, or delete your information.
- Ensuring that any data transfers comply with legal requirements (e.g., through standard contractual clauses or similar safeguards).

16. What If I Have a Complaint?

If you have any concerns about how DEVICE Europe is handling your personal data, please contact us immediately. You can reach us at contact@deviceeurope.com with the subject "Data Privacy." We aim to respond within 30 days. You may also contact our Data Protection Coordinator (DPO) directly at DPO@deviceeurope.com. If you are based in the EU and are unsatisfied with our response, you have the right to lodge a complaint with your local data protection authority.

17. Responding to Compelled Disclosure Requirements

In response to a valid subpoena, court order, warrant, or other governmental request—or when we believe disclosure is necessary to protect our rights or those of third parties—we may disclose your personal data. Where legally permitted, we will make a reasonable effort to notify you of such disclosures.

18. How Can I Access My Personal Information?

If you are a registered user, you can access and update your profile information through your account settings or by contacting us directly. Under applicable data protection laws, you have the right to:

- Access: Request a copy of your personal data.
- Correction: Request correction of any inaccurate or incomplete data.
- Erasure: Request deletion of your data (subject to certain legal limitations).
- Objection: Object to the processing of your data on grounds relating to your situation.
- Restriction: Request that we suspend processing of your data.
- Data Portability: Request a transfer of your data in a commonly used, machine-readable format.
- Withdrawal of Consent: Withdraw your consent for data processing, noting that this will not affect the lawfulness of processing before your withdrawal.

To exercise these rights, please contact us or our DPO. We may need to verify your identity before processing your request.

19. Data Retention and Deletion

We retain your personal data only as long as necessary to fulfil the purposes for which it was collected, including legal, accounting, or reporting obligations. In general:

- We retain customer information for a minimum period (e.g. six years after the end of a business relationship) as required by law.
- Data may be kept longer if needed to resolve disputes or enforce agreements.
- Where possible, we may anonymize your personal data for research or statistical purposes so that it is no longer associated with you.

To request deletion of your data, please email DPO@deviceeurope.com with "Deletion Request" in the subject line and specify the data or account concerned.

20. How Do We Communicate with You?

We primarily use your email address to communicate with you regarding Service updates, support, or marketing (if you have opted in). Our communications are sent to your primary email address, and we take care to protect your information. Some emails may contain a small tracking pixel to verify receipt; if you prefer not to have this used, please opt out of marketing communications.

21. Changes to Our Privacy Policy

DEVICE Europe reserves the right to update or modify this Privacy Policy at any time. If material changes are made, we will notify you by posting a prominent notice on our website or via email before the changes take effect. We encourage you to review this policy periodically to stay informed about how your data is protected. This version was last updated in 01/2025.

22. How Can You Contact Us?

If you have any questions or concerns regarding this Privacy Policy or our data handling practices, please contact us by reaching out to our Data Protection Coordinator at DPO@deviceeurope.com.

23. Legal

This Privacy Policy is governed by and interpreted in accordance with the laws of Poland. By using our website or Services, you agree that the courts of Poland shall have exclusive jurisdiction over any disputes arising out of or in connection with this policy.