

# COGITO CAPITAL PARTNERS PRIVACY POLICY

## GENERAL PROVISIONS

1. In order to secure the privacy rights of Cogito Capital Service users and to comply with applicable legal requirements, Cogito Capital hereby provides the Service's Users with this Privacy Policy, wherein Cogito Capital explains and informs them of the manner in which users' personal data is processed and secured.
2. Cogito Capital processes personal data in accordance with all applicable laws, including the GDPR.
3. Before beginning to use the Cogito Capital Service, Users should carefully read this Privacy Policy.

## DEFINITIONS

The capitalized terms used in this Policy shall have the following meanings:

**Policy** – this Privacy Policy

**Cogito Capital** – Cogito Capital Partners Sp. z o.o. Sp. k., with its registered office in Warsaw (00-071), Krakowskie Przedmieście 13.

**User** – a natural person whose personal data is processed by Cogito Capital in connection with their use of the Cogito Capital Service.

**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.

**Service** – the website <https://cogitocap.com/>

## COLLECTION AND PROCESSING OF DATA BY COGITO CAPITAL

4. Cogito Capital is the controller of personal data provided by Users when using the Service.
5. Cogito Capital ensures that Users can use its Service anonymously, however, in order to receive a newsletter, it is necessary for them to provide data in the form of an e-mail address.
6. With regards to business communications, the provision of personal data is voluntary, but it may be necessary in order to conclude and perform a contract (with respect to the personal data of sole traders).

## PURPOSES AND LEGAL BASIS FOR DATA PROCESSING

7. Cogito Capital processes the personal data of the Service's Users for the following purposes:

**a. sending newsletters**

Cogito Capital sends a free newsletter as well as other messages with information concerning Cogito Capital.

The legal basis for processing is Article 6(1)(a) of the GDPR (the User's consent to receive correspondence from Cogito Capital).

**b. ensuring the Service's security and functionality**

Cogito Capital processes personal data if necessary to ensure that Cogito Capital's information processing is secure and to manage the Service.

The legal basis for processing is Article 6(1)(f) of the GDPR (fulfilment of Cogito Capital's legitimate interest, i.e. ensuring that the Service is operational).

**c. pursuit of or protection against possible claims**

In the event of possible claims against Users, or the necessity of protecting against such claims, Cogito Capital may process Users' data obtained through the Service.

The legal basis for processing is Article 6(1)(f) of the GDPR (fulfilment of Cogito Capital's legitimate interest, i.e. protection against or pursuit of claims).

**d. processing personal data for business purposes**

Cogito Capital processes the personal data of the persons representing, or designated as contacts for, contractors, as well as the data of other persons for the purpose of business communications.

The legal basis for processing is:

- Article 6(1)(f) of the GDPR (fulfilment of Cogito Capital's legitimate interest, i.e. the ability to enter into or perform a contract with a contractor, protection against or pursuit of claims);

- Article 6(1)(b) of the GDPR (conclusion and performance of a contract – with respect to the data of sole traders).

**SOURCE OF PERSONAL DATA**

8. In the case of business communications, if the data was not provided by the data subject, the source of the personal data may be other employees/contractors of the entity with which Cogito Capital is about to enter into or has entered into a contract, or the personal data may have been obtained from a publicly available register (e.g. the National Court Register).

**SHARING OF PERSONAL DATA**

9. Access to Users' data may be granted to Cogito Capital's authorized employees and contractors, as well as entities whose services are used by Cogito Capital (e.g. IT service providers). In such cases, Cogito Capital has concluded agreements with said entities aimed at protecting the Users' data from unauthorized access.

#### **USER'S PRIVACY RIGHTS**

10. The User has the following rights in relation to their personal data processed by Cogito Capital as part of the Service:

- a. right of access to personal data**
- b. right to rectify personal data**
- c. right to withdraw consent**
- d. right to the erasure of personal data**
- e. right to restrict the processing of personal data**
- f. right to request a transfer of personal data**
- g. right to object to the processing of personal data**

11. To exercise any of these rights, Users may contact Cogito Capital via email at: [info@cogitocap.com](mailto:info@cogitocap.com).

12. If a breach of the regulations on the protection of personal is found to have occurred, the User has the right to lodge a complaint with the President of the Personal Data Protection Office.

#### **DATA RETENTION PERIOD**

13. Cogito Capital stores Users' personal data only for the period of time necessary to achieve the purposes for which the data was collected. After this time, the data is either deleted or anonymized in such a way as to render it impossible to establish a User's identity.

14. Personal data may be stored for longer periods of time if such a duty arises under law or is necessary in order to defend or enforce Cogito Capital's claims against Users.

15. Data processed on the basis of consent will be processed until consent is withdrawn.

#### **COOKIES**

16. Cookies used on the Cogito Capital Service can be managed through one's browser settings. For example:

(i) on Internet Explorer, Cookies can be disabled through the following settings: Tools/Internet Options/Privacy/Block All Cookies,

(ii) on Firefox, Cookies can be disabled through the following settings: Tools/Options/Privacy.

17. Blocking certain Cookies may impact the Service's functionalities.

**18.** The Cogito Capital Service use several types of Cookies, including:

**a. Session Cookies**

WordPress uses the cookie `wordpress_[hash]` to store the authentication details on login.

The

authentication details include the username and double hashed copy of the password.

However, this usage of the cookie is limited to the admin console area, the backend dashboard of the website.

The cookie `wordpress_logged_in_[hash]` is used to indicate when you are logged in, and who you are. This cookie is maintained on the front-end of the website as well when logged in. Here `[hash]` represents the value that is obtained by applying a specific mathematical formula applied to the username and password. It is to ensure that the input values are safe, and no one can access these data using the cookies as it is difficult to 'unhash' the hashed data.

The cookie `wp-settings-{time}-[UID]` is used to customize the view of your admin interface and the front-end of the website. The value represented by `[UID]` is the individual user ID of the user as given to them in the users' database table.

WordPress also sets a cookie named `wordpress_test_cookie` to check if the cookies are enabled on the browser to provide appropriate user experience to the users. This cookie is used on the front-end, even if you are not logged in.

**LINKS TO OTHER SITES**

**19.** This Policy only applies to the Service, the administrator of which is Cogito Capital. Cogito Capital is not responsible for links placed on the Service which enable Users to directly navigate to sites which Cogito Capital does not administer. We encourage Users to read the privacy notices available on the sites which links lead to.

**CONTACT DETAILS AND THE RIGHT TO LODGE A COMPLAINT**

**20.** Questions, conclusions and comments concerning the privacy policy and Cogito Capital's processing of User data should be sent via email to the following e-mail address: `info@cogitocap.com`, or in writing to: Cogito Capital Partners Sp. z o. o. Sp. k., with its registered office in Warsaw (00-071), Krakowskie Przedmieście 13.