

PRIVACY POLICY of ONORG Platform

Dear User, welcome to ONORG. We are glad that you visited our policy-related page to read the below rules.

ONORG is a unique social platform that gives you the possibility of free communication within a variety of Communities dedicated to the topics of your interest. We value your privacy; thus, we protect your personal data and we will process them solely to the extent necessary to perform our services unless you expressly authorize us to use your data to a greater extent.

We are aware how important it is for the content presented within ONORG not to be one of many advertisements. Therefore, the Administrators of individual Communities decide whether the advertisers may display their adverts within a given Community. The detailed terms governing the placement of advertisements are defined in the Terms and Conditions.

This document shall serve as a fulfillment of informative obligation imposed on the Administrator by the GDPR.

We Will Use the Below Definitions throughout this Document:

1. Platform or ONORG – a social platform available at www.onorg.co; it can be also available as a mobile application. The Platform shall be the property of Escape Velocity spółka z ograniczoną odpowiedzialnością sp. k. with the seat in Poznań (61-737) at ul. 27 grudnia 3.
2. User – a person registered on the Platform. A person who was invited as a member of a given Community and received a registration link, used the link, and created his/her Account on the Platform.
3. Account or Profile – a part of the Platform where personal data of a User and other information regarding such User are displayed. The Account is created when a given person registers as the User. The data, including personal data of the User provided in the Profile, are visible solely to the Users – members of the Community/-tieto which the User–Profile owner belongs.

4. Community – a group of Users within the Platform of formal (for example, a group operating as an association) or non-formal nature, managed by the Community Administrator.
5. Community Administrator – a User, who acts as an administrator of a given Community. Community Administrator is at the same time its founder or may appoint other Community Administrators or Community Moderators amongst other Users of a given Community.
6. Group – functionality (part) within a given Community, dedicated to a special topic. The Group is created by the User within the Community he/she is the member of. Moderator manages the content within the Group. The User–Group founder or a different User assigned by the current Moderator, acts as the Moderator of the Group.
7. Moderator – a User who acts as the person managing the content within a Community (Community Moderator) or a Group (Group Moderator), respectively.
8. Functionalities – functions of the Platform, whereas the scope of the functions depends whether the given user is granted basic permissions (of the User) or has been additionally granted Administrator or Moderator permissions.
9. Notification – one the Functionalities offered by the Platform, giving the possibility to send information about initiatives held within the Communities or Groups the User is a member of; Notifications are sent via the Platform, mobile Application or to User's email address, provided the User expressed his/her consent to receive Notifications.
10. GDPR – Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of natural persons regarding personal data processing and the free movement of such data, and repealing the Directive 95/46/EC.
11. Content – each content published by the User within the Platform. The Content may have a form of a text, graphics, photograph, sound, or any other form, as far as it is technically feasible to publish it on the Platform.
12. Privacy Policy – the herein document in its up-to-date version.

13. Terms and Conditions – The Terms and Conditions Governing the Provision of Services by the ONORG Platform.

§ 1 Controller and Contact Details

1. Escape Velocity spółka z ograniczoną odpowiedzialnością sp. k., with the seat in Poznań (61-737) at ul. 27 grudnia 3, is the Controller of the personal data gathered and processed within the ONORG platform (hereinafter referred to as the “Platform” or “ONORG”) – subject to section 3 below.
2. The Controller may be contacted via regular mail – by writing to the address provided above or via email – by sending an email to the following address: administrator@onorg.co.

§ 2 Data Types and Why Do we Process them

We will process your personal data which may be divided into several groups:

1. Data that you provide to us while creating your Account on the Platform – namely: first name, last name, email address, age, and login. If you invite another person to your Community, the information containing your login may appear in his/her Profile – as the inviting User.
 - You provide these data voluntarily, however, if you decide not to provide them, we will not be able to create the Account for you on the ONORG platform.
 - We collect and process these data to provide our services – namely, to ensure that the Functionalities of the Platform are operational, including, User identification, communication with the User, making it possible for the User to access the content published on the Platform, as well as ensure the possibility to publish content within Communities and Groups.
 - Moreover, we process your age details to make sure that you are over 13 years old. In line with the Terms and Conditions of the Platform, only persons who are over 13 years old may use ONORG.
 - If you decide to publish Content within ONORG – your personal data – first name, last name, and login – shall be available to other Users, as the

content you publish will be labelled with such details. Moreover, if the Community Administrator, which you belong to, decides that the Community is open, your personal data included in the Profile will be visible to other Users–Community members, which you belong to. Please, check the Community settings, prior to registering in the given Community, whether it is open, as by providing your personal data in the Profile, you agree that they are visible to other Users–Community members. Moreover, by publishing on the Platform, you agree that your first name, last name, and login will be made public (as well as your image, if you used your photo to create your avatar) – as these are the details that the Content published by you will be labelled with.

- The lawful bases for the processing of this personal data are set out in Art. 6 section 1b) of the GDPR.
 - We will process the data for as long as you are registered as the User. If you delete your Account on ONORG, we will erase the data from our systems and cease their processing.
2. Your image – if you decide to create your avatar using your image. You may send it to us when creating the Account on ONORG or add your photo to the Profile later. You may also use any other picture to create your avatar, ONORG does not require from you to send the User photo in order to render services to you – remember, however, not to violate someone else’s copyrights. You may also replace or delete your photo from your Profile at any time. If you delete your photo, it means that you withdraw your consent to further processing of this particular data by the Platform.
- You submit your photo to us voluntarily, its submission affects neither the possibility of registration nor the range of the Functionalities you will be able to use.
 - If you decide to publish the Content within ONORG, your photo, visible as your avatar, will be available to other Users because the content you wish to publish will be labelled with your avatar.
 - The lawful basis for the processing of the photo is your consent – namely, Art. 6 section 1a) of the GDPR.

- We will process your photo for as long as you do not withdraw your consent to its processing, however, not longer than until you delete your User account.

4. Your location – if you enabled the location sharing function.

- You provide your location data voluntarily if you wish other Users to see where you are at a given moment.
- We collect and process location data to render the service which assists Users located close to each other to meet face to face.
- You may withdraw your consent to the processing of your location data at any moment – by changing your Account settings.
- The lawful bases for the processing of your location data are set out in Art. 6 section 1a) of the GDPR.
- We will process your location data for as long as you are registered as the User and you have the Functionality displaying your location enabled.

§ 3 Our Marketing Objectives

Besides the purposes of personal data processing as described above, our Platform processes also your personal data for ONORG's marketing purposes. The marketing purposes of ONORG shall be deemed as the promotion of our services online and offline, as well as within the Platform – for example, to inform about new Functionalities of the Platform or offers prepared by us for the Users. By processing your personal data for our marketing purposes, we perform profiling operations, which means that we tailor the Content presented to you by automated means, based on the personal data you have provided to us. The lawful bases for the processing of this personal data are set out in Art. 6 section 1f) of the GDPR.

§ 4 Cookie Policy

1. If you agree to cookies, our Platform will process the data regarding your activity within the Platform. Cookies shall be stored on the device you use our Platform

on and enable us to identify the User activity within the Platform; if you wish to change cookie settings or withdraw your consent you have given to us in terms of cookie files, please change your browser settings. We use cookies to ensure the operation of the Platform's Functionalities, present profiled offers, and information as well as for statistical purposes regarding the User activity within the Platform. The lawful bases for the processing of such personal data based on cookies are set out in Art. 6 section 1a) of the GDPR.

2. If you withdraw your consent regarding cookies, or you change your browser settings, the Platform may not be able to correctly provide all its Functionalities to you.
3. Within cookies, we collect the following data: Internet protocol, IP address, website's URL, from which you were redirected and from which the file was requested, date and time of access, browser type and operating system, the website visited by the User, the amount of data provided, access status (file sent, file not found, etc.), duration and frequency of use.

§ 5 Consent Withdrawal and Objection

1. If you want us to cease the processing of your personal data, you may withdraw your consent given to us. You may withdraw the consent the same way you have provided it to us – for example, if you have given us your first name, last name and email address while registering your Account, you may withdraw your consent by deleting the personal data from your Account or disabling the given Functionality – for example, your location. Remember, however, that if you withdraw your consent to the processing of certain data, you may not be able to use the Platform (if you withdraw your consent to data processing, necessary to register the Account) or you may lose access to some of the Functionalities.
2. You have the right to object against personal data processing with regard to the data that we process based on separate lawful bases than your consent – for example, based on our legitimate interest. You should send your objection to our email address administrator@onorg.co or via regular mail to the Controller's address provided in §1 of the Privacy Policy.

3. Whenever you have questions or doubts, you may contact us using our email address administrator@onorg.co or by regular mail to the Controller's address provided in §1 of Privacy Policy).

§6 Who, besides the Controller, Will Have Access to Your Personal Data

1. To ensure Platform operation, we use the assistance of third parties. Considering the nature of the services rendered, some of these entities obtain access to your personal data – for example, suppliers of external browsers, servers, payment and mobile notification handling entities, location-based service providers and Platform-related statistical reporting systems operators. The entities obtain access solely to the data to the extent necessary to perform the contracts of such entities with ONORG. Detailed information regarding such entities that we provide data to – and the data provided – are available via email at administrator@onorg.co.
2. Some of the entities that get access to your personal data are established outside European Union, therefore, we will transfer your personal data outside EU. Relevant legal safeguards constitute the grounds for the transfer of your personal data outside the European Union, namely standard contractual clauses in terms of personal data protection, the wording of which has been approved by the European Committee. You may get the list of the entities outside the European Union to which we transfer your personal data via email at administrator@onorg.co.
3. We do not transfer your personal data to third parties running their own marketing activities – unless you give us your separate and express consent to such activity.

§7 Your Remaining Rights in Relation to the Personal Data Processed by Us

1. You have the right to information – you may request from us at any moment to provide to you the information about whether and what data we process, what is

the purpose of such processing and what are the detailed rules of such processing.

2. If your personal data that we process are not correct or are incomplete, you have the right to request their correction or supplementation.
3. You may request the restriction of your data processing – you are entitled to such request once you have requested the Controller to correct or delete your personal data and the Controller has not yet considered your request, and also once you have objected against the processing and the process of establishing the validity of your objection is not yet over.
4. If you feel that we process your personal data contrary to law, you may request data erasure or if you do not want to request erasure, you may request the Controller to limit your personal data processing.
5. You also have the right to request your personal data transfer. If you request us to do so, we will prepare and transfer your personal data in a file in a computer-readable format. You may also request us to transfer your personal data directly to a different controller – which we will do if it proves technically feasible.
6. If you want us to erase your personal data, you need to delete your Account from the Platform. You may also delete certain data from your Account – for example, email address. Remember that deleting your personal data from the Platform will cause that the Platform is no longer able to provide services to you and if you delete some of your personal data, it may cause that some of the Platform Functionalities will not be available any more. Once your personal data has been erased, the Platform shall retain the information regarding your activity on ONORG, including posts published by you, however, we will store and process them in an anonymized manner, namely, without the possibility to associate the data with a particular User.
7. We process your personal data solely to the extent necessary to provide the services by the Platform – if you do not use ONORG for a long time, we will consider that we no longer have the grounds to process your data. The Platform automatically deletes the Accounts of Users if we do not register a single logging into the given Account within 24 months.
8. You can direct to the Controller all requests that you are entitled to, via email to the following address administrator@onorg.co, or via regular mail to the

Controller's address provided at the beginning of this document. We will respond to your request without delay, within 14 days from receiving your request, the latest.

§ 8 Complaint to Supervisory Authority

In any case, if you decide that we process your personal data contrary to law, you may file a complaint against the Controller to the supervisory authority involved in personal data protection in the member state of your habitual residence, place of work or the place where the alleged violation occurred, which, for the persons residing or working at the territory of Poland, shall be the President of Personal Data Protection Office with the seat in Warsaw (00-193) at ul. Stawki 2. It is also possible to contact the President via website www.uodo.gov.pl

§ 9 Information about the Document

The wording of the document has been approved by way of the Resolution of the Board of the Controller – Escape Velocity spółka z ograniczoną odpowiedzialnością sp. k. with the seat in Poznań (61-737) at ul. 27 grudnia 3, dated 30.09.2020 the original document is available for inspection at the seat of the Controller.

The Controller shall be entitled to update the wording of the Privacy Policy at any time. The Controller shall inform the Users about any amendments by publishing the wording of the amended Privacy Policy on its website www.onorg.co, and sending the information about the document amendment to the User address.