

ins2outs PRIVACY POLICY

I. General

1. The terms used in this Privacy Policy shall mean:
2. **Star (also Co-Controller)** - Star Poland Sp. z o.o. with its registered office in Wrocław, at ul. Garbarska 1, 50-079 Wrocław, entered into the register of entrepreneurs of the National Court Register kept by the District Court for Wrocław Fabryczna 6th Commercial Division under KRS number 0000498888, Tax id. number (NIP) PL8971796885, REGON 022359132.
3. **i2o** – ins2outs platform developed and fully owned by Star under the following addresses: <https://ins2outs.io> and <https://ins2outs.com> offering a management system and know-how sets for Organizations to enable cooperation between Organizations and Consultants.
4. **Organization (also a Co-Controller)** - Entity holding an established account on i2o platform, which may invite its employees, co-workers or other entities and third parties to i2o for the purpose of proper quality management and know-how management in the Organization.
5. **User**-persons invited to use the i2o platform by the Organization or a Consultant.
6. **Consultant** - a person/Entity specializing in a particular field and providing advice on their area of expertise by means of i2o.
7. **Entity** - a person to whom personal data pertains, being a User, Consultant, Organization or any other person whose personal data are processed in connection with the use of i2o.
8. **Content** - policies, processes, procedures, instructions, ins/outs, document templates, documents, records, training, guidelines, tools, knowledge bits, normative sources, contexts, roles, data, documents,

multimedia files (graphics, audio and video) and any other materials made available under i2o.

9. **Know-how set** - a set of empirical and practical content that is important and useful, not publicly known or easily available, and that has been identified in an appropriate form which constitutes a collection of works within the meaning of the Copyright act. The know-how set having in particular the nature of policies, processes, procedures, instructions, ins/outs, documents templates, documents, records, training, guidelines, tools, normative sources, and roles, comprising a description of a management system, that was prepared by Star and delivered to an Organization's account on i2o.
10. **Ordered role** - a consulting role, e.g. a Quality Manager or an Information Security Officer, ordered by the Organization, and delivered in the "role-as-a-service" model by Star to the Organization.
11. This Privacy Policy is addressed to the Organizations, Users and Consultants and defines the type, scope, ways of using data by Star and the Organization, in particular personal data of entities using i2o, rights and obligations of the above mentioned persons and data protection. Failure to accept this Privacy Policy by the Organization, User or Consultant is tantamount to inability to use services provided electronically via the i2o platform.
12. The i2o Terms and Conditions are available at the following addresses: <https://ins2outs.io> and <https://ins2outs.com>
13. This Privacy Policy is an integral part of the i2o Terms and Conditions.

II. Data collected

1. Star is the Co-Controller of personal data of i2o Users and Consultants.
2. The second Co-Controller of personal data of i2o Users and Consultants in the

framework of a given Organization shall be the Organization for which an i2o account has been opened.

3. Star processes personal data in connection with the registration and maintenance of both Organizations' and Users' accounts on the i2o platform. In case the Organization wants to create an account on the i2o platform or invite a User or a Consultant who wants to use i2o, the Organization must provide personal data of these persons: e.g. first and last name, e-mail address, profile photo (used solely for personalizing the Entity's account and not used for any other purposes, including marketing, analytics, or third-party distribution), mobile phone number, and User's roles in the Organization.
The Organization, User or Consultant invited to use i2o by the Organization provides their data voluntarily, however refusal to provide them (except for a profile photo) prevents such an Entity from using the i2o platform.
4. In matters concerning the processing of personal data, you can contact Star by mail:
Star Poland Sp. z o.o.
ul. Grabarska 1
50-079 Wrocław
Poland
or by email:
gdpr.ins2outs@star.global.
5. Star may collect information about Organizations, Users and Consultants posted by these entities on the i2o platform, such as: Content, photos, text files, video and audio files, data concerning organizations and consultants, descriptions of skills, education, roles in particular organizations, names and surnames of Users and Consultants and the Organization, email addresses, mobile phone numbers, IP addresses from which connections are made, configuration of browsers, logs of activities performed and pages visited on the i2o and others.

III. Purposes and grounds for data processing

1. The following are the possible legal grounds for the processing of personal data by Co-Controllers:
 - a. **Consent** - a voluntary statement of the User, Consultant or Organization giving consent to the processing of data referred to in Article 6(1)(a) of the GDPR;
 - b. **Contractual requirements** - the need to have data available for the purpose of implementing the concluded agreement between an Organization and Star, as referred to in Article 6(1)(b) of the GDPR
 - c. **Statutory obligations** - fulfillment by Star or a Co-controller of the requirements resulting from the provisions of the law referred to in Article 6(1)(c) of the GDPR
In particular, if the i2o is used by the Authority to implement a safety management system, processing is intended to ensure that the Authority complies with the legislation referred to in Article 24(1) of the GDPR.
 - d. **The interest of the Co-Controller** - the pursuit of the legitimate interests of the Star or of the Organization as Co-Controller referred to in Article 6(1)(f) of the GDPR.
2. Based on the grounds for processing personal data presented above, Star processes or may process personal data of the Entity for the following purposes:
 - a. the provision of an ins2outs service to the Organization for which an account has been opened for the Entity (the basis of Article 6(1)(b) of the GDPR);
 - b. specified in consent, with the Entity being entitled to withdraw consent at any time, without prejudice to the lawfulness of the processing carried out on the basis of consent prior to its withdrawal; the refusal or withdrawal

- of consent will prevent Star from processing the data for the purposes specified in consent (based on Article 6(1)(a) of the GDPR);
- c. registration at i2o and use of i2o, including the presentation of content provided by the Organization or a Consultant, the exchange of content between Entities, which is a contractual requirement (the basis of Article 6(1)(b) of the GDPR);
 - d. the conclusion of contracts for the provision of services through i2o and the execution of payments for services provided through i2o, which is a contractual requirement (the basis of Article 6(1)(b) of the GDPR);
 - e. analytical (selection of services to meet the needs of the Entities; optimization of i2o operations on the basis of the Entities' comments on the subject, their interest, technical logs of applications; optimization of service processes on the basis of the course of processes, analysis of the Entities' behavior on the i2o websites, collection of demographic data or personalisation of the content of the i2o websites, including profiling), which constitutes the Controller's interest (basis under Art. 6.1(f) GDPR)
 - f. archival (evidence) in order to secure information in case of a legal need to prove facts, which is the Controller's interest (the basis of Article 6(1)(f) of the GDPR);
 - g. in order to measure the satisfaction of the Entities and to determine the quality of service, which is in the Controller's interest (the basis of Article 6(1)(f) of the GDPR);
 - h. in order to offer Products and services to Entities (direct marketing), including their selection according to the needs of Entities by means of profiling, which is in the Controller's interest (the basis of Art. 6.1.f of the GDPR);
- i. ensure the highest levels of security, including IT support, which is in the Controller's interest (the basis of Article 6(1)(f) of the GDPR);
 - j. in order to possibly establish, investigate or defend against claims what constitutes the Controller's interest (the basis of Article 6(1)(f) of the GDPR);
 - k. observance of relevant legal provisions, e.g. accounting, accounting, tax and other matters (the basis of Article 6(1)(c) of the GDPR).
3. Based on the grounds for processing personal data presented above, the Organization as a Co-controller processes or may process personal data of the Entity for the following purposes:
 - a. Definition, implementation and maintenance of the governance system of the Authority, in the interest of the Co-Controller (based on Article 6(1)(f) of the GDPR);
 - b. If the i2o is used by the Authority to implement a safety management system, processing is intended to ensure that the Authority complies with the legislation referred to in Article 24(1) of the GDPR.
- IV. **Period of data processing**
1. Data of Entities entered by the Organization will be processed by Star during the period of activity of the Organization's account. In the case of termination of an Entity's account on the Organization, personal data are processed still for a period of grace set individually for each Organization. After this period, personal data will be anonymized or deleted.
 2. All data of the Organization shall be processed during the period of activity of the account of the Organization. After deactivation of the Organization's account, its data may be

processed for a further period of 3 months to enable the Organization to return to the i2o service. After this period, the data of the Authority and its Affiliates shall be irretrievably deleted from i2o.

3. The period of data processing may be extended in situations where the law requires the storage of data in this respect and by the statute of limitations of possible claims for which it is necessary to dispose of personal data.
4. The period of data processing in the form of backups may be additionally extended by the period of rotation of these backups.

V. Disclosure of personal data to third parties

1. The collected personal data may be entrusted to entities other than Co-controllers for the purposes of the processing indicated above, i.e.
 - a) IT service providers;
 - b) Auditors, advisors;
 - c) Entities providing legal and accounting services; and
 - d) Entities which are entitled to obtain information on the basis of legal regulations.

VI. Rights of entities whose data are being processed

1. Entities have the right to demand, for each of the Co-Controllers:
 - a. have access to their personal data;
 - b. obtain an electronic copy of personal data;
 - c. correction of personal data in case of incompleteness, obsolescence or inaccurate data;

- d. deletion or limitation of personal data in circumstances provided for by law;
- e. object to the processing of personal data based on a legal basis in the interest of the Co-controller.

2. The Entity whose personal data are processed by Star on the basis of consent may revoke its consent to the processing of its personal data and its consent to receive commercial information electronically at any time, in any way ensuring access to Star's content of the above mentioned declaration of intent.
3. The exercise of the powers specified above shall be effected by transmitting a request to the Organization that has created the i2o account.
4. In addition, the Entities are entitled to lodge a complaint to the competent supervisory authority indicated in the Act currently in force regulating the principles of personal data processing.

VII. Transfer of data to third countries or international organizations

1. The i2o infrastructure is located within the European Economic Area in a standard configuration - the public cloud available at ins2outs.io address.
2. It is possible to configure the i2o instance on the infrastructure provided by the Organization - the private cloud configuration. In such a situation the Organization, as a Co-controller decides where the data is located.

VIII. Automatically collected data

1. Star processes data of the Entities characterizing the manner in which these Entities of their members use the service provided by electronic means (exploitation data), such as
 - a. information on the commencement, termination and

- scope of each use of the service provided by electronic means;
 - b. information on the use of the i2o service provided by electronic means by the Entities;
 - c. designations identifying the Organization, User or Consultant in the Star IT system, assigned on the basis of data provided by the Entities;
 - d. designations identifying the termination of the telecommunication network or the telecommunication and IT system used by the Entities to connect to i2o (IP, domain name, browser type, operating system type).
2. Cookies (so-called "cookies") are IT data, in particular text files, which are stored in the terminal equipment of the Entities and are intended to use the i2o domains. Cookies usually contain the name of the website from which they originate, the length of time they are stored on the terminal equipment and a unique number.
3. Cookies are used for the purpose of:
 - a. adapting the content of i2o websites to the preferences of the Entities and optimizing the use of the websites; in particular, these files make it possible to identify the Entity's device and to display a website tailored to the Entity's individual needs;
 - b. the production of statistics that help to understand how i2o websites are used by operators, thereby improving their structure and content;
 - c. maintaining the session of entities using i2o (after logging in), thanks to which the Entity does not have to re-enter the login and password on every i2o subpage.
4. The information generated by the cookie will not be used to personally identify the Entity and is not combined with personal data.
5. The Entity may manage and customize his/her cookie preferences through browser settings or specialized cookie consent management tools. The Entity acknowledges that disabling cookies may have an adverse effect on the functionality of i2o.
6. Star may use third-party analytics tools to help it better understand how users interact with i2o and to ensure its proper functionality, performance, and reliability. These tools may collect certain technical and usage data, such as device information, app usage statistics, and crash reports. This data is used solely to maintain and improve the operation of the platform and is processed in accordance with applicable data protection laws and the privacy policies of the respective third-party providers.
7. Star may introduce AI-enabled functionality on i2o to enhance user experience and make interaction with i2o more efficient. The AI technology Star may implement will not collect, process, or use any personal data that can be attributed to a specific person. Usage of AI features will be on opt-in basis for the organization and users may choose to continue using i2o without AI functionalities.

IX. Protection of personal data

1. Star applies the technical and organizational measures necessary to protect the data required by applicable laws. In particular, they protect the personal data of the Entities against unauthorized access, loss or damage. Star manages the i2o under its defined Information Security Management System (ISMS).
2. In order to prevent unauthorized persons from obtaining and modifying personal data transmitted by the Entities when using i2o, Star provides secure and encrypted communication channels and encrypts data at rest.
3. Actions taken by Star as a Co-controller may not be sufficient if the Organizations using i2o do not comply with the safety rules themselves. In particular, Entities should keep the login and password to the account confidential and not make them available to third parties. Star will not request them at any time. They should be used only for authentication purposes during the login process. In order to prevent unauthorized use of the account, the Entity should log out each time after using i2o and follow security best practices e.g. specified in ISO 27001 standard.
4. Star may, on a need-to-know basis, make available data of the Entities to its affiliates, including those located outside the EU. Such disclosure will be carried out in accordance with applicable data protection laws, including the GDPR. Where applicable, Star will implement appropriate safeguards as required under Article 46 of the GDPR. These safeguards may include the use of standard contractual clauses adopted by the European Commission, binding corporate rules, or other legally recognized mechanisms to ensure that data of the Entities remains protected. In addition to legal safeguards, Star will implement appropriate organizational and technical measures to ensure a level of security

appropriate to the risk, including but not limited to access controls, data encryption, and regular audits.

X. Final provisions

1. Provisions set out in the Privacy Policy are subject to Polish law or other provisions of generally applicable law.
2. Star is not responsible for the privacy and content posted on the i2o platform by the Entities. The above does not exclude the liability of the Co-Controllers resulting from the universally binding provisions of law.
3. Star will notify i2o users of any changes to this Privacy Policy, in the form of a message sent via i2o or other means, so that i2o users can review the changes before continuing to use i2o. If they object to any changes, the i2o user shall close their account. Your continued use of i2o after the

publication of a new version of this Privacy Policy constitutes your agreement to such changes.

4. The address provided in the chapter "XI. Contact" indicates the court having the jurisdiction over Star with respect to the Terms.

XI. **Contact**

If you have any questions or comments regarding use of i2o, please contact us at the following address:

Star Poland Sp. z o.o.
ul. Garbarska 1
50-079 Wrocław
Poland

Email: ins2outs@star.global