

PRIVACY POLICY OF THE PURE ALIGNER WEBSITE

This Website policy <https://purealigner.com> (hereinafter: the “**Privacy policy**”) defines and explains the principles and purpose of the Controller's processing of data, including the User's personal data in connection with the User's use of the website [https:// purealigner.com](https://purealigner.com) and related websites (hereinafter: the “**Website**”), other solutions, content and functionality available outside Pure Aligner's websites and relating to Pure Aligner's services, including Pure Aligner's social media profiles.

A. DEFINITIONS

1. **Controller** – Pure Aligner Sp. o.o. with its registered office in Warsaw (00-238), ul. Długa 29, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw, 12th Commercial Division of the National Court Register under KRS no. 0000876743, NIP [Tax Id No.]: 5252847684, REGON [Business Id No.]: 387859283, email address: bok@purealigner.com;
2. **User** – any person who uses the Website;
3. **GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council 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. (EU.L no. 119, p. 1);
4. **Website** – the website <https://purealigner.com> and related websites.

B. PERSONAL DATA

I. General provisions

1. The Controller is the controller of personal data within the meaning of the GDPR and other data protection regulations in force in the member states of the European Union and other regulations on the protection of personal data processed through the Website, as well as personal data obtained by the Controller through other solutions, content and functionalities available outside the Website and concerning Pure Aligner's services, including Pure Aligner's online social media profiles.
2. Contact with the Controller is possible in writing – to the address ul. Długa 29, 00-238 Warsaw or electronically – by e-mail at bok@purealigner.com or by telephone at +48 22 254 35 72.
3. The Controller has appointed the Data Protection Officer who can be contacted on all matters concerning the protection of personal data. The Data Protection Officer can

be contacted in writing at ul. Długa 29, 00-238 Warsaw or electronically – by e-mail at iod@tuf.pl or by telephone at +48 530 573 553.

4. The Controller takes special care to protect the interests of the data subjects, and in particular ensures that the collected data is processed in accordance with the law; collected for specified, legitimate purposes and not subject to further processing incompatible with these purposes; factually correct and adequate in relation to the purposes for which it is processed and stored in a form allowing identification of persons it concerns, no longer than it is necessary to achieve the purpose of processing.

II. Access data

The websites that make up the Website can be accessed without providing personal information. For each website call, the server automatically saves only:

- 1) the exact address of the website from which the website within the Website was redirected;
- 2) the exact address of the page viewed by the User within the Website;
- 3) the name of the User's operating system;
- 4) the name and version of the User's browser.

This data is analysed exclusively to ensure the proper functioning of the Website. It does not allow the User to be identified. Personal data left on the Website by the User is processed as described below.

III. Purpose and scope of data collection and recipients of data; basis for data processing

1. Your personal data, provided to the Controller by you, is processed for the purposes of:

- a. to communicate with you in relation to your request for an offer expressed by leaving your contact details in the contact form available on the Website and to provide you with an offer from Pure Aligner – on the basis of art. 6(1)(f) of the GDPR, i.e. on the basis of the legitimate interest pursued by the Controller, which is to provide an up-to-date offer from Pure Aligner at the request of a potential customer;
- b. to market the Controller's own products or services – on the basis of art. 6(1)(a) of the GDPR, i.e. on the basis of your freely given consent;

c. The provision of personal data is voluntary, however the provision of data in terms of name, last name, e-mail address or telephone number is necessary for the Controller to contact you in order to present you with a Pure Aligner offer or other Controller offer and (if you have given your consent) to present you with an offer of other Controller's products or services;

d. No automated decisions will be taken in relation to you, including as a result of profiling.

IV. Categories of data recipients

1. Your personal data may be disclosed to the following entities: employees and associates of the Controller, IT service providers, entities providing consultancy, legal, marketing, payment and other services necessary for the proper operation of the Controller and the services it provides. The legal basis for the transfer of data to service providers is art. 6(1)(b) and (f) of the GDPR.

2. Your personal data, may be made available to entities and authorities authorised to process such data by law. The legal basis for the transfer of data is art. 6(1)(c) and (f) of the GDPR.

V. Data storage period

1. Your personal data will be processed for the period necessary for the purposes for which the data are processed, or until you raise an objection (where the basis of the processing is the legitimate interest of the Controller) or until you withdraw your consent (where the basis of the processing is the consent you have given) – whichever occurs first.

2. Thereafter, the Controller will store the data until the statute of limitations for any claims.

C. MARKETING MESSAGES

1. Marketing messages, including offers or newsletters, are only sent to the Users who have given their consent and provided their e-mail address or telephone number. At any time, consent to receive marketing messages may be withdrawn by clicking on the opt-out link provided in each message or by contacting the Controller at the address below:

i. in writing – to the address ul. Długa 29, 00-238 Warsaw or

ii. electronically – to the e-mail address bok@purealigner.com or

iii. by telephone at +48 22 254 35 72

2. In particular, marketing messages may be sent to persons (always with their consent) who have provided the Controller with their personal data using social networks, i.e. in particular the website <https://www.facebook.com> and any other websites or applications linked to the website <https://www.facebook.com> or the Facebook social network (including international versions and applications/programmes for mobile phones), the rules of operation of which have been published by the entity responsible for these websites or applications, in particular at <https://www.facebook.com/legal/terms>, including by means of Facebook Lead Ads, which has as its purpose and serves the direct marketing of the Controller's own products or services. Within the scope of Facebook Lead Ads, the User shall only provide the Controller with the personal data that is each time included in the Facebook Lead Ads form, i.e. in particular: name, last name, e-mail address, telephone number. Facebook's rules for personal data processing are made available, for example, on the website: <https://www.facebook.com/policy.php>.

D. COOKIES

1. The Controller uses cookies as part of the operation of the Website.
2. Cookies are small pieces of information in the form of text files that are stored on the computer or browser of the person using the Website. Detailed information on cookies can be found, among other things, at the following link:
<https://pl.wikipedia.org/wiki/Ciasteczko>.
3. If personal data is processed using cookies, you will be expressly informed of this, as the Controller does not generally collect personal data using cookies.
4. The Controller uses:
 - a. transient cookies: i.e. files which are stored on the User's device each time until the end of the respective browser session. When the browser is closed, these files are permanently deleted from the device memory;
 - b. persistent cookies: files which are stored on the User's device until they are deleted – this means that, unlike session cookies, closing the browser does not delete persistent cookies.
5. The Controller processes or may process the data contained in the cookies during the User's use for the following purposes:
 - a. In the case of functional cookies (cookies that are technically necessary for the correct use of the Website), this involves the processing of information for the correct functioning of the Website, i.e:

- i. to adapt the Website to the User's preferences;
- ii. to optimise the use of the Website;
- iii. to remember the history of pages visited on the Website;
- iv. to customise the appearance of the Website, including font size, graphic layout, etc.;
- v. to compile anonymous statistics which help us to understand how Website Users use the Website;
- vi. to ensure the security and reliability of the Website.

The legal basis for the processing of personal data using cookies necessary for technical reasons is art. 6(1)(f) of the GDPR;

b. In the case of preferential cookies, statistical cookies (cookies used to determine the way and preferences of the User's use of the Website) and marketing cookies (cookies used to address the User with commercial information) – the Controller uses these cookies to analyse the way the User uses the Website. In order to analyse how the User uses the Website, the Controller uses the services of cooperating entities that use cookies (this is discussed in point 6 below)

If the Controller processes personal data using such cookies, it does so only with the User's consent, in which case the legal basis for the processing of personal data using cookies for preferential, statistical and marketing purposes is art. 6(1)(a) of the GDPR. With regard to personal data processed by means of preferential and statistical cookies, the legal basis is also art. 6(1)(f) of the GDPR, as the Controller has a legitimate interest in ensuring that the Website operates in an efficient and as effective and beneficial manner as possible for the User.

6. The Controller uses or may use cookies placed by entities cooperating with the Controller, through the Website, for the following purposes:

- a. to present multimedia content on the Website which is downloaded from www.youtube.com (Google Inc. based in the USA);
- b. to collect general and anonymous static data through the following tools:
 - i. Google Analytics (Google Ireland Ltd.);
- c. to use social media features to promote the Website or Pure Aligner:

- i. Facebook.com (Facebook Inc. based in the USA or Facebook Ireland based in Ireland);
- ii. Instagram.com (Facebook Inc. based in the USA or Facebook Ireland based in Ireland);
- iii. LinkedIn.com (LinkedIn Corp., based in the USA).

7. Generally, most Internet browsers available on the market accept cookies by default. Everyone has the possibility to define the conditions for using cookies in own browser's settings. This means that you can, for example, partially restrict (e.g. temporarily) or completely disable the option of saving cookies – in the latter case, however, it may affect some functionalities of the Website.

8. Browser settings in the scope of cookies are important from the point of view of consent to the use of cookies by the Controller – in accordance with the law, such consent can also be expressed through the settings of the web browser. In the absence of such consent, the browser's settings in the field of cookies should be changed accordingly.

9. Detailed information on how to change the settings for cookies and how to delete them yourself in web browsers is available in the help section of the User's web browser.

E. EXTERNAL WEB ANALYTICS SYSTEMS:

The Controller uses external web analytics systems that allow it to evaluate the functionality of the Website in an anonymised manner (i.e. without the User being identifiable).

The Controller uses the following web analytics systems:

I. Google Analytics

This system is provided by Google Ireland Ltd, based in Ireland. The system uses cookies to analyse the use of the Website. Each User has the option to block the transmission of data from electronic devices to Google Analytics by downloading and installing a free browser plug-in, available at: <https://tools.google.com/dlpage/gaoptout>.

Detailed information on how the above service collects and processes data is available at: www.google.com/intl/pl/policies/privacy/partners/.

II. Marketing Master Software system call tracking

The system is supplied by TUF Software SA, based in Poland.

1. it collects information regarding the page from which the User accessed the Website (e.g. by clicking on a link on the Facebook profile);
2. it assigns a telephone number to be displayed to a given User on the Website;
3. in addition to the address of the source page, this system collects information about the User's browser type, the User's IP address, the address of the destination page and the User's anonymised random browser ID.

Marketing Master Software system works on the basis of data that is completely anonymised and does not allow the User to be identified. It is necessary for the proper functioning and use of the Website and cannot be disabled by the User.

F. USER RIGHTS

1. You have the right of access to your personal data and the right to request its rectification, erasure or restriction of its processing.
2. You have the right to data portability, i.e. to receive from the Controller your personal data that you have provided to the Controller in a structured, commonly used machine-readable format. You may request the Controller to send this data to another controller.
3. To the extent that the processing of your personal data is based on the premise of a legitimate interest of the Controller, you have the right to object to the processing of your personal data.
4. If the User has given consent to the processing of personal data for the purpose of direct marketing of the Controller's own services, this consent may be revoked at any time.
5. In order to exercise the above rights, please contact the Controller or the Data Protection Officer using the contact details indicated below:
 - a. Contact with the Controller is possible in writing – to the address ul. Długa 29, 00-238 Warsaw, or electronically by e-mail at bok@purealigner.com or by telephone at +48 22 254 35 72;
 - b. The Data Protection Officer can be contacted in writing at ul. Długa 29, 00-238 Warsaw or electronically – by e-mail at iod@tuf.pl or by telephone at +48 530 573 553
6. Furthermore, you have the right to lodge a complaint with the supervisory authority in charge of personal data protection (the President of the Office for Personal Data Protection) if you believe that the processing of your data violates the GDPR.

G. CHANGES TO THE PRIVACY POLICY

The Controller may change this Privacy policy if at least one of the important reasons indicated in the catalogue below occurs:

1. a change in the provisions of the applicable law that governs the conduct of the Controller's business;
2. the need to adapt the content of the Privacy policy to current legislation or the need to make editorial changes to the Privacy policy that do not worsen the User's existing rights or obligations;
3. a change in the way in which the Website is run or operates, which is due to objective and independent reasons of a technological or technical nature;
4. a need to update the Controller's data indicated in the Privacy policy.

H. FINAL PROVISIONS

1. The Website may contain links to other websites. The Controller suggests that you also read the privacy policy of such a website when you visit it. This Privacy policy applies only to the Website.
2. The Controller uses technical and organisational measures to ensure that personal data being processed is protected adequately to hazards and categories of protected data, and in particular, protects the data against unauthorised access, being taken by an unauthorised person, processing in violation of applicable laws and changes, loss, damage or destruction.
3. The law applicable to this Privacy policy is the law of the Republic of Poland.
4. Contact for all support and technical assistance matters is via e-mail:
bok@purealigner.com