

## FACEBOOK:

### Privacy policy for social media

- in terms of processing data by LivUp Management limited liability company Poland general partnership for the purpose of managing a website on Facebook

#### 1. Personal Data Controller

In accordance with Article 4(7) of the GDPR, the controller of your personal data processed in connection with managing a website on the social media platform Facebook is **LivUp Management limited liability company Poland general partnership**, street Piękna 18, 00-549 Warsaw, registered in the register of entrepreneurs kept by the District Court for the Capital City of Warsaw in Warsaw, XIII Commercial Division of the National Court Register under number 0000995911 (hereinafter referred to as the "Company").

According to the ruling of the Court of Justice of the European Union dated June 5, 2018 (C-2010/16), Facebook is also a joint controller of your personal data processed by the Company in connection with managing the website on the social media platform.

More information about the processing of personal data by Facebook can be found at the following link: [Facebook's Privacy Policy](#).

#### 2. Data Protection Officer

Company has appointed a Data Protection Officer, who can be contacted towards data protection matters and the implementation of rights of natural person under the GDPR. Contact with the Data Protection Officer is possible via email at [iod@aurec-capital.pl](mailto:iod@aurec-capital.pl) or by traditional post at the Company's adres provided in point 1 above.

#### 3. Source of personal data collection

Company may collect your personal data in the cases below:

- a) if you follow the Company's website on the social media platform Facebook,
- b) if you add a comment or interact with content posted on the Company's website on the social media platform Facebook, e.g. clicking "like" on posts or photos,
- c) if you Contact with the Company using Facebook or Messenger,
- d) if you browse Company's website on the social media platform Facebook through the automatic collection of data regarding your activity.

#### 4. The purposes and the legal basis for processing personal data

Your personal data may be processed by Company in the following purposes:

- a) managing the website on the social media platform Facebook,
- b) responding to messages sent by Facebook or Messenger, e.g. questions about apartments which are you interested in,
- c) for marketing purposes,
- d) conducting statistical analyses,

- e) storing data for archival purposes.

## **5. Scope of processed personal data**

Due to the fact that you have Facebook account, you may share various personal data about yourself. It depends on your activity and your privacy settings. Depending on these factors, the Company may process the following personal data:

- a) name and surname,
- b) nickname,
- c) photos/image,
- d) all personal data which are available on your Facebook account, e.g. place of residence, email address, phone number, education, marital status,
- e) all personal data which you provide to the Company during conversations via Facebook, Messenger or in comments posted on the Company's website in the Facebook service, or left in contact forms (Facebook Lead Ads).

## **6. Period of storing personal data**

Your data will be stored by Company until the legitimate interests pursued by the Company as a controller terminates or until you file a valid objection to the processing. In case of the history of correspondence and responses given by Company to inquiries (for archival purposes) your data will be processed no longer than 3 years from the date of data collection.

The Company has no impact on the period of storing your personal data by the social media platform Facebook. They are collected and stored for a period resulting from the regulations and privacy policy of this service.

## **7. Recipients of personal data**

Your personal data may be disclosed to the following recipients:

- a) entities supporting the Company in terms of technical and IT services (including implementation and maintenance of software and IT equipment, hosting services, and other similar services),
- b) entities supporting the Company in managing website on the social media platform Facebook,
- c) entities supporting the Company with marketing, consulting, auditing, and advisory services,
- d) legal offices supporting the Company in legal services to the extent necessary to pursue claims or defend against claims.

## **8. Data transfer to the third countries or international organizations**

Your data may be transferred by the Company outside the European Economic Area (EEA). In that case, the Company applies personal data protection measures required by law, which are (depending on the case):

- a) data transfer to entities located in a third country in respect of which a decision has been issued confirming the appropriate level of protection, in accordance with the requirements of Art. 45 GDPR,
- b) data transfer, which realisation is based on legal agreement with third entities based on the Standard Contractual Clauses adopted by decision of the European Commission,
- c) data transfer realized under binding corporate rules referred to in Article 47 of the GDPR.

A natural person whose data is transferred to third countries has the right to obtain a copy of information about the security measures applied. You can obtain more information about security measures applied by the Company to ensure the security of data transferred outside the EEA by contacting via e-mail at [iod@aurec-capital.pl](mailto:iod@aurec-capital.pl) or by traditional post at the Company's adres.

In addition to the Company, Facebook may also transfer data to countries outside the EEA, particularly to the United States. To check how Facebook will process your data, you must read it's privacy policy.

## **9. Cookies**

The Company's website is managed on the social media platform Facebook. All cookies applied come from Facebook and Company has no influence on operations achieved using tchem. You can search more details connected with cookies applied by Facebook at the following link: [managing cookies by Facebook](#).

## **10. Statistics management**

The Company as a controller of the website hosted on Facebook receives access to information regarding the statistical behavior of website users. The Company may analyze this information in order to adapt the profile to user preferences. The statistical information to which the Company receives access is anonymized.

## **11. Advertisement on the social media platform Facebook**

Company applying tools, which are assured by Facebook may target you with advertisements that will be profiled based on your preferences. The above actions don't involve the automated processing of your personal data.

## **12. Your Rights Related to Data Processing by the Company**

Company ensures you the right to exercise the rights provided for in the GDPR, i.e.:

- a) the right of access to the personal data,
- b) the right to rectification of personal data,
- c) the right to erasure of personal data,
- d) the right to restriction of processing of personal data,
- e) the right to data portability,
- f) the Right to object at any time to the processing of personal data, on the principles and in the cases provided under the GDPR.

## **13. Right to lodge a complaint with a supervisory authority**

Company informs you about the right to lodge a complaint with a supervisory authority connected with processing your personal data if you consider that processing infringes the GDPR.

## **14. Automated processing, including profiling**

Your data are not processed in an automated manner that could lead to decisions having a legal impact on you or similarly significantly affecting your situation.

## **INSTAGRAM:**

### **Privacy policy for social media**

- in terms of processing data by LivUp Management limited liability company Poland general partnership for the purpose of managing a website on Instagram

### **15. Personal Data Controller**

In accordance with Article 4(7) of the GDPR, the controller of your personal data processed in connection with managing a website on the social media platform Instagram is **LivUp Management limited liability company Poland general partnership**, street Piękna 18, 00-549 Warsaw, registered in the register of entrepreneurs kept by the District Court for the Capital City of Warsaw in Warsaw, XIII Commercial Division of the National Court Register under number 0000995911 (hereinafter referred to as the "Company").

According to the ruling of the Court of Justice of the European Union dated June 5, 2018 (C-2010/16), a joint controller of your personal data processed by the Company in connection with managing the website on the social media platform is also administrator of the Instagram platform (belonging to Meta Platforms Ireland Limited).

More information about the processing of personal data by Instagram can be found at the following link: [Instagram privacy policy](#).

### **16. Data Protection Officer**

Company has appointed a Data Protection Officer, who can be contacted towards data protection matters and the implementation of rights of natural person under the GDPR. Contact with the Data Protection Officer is possible via email at [iod@aurec-capital.pl](mailto:iod@aurec-capital.pl) or by traditional post at the Company's adres provided in point 1 above.

### **17. Source of personal data collection**

Company may collect your personal data in the cases below:

- e) if you follow the Company's website on the social media platform Instagram,
- f) if you add a comment or interact with content posted on the Company's website on the social media platform Instagram, e.g. clicking "like" on posts or photos,
- g) if you Contact with the Company using Instagram
- h) if you browse Company's website on the social media platform Instagram through the automatic collection of data regarding your activity.

### **18. The purposes and the legal basis for processing personal data**

Your personal data may be processed by Company in the following purposes:

- f) managing the website on the social media platform Instagram,
- g) responding to messages sent by Instagram, e.g. questions about apartments which are you interested in,
- h) for marketing purposes,
- i) conducting statistical analyses,
- j) storing data for archival purposes.

## **19. Scope of processed personal data**

Due to the fact that you have Instagram account, you may share various personal data about yourself. It depends on your activity and your privacy settings. Depending on these factors, the Company may process the following personal data:

- f) name and surname,
- g) nickname,
- h) photos/image,
- i) all personal data which are available on your Instagram account, e.g. place of residence, email address, phone number, education, marital status,
- j) all personal data which you provide to the Company during conversations via Instagram or in comments posted on the Company's website in the Instagram service.

## **20. Period of storing personal data**

Your data will be stored by Company until the legitimate interests pursued by the Company as a controller terminates or until you file a valid objection to the processing. In case of the history of correspondence and responses given by Company to inquiries (for archival purposes) your data will be processed no longer than 3 years from the date of data collection.

The Company has no impact on the period of storing your personal data by the social media platform Instagram. They are collected and stored for a period resulting from the regulations and privacy policy of this service.

## **21. Recipients of personal data**

Your personal data may be disclosed to the following recipients:

- e) entities supporting the Company in terms of technical and IT services (including implementation and maintenance of software and IT equipment, hosting services, and other similar services),
- f) entities supporting the Company in managing website on the social media platform Instagram,
- g) entities supporting the Company with marketing, consulting, auditing, and advisory services,
- h) legal offices supporting the Company in legal services to the extent necessary to pursue claims or defend against claims.

## **22. Data transfer to the third countries or international organizations**

Your data may be transferred by the Company outside the European Economic Area (EEA). In that case, the Company applies personal data protection measures required by law, which are (depending on the case):

- d) data transfer to entities located in a third country in respect of which a decision has been issued confirming the appropriate level of protection, in accordance with the requirements of Art. 45 GDPR,

- e) data transfer, which realisation is based on legal agreement with third entities based on the Standard Contractual Clauses adopted by decision of the European Commission,
- f) data transfer realized under binding corporate rules referred to in Article 47 of the GDPR.

A natural person whose data is transferred to third countries has the right to obtain a copy of information about the security measures applied. You can obtain more information about security measures applied by the Company to ensure the security of data transferred outside the EEA by contacting via e-mail at [iod@aurec-capital.pl](mailto:iod@aurec-capital.pl) or by traditional post at the Company's adres.

In addition to the Company, Instagram may also transfer data to countries outside the EEA, particularly to the United States. To check how Instagram will process your data, you must read it's privacy policy.

### **23. Cookies**

The Company's website is managed on the social media platform Instagram. All cookies applied come from Instagram and Company has no influence on operations achieved using tchem. You can search more details connected with cookies applied by Instagram at the following link: [managing cookies by Instagram](#).

### **24. Statistics management**

The Company as a controller of the website hosted on Instagram receives access to information regarding the statistical behavior of website users. The Company may analyze this information in order to adapt the profile to user preferences. The statistical information to which the Company receives access is anonymized.

### **25. Advertisement on the social media platform instagram**

Company applying tools, which are assured by Instagram may target you with advertisements that will be profiled based on your preferences. The above actions don't involve the automated processing of your personal data.

### **26. Your Rights Related to Data Processing by the Company**

Company ensures you the right to exercise the rights provided for in the GDPR, i.e.:

- g) the right of access to the personal data,
- h) the right to rectification of personal data,
- i) the right to erasure of personal data,
- j) the right to restriction of processing of personal data,
- k) the right to data portability,
- l) the Right to object at any time to the processing of personal data, on the principles and in the cases provided under the GDPR

### **27. Right to lodge a complaint with a supervisory authority**

Company informs you about the right to lodge a complaint with a supervisory authority connected with processing your personal data if you consider that processing infringes the GDPR.

## 28. Automated processing, including profiling

Your data are not processed in an automated manner that could lead to decisions having a legal impact on you or similarly significantly affecting your situation.

## LINKEDIN:

### Privacy policy for social media

- in terms of processing data by LivUp Management limited liability company Poland general partnership for the purpose of managing a profile on LinkedIn

## 29. Personal Data Controller

In accordance with Article 4(7) of the GDPR, the controller of your personal data processed in connection with managing a website on the social media platform LinkedIn is **LivUp Management limited liability company Poland general partnership**, street Piękna 18, 00-549 Warsaw, registered in the register of entrepreneurs kept by the District Court for the Capital City of Warsaw in Warsaw, XIII Commercial Division of the National Court Register under number 0000995911 (hereinafter referred to as the "Company").

Joint controller of your personal data is also LinkedIn Ireland Unlimited Company. More information about the processing of personal data by LinkedIn can be found at the following link: [LinkedIn privacy policy](#)

## 30. Data Protection Officer

Company has appointed a Data Protection Officer, who can be contacted towards data protection matters and the implementation of rights of natural person under the GDPR. Contact with the Data Protection Officer is possible via email at [iod@arec-capital.pl](mailto:iod@arec-capital.pl) or by traditional post at the Company's adres provided in point 1 above.

## 31. Source, purposes and the legal basis for processing personal data

Company may collect your personal data in the following cases:

- a) if you adress a message to the Company through it's LinkedIn profile or to the contact details provided on the Company's profile, e.g. questions about apartments which are you interested in- in that case legal basis for processing your personal data is the legitimate interests pursued by the Company as a controller (art. 6 section 1 letter f GDPR),
- b) if you contact with the Company via a LinkedIn profile in response to a job offer- in that case legal basis for processing your personal data is art. 6 section 1 letter b and c GDPR,
- c) if you add a comment to the content posted on the Company's profile on LinkedIn- in that case Company process your data to enable commenting on our posts and other content, and the legal basis is art. 6 section 1 letter b GDPR,

- d) if you browse Company's profile through the automatic collection of data regarding your activity, which is the legitimate interests pursued by the Company as a controller (art. 6 section 1 letter f GDPR),
- e) for possible explanatory proceedings and determination, investigation or defense against claims - for the duration of any possible proceedings and for the period of limitation of possible claims, which constitutes the legitimate interests pursued by the Company as a controller (art. 6 section 1 letter f GDPR),
- f) archiving data to the extent necessary to fulfill the obligations arising from the above purposes imposed on the Company as the data controller - for the period indicated in the provisions on data archiving (art. 6 section 1 letter f GDPR),
- g) conducting statistical analyses, which is legitimate interests pursued by the Company as a controller (art. 6 section 1 letter f GDPR).

### **32. Scope of processed personal data**

The Company may process the following personal data:

- a) name and surname,
- b) nickname,
- c) all personal data which are available on your profile on LinkedIn, e.g. image, job position, place of employment, education, industry, contact details,
- d) all information which you provide to the Company during conversations via LinkedIn, in comments written on the Company's LinkedIn profile or in work applications, which you submit.

### **33. Period of storing personal data**

Your data collected based on the legitimate interests pursued by the Company as a controller will be stored until the legitimate interests pursued by the Company as a controller terminate or until you file a valid objection to the processing. In case of applying for a job offer your personal data will be stored for the duration of the recruitment procedure and - if you consent - stored for a period of one year for future recruitment purposes. In case of the history of correspondence and responses given by Company to inquiries, your data will be processed for no longer than 3 years from the date of data collection. The rest of the personal data will be stored for the period necessary to fulfill the purpose for which they were collected, e.g. for the period of publication of the comment.

The Company has no impact on the period of storing your personal data by the social media platform LinkedIn. They are collected and stored for a period resulting from the regulations and privacy policy of this service.

### **34. Freely provision of personal data**

Provision of your data in following purposes:

- a) sending a CV or responding to a job offer is necessary for you to participate in the recruitment process,
- b) implementing on the subject of the agreement (commenting on the content on the Company's profile on LinkedIn) is voluntary, but necessary if you want to respond to the content made available by the Company.



### **35. Recipients of personal data**

Your personal data may be disclosed to the following recipients:

- i) entities supporting the Company in terms of technical and IT services (including implementation and maintenance of software and IT equipment, hosting services, and other similar services),
- j) entities supporting the Company in managing website on the social media platform LinkedIn,
- k) entities supporting the Company with marketing, consulting, auditing, and advisory services,
- l) legal offices supporting the Company in legal services to the extent necessary to pursue claims or defend against claims.

### **36. Data transfer to the third countries or international organizations**

Your data may be transferred by the Company outside the European Economic Area (EEA). In that case, the Company applies personal data protection measures required by law, which are (depending on the case):

- g) data transfer to entities located in a third country in respect of which a decision has been issued confirming the appropriate level of protection, in accordance with the requirements of Art. 45 GDPR,
- h) data transfer, which realisation is based on legal agreement with third entities based on the Standard Contractual Clauses adopted by decision of the European Commission,
- i) data transfer realized under binding corporate rules referred to in Article 47 of the GDPR.

A natural person whose data is transferred to third countries has the right to obtain a copy of information about the security measures applied. You can obtain more information about security measures applied by the Company to ensure the security of data transferred outside the EEA by contacting via e-mail at [iod@aurec-capital.pl](mailto:iod@aurec-capital.pl) or by traditional post at the Company's adres.

In addition to the Company, LinkedIn may also transfer data to countries outside the EEA, particularly to the United States. To check how LinkedIn will process your data, you must read it's privacy policy.

### **37. Your Rights Related to Data Processing by the Company**

Company ensures you the right to exercise the rights provided for in the GDPR, i.e.:

- m) the right of access to the personal data,
- n) the right to rectification of personal data,
- o) the right to erasure of personal data,
- p) the right to restriction of processing of personal data,
- q) the right to data portability,
- r) the Right to object at any time to the processing of personal data, on the principles and in the cases provided under the GDPR.

### **38. Right to lodge a complaint with a supervisory authority**

Company informs you about the right to lodge a complaint with a supervisory authority connected with processing your personal data if you consider that processing infringes the GDPR.

### **39. Cookies**

In the case when you browse Company's profile on the social media platform LinkedIn data about your activity is automatically collected. You can define your preferences regarding the collection of activity data by cookies by accepting or rejecting cookies in the settings of your web browser, the settings of your device or in the LinkedIn cookie policy published on LinkedIn, which is available here: [cookies privacy policy LinkedIn](#).

The Company, as the controller of the profile hosted on LinkedIn, receives access to information regarding the statistical behavior of LinkedIn users using tools provided by LinkedIn. The Company may analyze this information in order to adapt the profile to user preferences. The statistical information to which the Company receives access is anonymized.

#### **40. Automated processing, including profiling**

Your data are not processed in an automated manner that could lead to decisions having a legal impact on you or similarly significantly affecting your situation.

### **YOUTUBE:**

#### **Privacy policy for social media**

in terms of processing data by LivUp Management limited liability company Poland general partnership for the purpose of managing a channel on Youtube

#### **41. Personal Data Controller**

In accordance with Article 4(7) of the GDPR, the controller of your personal data processed in connection with managing a website on the YouTube platform is **LivUp Management limited liability company Poland general partnership**, street Piękna 18, 00-549 Warsaw, registered in the register of entrepreneurs kept by the District Court for the Capital City of Warsaw in Warsaw, XIII Commercial Division of the National Court Register under number 0000995911 (hereinafter referred to as the "Company").

The Controller of your personal data, which is for processing personal data of all YouTube users is **Google Ireland Limited**. More information about the processing of personal data by Google Ireland Limited can be found at the following link: [YouTube privacy policy](#).

#### **42. Data Protection Officer**

Company has appointed a Data Protection Officer, who can be contacted towards data protection matters and the implementation of rights of natural person under the GDPR. Contact with the Data Protection Officer is possible via email at [iod@arec-capital.pl](mailto:iod@arec-capital.pl) or by traditional post at the Company's adres provided in point 1 above.

#### **43. Source, purposes and the legal basis for processing personal data**

Company may collect your personal data in the following cases:

- a) If you subscribe to the Company's channel on the YouTube platform- in that case Company processes your data in order to conclude a subscription agreement, and legal basis for processing is art. 6 section 1 letter b GDPR,
- b) If you add a comment to the content posted on the Company's channel on the YouTube platform- in that case Company processes your data to enable commenting on our posts and other content, and the legal basis is art. 6 section 1 letter b GDPR,
- c) if you browse on the Company's channel through the automatic collection of data regarding your activity, which is the legitimate interests pursued by the Company as a controller (art. 6 section 1 letter f GDPR),
- d) for possible explanatory proceedings and determination, investigation or defense against claims - for the duration of any possible proceedings and for the period of limitation of possible claims, which constitutes the legitimate interests pursued by the Company as a controller (art. 6 section 1 letter f GDPR),
- e) archiving data to the extent necessary to fulfill the obligations arising from the above purposes imposed on the Company as the data controller - for the period indicated in the provisions on data archiving (art. 6 section 1 letter f GDPR).

#### **44. Scope of processed personal data**

The Company may process the following personal data:

- e) name and surname,
- f) nickname,
- g) all personal data available on your YouTube channel, e.g. photo, comments you add under videos or on other users' channels, links to your accounts on other social media platforms
- h) all data contained in comments written to the content made available by the Company's channel on the YouTube.

Google Ireland Limited acting as a data controller has the right to process the personal data of each YouTube users for its own purposes, using other legal basis. More information about the processing of personal data by YouTube can be found here: [privacy policy YouTube.](#)

#### **45. Period of storing personal data**

Your data collected based on the legitimate interests pursued by the Company as a controller will be stored until the legitimate interests pursued by the Company as a controller terminate or until you file a valid objection to the processing. The rest of the personal data will be stored for the period necessary to fulfill the purpose for which they were collected, e.g. for the period of publication of the comment.

You can unsubscribe from the Company's channel subscription at any time. However, please note that Google Ireland Limited, as a separate data controller, may apply its own data storing periods on YouTube platform.

#### **46. Freely provision of personal data**

Provision of your data in following purposes:

- a) implementing on the subject of the agreement (commenting on the content on the Company's channel on Youtube platform or subscribing Company's channel on YouTube platform) ) is voluntary, but necessary if you want to respond to the content made available by the Company or subscribe channel.

#### **47. Recipients of personal data**

Your personal data may be disclosed to the following recipients:

- m) entities supporting the Company in terms of technical and IT services (including implementation and maintenance of software and IT equipment, hosting services, and other similar services),
- n) entities supporting the Company in managing Company's channel on Youtube platform,
- o) entities supporting the Company with marketing, consulting, auditing, and advisory services,
- p) legal offices supporting the Company in legal services to the extent necessary to pursue claims or defend against claims.

#### **48. Data transfer to the third countries or international organizations**

Your data may be transferred by the Company outside the European Economic Area (EEA). In that case, the Company applies personal data protection measures required by law, which are (depending on the case):

- j) data transfer to entities located in a third country in respect of which a decision has been issued confirming the appropriate level of protection, in accordance with the requirements of Art. 45 GDPR,
- k) data transfer, which realisation is based on legal agreement with third entities based on the Standard Contractual Clauses adopted by decision of the European Commission,
- l) data transfer realized under binding corporate rules referred to in Article 47 of the GDPR.

A natural person whose data is transferred to third countries has the right to obtain a copy of information about the security measures applied. You can obtain more information about security measures applied by the Company to ensure the security of data transferred outside the EEA by contacting via e-mail at [iod@aurec-capital.pl](mailto:iod@aurec-capital.pl) or by traditional post at the Company's adres.

In addition to Company, Google Ireland Limited may transfer your data to countries outside EEA, particularly to the USA, Chile, Taiwan (Republic of China) and Singapore. To verify how Google Ireland Limited may process your data, please read it's privacy policy.

#### **49. Your Rights Related to Data Processing by the Company**

Company ensures you the right to exercise the rights provided for in the GDPR, i.e.:

- s) the right of access to the personal data,
- t) the right to rectification of personal data,
- u) the right to erasure of personal data,
- v) the right to restriction of processing of personal data,
- w) the right to data portability,
- x) the Right to object at any time to the processing of personal data, on the principles and in the cases provided under the GDPR.

#### **50. Statistics management**

The Company, as the controller of the channel hosted on the YouTube platform, receives access to information regarding the statistical behavior of YouTube users YouTube provides measurement tools, including those for analyzing the number of impressions, views, and clicks in real time. The Company

may analyze this information in order to adapt the profile to user preferences. The statistical information to which the Company receives access is anonymized.

### **51. Cookies**

Company's channel is managed on the YouTube platform. All applied cookies come from YouTube and Company has no influence on operations achieved using them. You can search more details connected with cookies applied by YouTube at the following link: [privacy policy YouTube](#).

### **52. Right to lodge a complaint with a supervisory authority**

Company informs you about the right to lodge a complaint with a supervisory authority connected with processing your personal data if you consider that processing infringes the GDPR.

### **53. Automated processing, including profiling**

Your data are not processed in an automated manner that could lead to decisions having a legal impact on you or similarly significantly affecting your situation.