

## MOON FILMS SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ (LIMITED LIABILITY COMPANY) PRIVACY POLICY

Good morning! We are Moon Films sp. z o.o. with its registered seat in Warsaw. We are the controller of your personal data, including data collected via website [www.moonfilms.tv](http://www.moonfilms.tv).

This privacy policy (hereinafter "**Policy**") is a document in which we explain how your personal data is collected, processed, used and stored. The policy also describes your rights in scope of personal data processed by us.

If you have questions about your privacy, please send us an email to: [odo@moonfilms.tv](mailto:odo@moonfilms.tv). You can also send us a letter by post to the following address: Moon Films sp. z o.o., 51/53 Mokotowska Str., app. 13, 00-542 Warsaw, Poland, with the note "Personal Data".

Within the cooperation between us or your use of our services, including on our website, we may collect certain data that is necessary for the proper performance of the tasks entrusted to us, implementation of cooperation or operation and improvement of the tools provided (depending on the case).

At the same time, we would like to emphasize that Moon Films sp. z o.o. respects the privacy of all persons whose personal data it processes and pays special attention to their protection. Please read the terms of the Policy - it contains up-to-date information on the processing of your personal data by Moon Films sp. z o.o.

- I. **Controller: Moon Films spółka z ograniczoną odpowiedzialnością** (*limited liability company*) with its seat in Warsaw at 51/53 Mokotowska Str., app. 13, 00-542 Warsaw, entered into the register of entrepreneurs of National Court Register, registration files of which are kept by the District Court for the Capital City of Warsaw in Warsaw, 12th Commercial Division of the National Court Register, under the number KRS 0000624181, NIP 5842750862, REGON 64751767, share capital in the amount of PLN 50,000 – the entity providing the Policy and at the same time the controller of personal data to which the Policy applies (hereinafter "**Moon Films**" or "**Controller**").

Personal data collected by the Controller are processed in accordance with the principles set out in the provisions on the protection of personal data, in particular in 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 repealing Directive 95/46/EC (hereinafter: "**GDPR**").

- II. **Personal data:** means any information relating to an identified or identifiable natural person (hereinafter "**Data**"); an identifiable natural person is a person who can be directly or indirectly identified, in particular on the basis of an identifier such as name and surname, identification number, location data, internet identifier or one or more specific physical, physiological, genetic, mental factors, the economic, cultural or social identity of a natural person. Most often, Moon Films obtains Data to the extent necessary to conclude and perform the agreement, as well as to conduct marketing activities (e.g. newsletter), and typically these are: name, surname, postal address, e-mail address, telephone number and data to the invoice. Indirectly, we obtain Data as part of Cookies or similar technologies, which are left when navigating the Moon Films website.
- III. **Data Subject:** any natural person whose personal data is processed by the Controller.
- IV. **Processor:** means a natural or legal person, public authority, unit or other entity that processes personal data on behalf of the personal data Controller.
- V. **Data sources:** personal data and (if applicable) data of the company's contact persons (e.g. employees, associates who contact the Controller), as well as other persons whose data was provided with their knowledge and consent, the Controller obtained:
  - (a) **directly** from Data subject / directly from the Data subject / contact persons, as part of concluding or performing the concluded agreements, which may concern the performance of specific works for Moon Films or its Clients, as well as the contract under which Moon Films

provides certain services; during business meetings, at industry events or by exchanging business cards - for purposes related to initiating and maintaining business contacts, as well as as part of recruitment processes;

(b) **indirectly** as part of Cookies or similar technologies that are left when navigating the Moon Films website.

VI. **Contact regarding personal data:** any requests or questions related to the implementation of the Data Subject's rights may be submitted to the e-mail address: [odo@moonfilms.tv](mailto:odo@moonfilms.tv) or to the correspondence address: Moon Films sp. z o.o., 51/53 Mokotowska Str., app. 13, 00-542 Warsaw, Poland.

VII. **Purposes and legal grounds for processing:**

**Purposes:**

Performance of the agreement or activities aimed at its conclusion, contact with the client, correspondence, and the transfer of data to the client, publishing them as part of the clients's advertising campaigns (in the case of some agreements related to the implementation of advertising campaigns).

Statistical measurements.

Moon Films own marketing, including internet marketing, in particular as part of the presentation of Moon Films promotional materials and its achievements at various events, as well as on websites or presentations sent to clients.

Newsletters.

External marketing (third party marketing).

Establishing and maintaining business relations and informing about news from the Moon Films website.

**Legal grounds:**

Art. 6 sec. 1 letter B of GDPR (processing for the performance of the agreement)

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or, if the measurements are not necessary for the performance of the agreement  
art. 6 sec. 1 letter F of GDPR (legitimate interest of the Controller)

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Art. 6 sec. 1 letter A of GDPR (consent of the Data Subject)

Art. 6 sec. 1 letter F of GDPR (legitimate interest of the Controller)

Recruitment process: analysis of the candidate's profile, organization of a recruitment meeting and other activities potentially aimed at employment or starting cooperation. Based on a separate consent - also for the purposes of future recruitment processes.

Art. 6 sec. 1 letter A of GDPR (consent of the Data Subject)

Art. 6 sec. 1 lit. C of GDPR (processing necessary to meet the legal obligations imposed on the Controller), including in connection with art. 22<sup>1</sup> paragraph 1 of Labor Code

Art. 6 sec. 1 letter F of GDPR (legitimate interest of the Controller)

Tax, accounting and HR purposes, counteracting fraud and money laundering and other purposes resulting from the legal obligations of the Controller.

Art. 6 sec. 1 letter C of GDPR (processing necessary to meet the legal obligations imposed on the Controller)

VIII. **Retention period:** The Administrator processes the Data only as long as it is necessary. After achieving the goal, the Data will be deleted in accordance with the Administrator's policy regarding retention, unless the law requires the Administrator to keep them. Depending on the legal basis for processing, the Data may be processed for the following time:

- if the Data is necessary for the performance of the agreement - for the duration of the agreement and until the claims related to it expire,
- when the basis for data processing is the legitimate interest of the Controller - until an effective objection is made,
- if the Data is processed for tax, accounting, HR and anti-money laundering purposes - to the extent and for a period compliant with the applicable law,
- when the basis for data processing is consent - until its withdrawal, and - in the case of consent to the processing of data for the purposes of future recruitment - no longer than 2 years as of the consent.

IX. **Voluntary provision of Data:** providing Data is voluntary, but their provision may be a necessary condition for establishing and implementing cooperation, using services, tools or functionalities provided by Moon Films.

X. **Recipients:** The Controller may transfer the Data to other trusted processors, whom it entrusted certain activities, so as to provide the services as best as possible. In particular to:

- entities related directly or indirectly to the Controller,
- external service providers (e.g. IT, postal, courier services),
- entities providing accounting, legal, HR and promotional services to Moon Films,
- administration bodies and courts,
- other entities to which the Controller entrusted the processing of personal data on the basis of an agreement.

The data may be transferred to the competent state authorities only if the Controller is under a legal obligation under Art. 6 sec. 1 letter C of GDPR, only to the narrowest extent possible.

XI. **Data Subject Rights:** data subjects are entitled to the following rights:

- the right to information on the processing of personal data, including, in particular, the purposes and legal grounds for processing, the scope of the Data held, entities to which they are disclosed and the planned date of their removal,
- the right to obtain a copy of the Data,
- the right to rectify - the Controller is obliged to remove inconsistencies or errors in the processed personal data and supplement them if they are incomplete,
- the right to limit processing - in the event of such a request, the Controller ceases to perform operations on personal data - with the exception of operations for which the data subject has consented - and their storage, in accordance with the adopted retention rules or until the reasons for limiting the processing of Data cease to exist (e.g. a decision of the supervisory authority will be issued authorizing further data processing),

the right to transfer Data - on this basis - to the extent that the Data is processed in connection with the concluded contract or consent - the Controller issues the Data provided by the data subject in a format that can be read by a computer. It is also possible to request that the Data be sent to another entity - provided, however, that there are technical possibilities in this regard,

- the right to object to the processing of Data for marketing purposes at any time, without the need to justify such objection,
- the right to object to other purposes of personal data processing, which takes place on the basis of the legitimate interest of the Controller. The objection in this respect should contain a justification,
- the right to withdraw consent - if the Data is processed on the basis of consent, the Data Subject to which they relate has the right to withdraw it at any time, which does not affect the lawfulness of the processing carried out before the consent is withdrawn,
- the right to delete Data the processing of which is no longer necessary to achieve any of the purposes for which they were collected,
- the right to lodge a complaint - if it is found that the Data processing violates the provisions of the GDPR or other provisions on the protection of personal data, the Data Subject may submit a complaint to the President of the Personal Data Protection Office ([www.uodo.gov.pl](http://www.uodo.gov.pl)) or to a local the data protection authority of his/hers country of residence.

XII. **Data transfer to third countries (outside the EEA):** In principle, Moon Films does not plan the transfer of Data to third countries, i.e. those located outside the EEA (European Economic Area). However, if it is necessary for the performance of the agreement, or to initiate and maintain business contacts, or in the scope of recruitment processes, Moon Films may transfer the Data to the United Kingdom, where it has its office in London. Notwithstanding the foregoing, if the Data were to be transferred to any third country, all requirements resulting from the provisions of applicable law will be met. In the event that the transfer takes place to an entity located in a third country that does not ensure an adequate level of protection, the Controller applies protection measures, such as, for example, standard contractual clauses approved by the European Commission.

XIII. **No automated decision-making:** as part of marketing activities and activities related to the improvement of services, the Controller may analyze Data in IT systems using various filters and tools. Such activities may be performed by the Controller based on its legitimate interest (legal basis: Article 6 sec. 1 letter F of the GDPR), consisting in searching and grouping categories of people in order to determine what advertising messages may be of interest, as well as to improve the Controller's services. Based on the results of the activities described above, the Controller does not make any decisions with regard to the Data (subject) in an automated manner.

XIV. **Information on "Cookies":** in order to ensure the proper functioning of the services on the Moon Films website, the Controller performs the functions of obtaining information about users and their behavior, by saving files in the end devices - the so-called Cookies. Cookies are text files that are stored by the server on your computer or mobile device. Only the server that created them has access to Cookies. The text that is the content of Cookies often contains identifiers, page names, as well as numbers and characters. Cookies are unique to the browsers or mobile applications used by the User and allow websites to store various data, including the User's preferences. Like many other internet service providers, Moon Films uses Cookies to improve the user experience (UX). Session (*temporary*) cookies are deleted after each visit, and permanent cookies - remain for many visits. Cookies allow websites to remember the User's settings, such as the language, font size on the user's computer or mobile device, and other browser preferences. This means that the user does not have to set his preferences every time. Therefore, if the user does not use Cookies, websites will treat him as a new user each time he visits. Cookies can be managed and deleted at your own discretion. You can delete all Cookies stored on the user's device, and most of the web browsers allow you to block Cookies. However, in this case, it will be necessary to adjust the user's settings each time you visit the Controller's website. You can find out how to manage Cookies in the browser settings or on its dedicated website.

XV. **Changes/Information update:** The Policy is an up-to-date information on the processing of Data, and its content may change so that it complies with the actual principles of Data processing. The current Policy with information on the date of the last update is available on the website [www.moonfilms.tv](http://www.moonfilms.tv) and Moon Films recommends that you review it regularly.