

PRIVACY POLICY

I. INTRODUCTION

1. Elemental Holding SA with its registered office at: 20, rue Eugène Ruppert, L-2453 Luxembourg is the controller of personal data collected in particular via the website available at <https://elemental.biz> (hereinafter referred to as the Website), i.e., the entity deciding on how your personal data will be used (hereinafter referred to as the Controller or Elemental Holding).

Contact details of the Controller:

- 1) e-mail: office@elemental.biz,
- 2) correspondence address: Elemental Holding SA with its registered office: 20, rue Eugène Ruppert, L-2453 Luxembourg.

The data Controller is responsible for the security of provided personal data and the lawfulness of its processing.

2. In matters related to the processing of personal data and the exercise of data subject's rights in accordance with personal data protection laws, you can contact the Controller using the following e-mail address: gdpr@elemental.biz or the correspondence address provided above.
3. Your personal data is processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as GDPR), and other currently applicable personal data protection laws.
4. During a visit to the Website, the following data is collected:
 - 1) personal data provided by the Website user,
 - 2) data obtained and recorded automatically.
5. The purpose and scope of personal data used by the Controller is specified in detail hereinafter.

II. COLLECTED DATA – BASIC INFORMATION

1. The information below applies to all methods of using personal data provided by you by the Controller, indicated in Chapter III and IV.
2. The Controller will not use personal data to make decisions based solely on automated processing of personal data, including profiling within the meaning of Article 22 of the GDPR.
3. Under condition of maintaining all data security guarantees, personal data processed via the Website may be transferred to other entities, such as:
 - 1) entities authorized to receive it in accordance with legal regulations,
 - 2) entities processing it on behalf of the Controller, e.g., technical service providers, hosting service providers, analytical service providers, marketing agencies, and consulting service providers,
 - 3) other data controllers to the extent necessary to perform a contract, provide services and comply with legal requirements, e.g., other entities belonging to the Elemental Capital Group, notarial or law offices, companies providing postal and courier services, other counterparties providing services to the Controller under concluded contracts.
4. The Controller will not transfer your personal data to countries outside the European Economic Area (to countries other than European Union countries and Iceland, Norway, and Liechtenstein).
5. The Controller informs that in connection with the processing of personal data obtained via the Website, each data subject has the right to submit a request to:

- 1) access data (including to obtain information about what data is processed by the Controller and to what extent, and obtain a copy thereof – details: Article 15 of the GDPR),
 - 2) rectify data (i.e., correct it if the data processed by the Controller is incorrect or incomplete – details: Article 16 of the GDPR),
 - 3) delete data (if, for example, the data is no longer necessary to achieve the purposes for which it was collected or the Controller has no legal basis for the processing thereof – details: Article 17 of the GDPR),
 - 4) restrict data processing (if, for example, you question the accuracy of the personal data used by the Controller, if the data is no longer needed by the Controller, but must be processed due to claims pursued by you – details: Article 18 of the GDPR),
 - 5) object to the processing of personal data, including profiling (if personal data is processed based on the legitimate interest of the Controller or is used for direct marketing purposes – details: Article 21 of the GDPR),
 - 6) transfer data to another controller (if the processing of data transferred to the Controller is conducted in an automated manner, based on consent or on the basis of a contract – details: Article 20 of the GDPR),
 - 7) if the processing is carried out based on consent (e.g. consent to use data for marketing purposes, consent to use your image), you have the right to withdraw your consent in any way at any time (withdrawal of consent does not affect the processing of data that was carried out before submitting the declaration of withdrawal of consent).
6. Each data subject also has the right to lodge a complaint with the supervisory authority if he or she believes that the processing of personal data concerning him or her violates the GDPR. In the light of this “Privacy Policy”, the supervisory authority in Luxembourg: Commission nationale pour la protection des données (CNPd) 15, Boulevard du Jazz L-4370 Belvaux, phone (+352) 26 10 60 - 1, email: dpo@cnpd.lu, is the competent authority for the processing of personal data (more information available at: <https://cnpd.public.lu/fr/particuliers/faire-valoir/formulaire-plainte.html>). You can also lodge a complaint in the Member State of your habitual residence, place of work or place of the alleged violation.
7. Elemental Holding obtained the data directly from you. The Controller may also process:
- 1) personal data of other people provided by the user of the Website when using the services described in this “Privacy Policy”,
 - 2) personal data obtained from entities with which the Controller cooperates based on concluded contracts (e.g., business data of employees indicated as contact persons to perform a contract, data of persons participating in events organized by the Controller),
 - 3) personal data obtained from entities belonging to the Elemental Capital Group and other entities cooperating with the Controller, and the data was made available to the Controller based on your consent,
 - 4) data obtained from publicly available sources, e.g., the National Court Register (KRS), the Central Registration and Information on Economic Activity (CEIDG), websites.

III. PERSONAL DATA PROVIDED BY THE USER

III. A. E-MAIL OR PHONE CONTACT DETAILS

1. The Controller processes personal data, in particular name and surname, telephone number, e-mail address and other information provided by you, to the extent necessary to handle requests and inquiries, including to communicate and provide answers to questions asked using the e-mail address and contact telephone number provided on the Website (legal basis: Article 6(1)(f) of the GDPR – legitimate interest).

2. Provision of data is voluntary, but necessary to answer questions asked or to effectively manage the request and process the inquiry. Failure to provide personal data may result in the inability to respond or process the inquiry.
3. The Controller has the right to process personal data for the period necessary to manage the request and the inquiry, including to reply to a message sent or deal with matters, to which the correspondence or telephone conversation relates.

III. B. CONTACT FORM

1. The Controller may collect your personal data via the contact form available on the Website, in particular:
 - 1) name and surname,
 - 2) e-mail address,
 - 3) IP address,
 - 4) other information provided by you with the use of the form (e.g., company name, telephone number).
2. The Controller processes personal data only to the extent necessary:
 - 1) to receive and process a request, including exchange correspondence and provide answers to requests and questions submitted via the contact form (legal basis: Article 6(1)(f) of the GDPR – legitimate interest),
 - 2) to establish contact (using the selected communication channel) and to prepare and present a dedicated offer in response to the request of the Website user submitted via the form (legal basis: Article 6(1)(b) of the GDPR – acting at the request of the data subject before concluding a contract).
3. The Controller has the right to process personal data for the period necessary to achieve the above-mentioned purposes. Depending on the legal basis, this will be, respectively:
 - 1) the time necessary to process the request and respond to the inquiry sent by the user via the contact form,
 - 2) the time necessary to prepare and submit a dedicated offer.
4. Provision of data indicated in the contact form is voluntary, but necessary to effectively manage the request, answer questions asked or prepare and present a dedicated offer. Failure to provide personal data may result in the inability to respond, process the inquiry, or present the offer.

III. C. IRREGULARITY REPORTING FORMS

1. The Controller may collect personal data of employees, partners, and stakeholders of Elemental Holding who report irregularities via dedicated online forms, following the procedure of reporting irregularities applicable in the Elemental Capital Group. Detailed information on the processing of personal data is available on the GDPR bookmark on the website.

III. D. LINKEDIN

1. Elemental Holding is the Controller of personal data of persons using the services and products offered by LinkedIn Ireland Unlimited Company with its registered office: Wilton Place, Dublin 2, Ireland (hereinafter referred to as LinkedIn), who visit the Controller's website available at: <https://www.linkedin.com/company/elemental-holding-sa> (hereinafter referred to as the Company Website). As the Controller, the Company is responsible for the security of personal data provided and the processing thereof in a lawful way.
2. The Controller processes personal data of users who visit the Company Website when using LinkedIn products and services. The data is processed:
 - 1) in connection with maintaining the Company Website, including to promote one's own brand (legal basis: Article 6(1)(f) of the GDPR – legitimate interest),

- 2) to answer questions asked via the services offered by LinkedIn (legal basis: Article 6(1)(f) of the GDPR – legitimate interest); if the user provides specific categories of data (e.g. health information), he or she declares to have consented to the use thereof in order to properly handle the request and process the inquiry, including to communicate and respond (legal basis: Article 9(2)(a) GDPR – consent).
3. The Controller has the right to process:
 - 1) publicly available personal data (such as username, profile photo, activity status on LinkedIn), content of comments and other information publicly shared by the user using LinkedIn products and services,
 - 2) personal data provided by the user when visiting the Company Website, including to collect information provided in the user's profile and other content, comments, messages, and communications (e.g., photos, contact details, place of work, place of residence, information about education, interests, or ideological beliefs),
 - 3) other personal data provided by the user in the content of messages sent via LinkedIn services (including contact details and health information) to respond to a submitted inquiry or to comply with a contact request.
4. The scope of personal data processing, detailed purposes thereof, as well as the rights and obligations of the user of LinkedIn products and services result directly from:
 - 1) LinkedIn regulations (the document is available on the LinkedIn website at: <https://pl.linkedin.com/legal/user-agreement>) and
 - 2) "Privacy Policy" (the document is available on the LinkedIn website at: <https://pl.linkedin.com/legal/privacy-policy>) or
 - 3) provisions of law

- and become more specific a result of actions taken by the user on the LinkedIn social networking site.
5. The Controller has the right to process personal data for the period necessary to achieve the above-mentioned purposes. Depending on the legal basis, this will be:
 - 1) the time until objection is expressed (or a LinkedIn user account is deleted),
 - 2) the time until consent is withdrawn (or a LinkedIn user account is deleted). Withdrawal of consent does not affect the lawfulness of data processing conducted during the period when the consent was valid,
 - 3) the time necessary to process the inquiry sent by the user via LinkedIn services.
6. The list of recipients of personal data processed by the Controller results primarily from the scope of products and services used by the LinkedIn user, but also from the user's consent or provisions of law. Under condition of maintaining all data security guarantees, the Controller may transfer personal data of the user visiting the Company Website to other entities processing data on behalf of the Controller, e.g. technical service providers and advisory service providers (including law firms), as well as contractors providing services to the Controller on the basis of concluded contracts.
7. The Controller will not transfer personal data of a person using LinkedIn products and services to countries outside the European Economic Area (to countries other than European Union countries and Iceland, Norway, and Liechtenstein).
8. The Controller may process personal data of persons using LinkedIn products and services who visit the Company Website in order to analyze how users use the Controller's website and related content (to keep statistics) – in the case when using by the user of the Company Website and related content triggers creation of an event in the website statistics, which involves the processing of personal data (legal basis: Article 6(1)(f) of the GDPR – legitimate interest).

9. In the case of personal data processed for the purpose of keeping statistics of activities taken by a user on the Company Website (such as following or unfollowing the Company Website, recommending the Company Website in a post or comment), Elemental Holding and LinkedIn are joint controllers of users' personal data. The types of data and the scope of its processing as well as the rules of privacy protection and user rights are specified in detail:
 - 1) in this document,
 - 2) in the "Privacy Policy" published on the LinkedIn website at: <https://pl.linkedin.com/legal/privacy-policy>,
 - 3) in the "Page Insights Joint Controller Addendum", published on the LinkedIn website at: <https://legal.linkedin.com/pages-joint-controller-addendum>.
10. LinkedIn is responsible for notifying users using LinkedIn products and services about data processing for the purposes of page statistics and for enabling them to exercise their rights in accordance with the GDPR (information on the data used to create page statistics is available on the LinkedIn website at: <https://pl.linkedin.com/legal/privacy-policy>).
11. You can contact LinkedIn's data protection officer via the form available at: <https://www.linkedin.com/help/linkedin/ask/TSO-DPO>.

III. E. FACEBOOK

1. Elemental Holding is the Controller of personal data of persons using the services and products offered by Meta Platforms Ireland Limited with its registered office at: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (hereinafter referred to as Meta), who visit the Controller's company website available at: <https://www.facebook.com/elementalholding> (hereinafter referred to as the Fan Page). As the Controller, the Company is responsible for the security of personal data provided and the processing thereof in a lawful way.
2. The Controller processes personal data of users who visit the Fan Page when using Meta products and services. The data is processed:
 - 1) in connection with maintaining the Fan Page, including to promote one's own brand (legal basis: Article 6(1)(f) of the GDPR – legitimate interest),
 - 2) to answer questions asked via Messenger or other services offered by Meta (legal basis: Article 6(1)(f) of the GDPR – legitimate interest); if the user provides specific categories of data (e.g. health information), he or she declares to have consented to the use thereof in order to properly handle the request and process the inquiry, including to communicate and respond (legal basis: Article 9(2)(a) GDPR – consent).
3. The Controller has the right to process:
 - 1) publicly available personal data (such as username, profile photo, activity status on Facebook or Messenger), content of comments and other information publicly shared by the person using Meta products and services,
 - 2) personal data provided by the user when visiting the Fan Page, including to collect information provided in the user's profile and other content, comments, messages, and communications (e.g., photos, movies, contact details, information about interests or ideological beliefs, place of residence),
 - 3) other personal data provided by the user in the content of messages sent via Messenger or other Meta services (including contact details and health information) to respond to a submitted inquiry or to comply with a contact request.
4. The scope of personal data processing, detailed purposes thereof, as well as the rights and obligations of the user of Meta products and services result directly from:
 - 1) Facebook regulations (the document is available at: <https://www.facebook.com/legal/terms>) and

- 2) "Data Policy" (the document is available at: <https://www.facebook.com/policy>) or
 - 3) provisions of law
- and become more specific a result of actions taken by the user on the Facebook social networking site.
5. The Controller has the right to process personal data for the period necessary to achieve the above-mentioned purposes. Depending on the legal basis, this will be:
 - 1) the time until objection is expressed (or a Facebook user account is deleted);
 - 2) the time until consent is withdrawn (or a Facebook user account is deleted). Withdrawal of consent does not affect the lawfulness of data processing carried out during the period when the consent was valid,
 - 3) the time necessary to process the inquiry sent by the user via Messenger or other Meta services.
 6. The list of recipients of personal data processed by the Controller results primarily from the scope of products and services used by the Facebook user, but also from the user's consent or provisions of law. Under condition of maintaining all data security guarantees, the Controller may transfer personal data of the user visiting the Fan Page to other entities, including entities processing data on behalf of Elemental Holding, e.g. technical service providers and advisory service providers (including law firms), as well as contractors providing services to the Controller on the basis of concluded contracts.
 7. The Controller will not transfer personal data of a person using Meta products and services to countries outside the European Economic Area (to countries other than European Union countries and Iceland, Norway, and Liechtenstein).
 8. The Controller may process personal data of persons using Meta products and services who visit the Fan Page in order to analyze how users use the Controller's website and related content (to keep statistics) – in the case when using by the user of the Fan Page and related content triggers creation of an event in the website statistics, which involves the processing of personal data (legal basis: Article 6(1)(f) of the GDPR – legitimate interest).
 9. In the case of personal data processed for the purpose of keeping statistics of activities taken by a user on the Fan Page (such as following or unfollowing the Fan Page, recommending the page in a post or comment, liking the page or post, canceling the like), Elemental Holding and Meta are joint controllers of users' personal data. The types of data and the scope of its processing as well as the rules of privacy protection and user rights are specified in detail:
 - 1) in this document,
 - 2) in the "Privacy Policy" published at: <https://www.facebook.com/privacy/policy>,
 - 3) in the "Information about website statistics" published on the website: https://www.facebook.com/legal/terms/page_controller_addendum.
 10. Meta is responsible for notifying persons using Meta products and services about data processing for the purposes of page statistics and for enabling them to exercise their rights in accordance with the GDPR (information on the data used to create page statistics is available at: https://www.facebook.com/legal/terms/information_about_page_insights_data).
 11. You can contact Meta's data protection officer via a dedicated form available at: <https://www.facebook.com/help/contact/540977946302970>.

III. F. YOUTUBE

1. Elemental Holding is the Controller of personal data of persons using the services and products offered by Google Ireland Limited with its registered office at: Gordon House, Barrow Street, Dublin, D04 E5W5, Dublin, Ireland (hereinafter referred to as Google), as part of the YouTube

website, who visit the Controller's website available at: <https://www.youtube.com/@elementalholdinggroup> (hereinafter referred to as the Company Channel). As the Controller, the Company is responsible for the security of personal data provided and the processing thereof in a lawful way.

2. The Controller processes personal data of users who visit the Company Channel using YouTube products and services. The data is processed:
 - 1) in connection with maintaining the Company Channel, including to promote one's own brand (legal basis: Article 6(1)(f) of the GDPR – legitimate interest),
 - 2) to answer questions asked via YouTube or other services offered by Google (legal basis: Article 6(1)(f) of the GDPR – legitimate interest); if the user provides specific categories of data (e.g. health information), he or she declares to have consented to the use thereof in order to properly handle the request and process the inquiry, including to communicate and respond (legal basis: Article 9(2)(a) GDPR – consent).
3. The Controller has the right to process:
 - 1) publicly available personal data (such as username, profile photo, activity status on YouTube), content of comments and other information publicly shared by the person using YouTube products and services,
 - 2) personal data provided by the user visiting the Company Channel, including to collect information provided in the user's profile and other content, comments, messages, and communications (e.g., photos, videos, contact details, information about interests or ideological beliefs, place of residence),
 - 3) other personal data provided by the user in the content of messages sent via YouTube or other Google services (including contact details and health information) to respond to a submitted inquiry or to comply with a contact request.
4. The scope of personal data processing, detailed purposes thereof, as well as the rights and obligations of the person using YouTube products and services result directly from:
 - 1) YouTube regulations (the document is available on the YouTube website at: <https://www.youtube.com/intl/pl/about/policies/#community-guidelines>) and
 - 2) the "Privacy Policy – privacy and terms" document (the document is available on the Google website at: <https://policies.google.com/privacy>) or
 - 3) provisions of law- and become more specific a result of actions taken by the user on YouTube.
5. The Controller has the right to process personal data for the period necessary to achieve the above-mentioned purposes. Depending on the legal basis, this will be:
 - 1) the time until objection is expressed (or a YouTube user account is deleted),
 - 2) the time until consent is withdrawn (or a YouTube user account is deleted). Withdrawal of consent does not affect the lawfulness of data processing carried out during the period when the consent was valid,
 - 3) the time necessary to process the inquiry sent by the user via YouTube or other Google services.
6. The list of recipients of personal data processed by the Controller results primarily from the scope of products and services used by the YouTube user, but also from the user's consent or provisions of law. Under condition of maintaining all data security guarantees, the Controller may transfer personal data of the user visiting the Company Channel to other entities, including entities processing data on behalf of Elemental Holding, e.g. technical service providers and advisory service providers (including law firms), as well as contractors providing services to the Controller on the basis of concluded contracts.

7. The Controller will not transfer personal data of a person using YouTube products and services to countries outside the European Economic Area (to countries other than European Union countries and Iceland, Norway, and Liechtenstein).
8. The Controller may process personal data of persons using YouTube products and services who visit the Company Channel in order to analyze how users use the Controller's website and related content (to keep statistics) – in the case when using by the user of the Company Channel and related content triggers creation of an event in the website statistics, which involves the processing of personal data (legal basis: Article 6(1)(f) of the GDPR – legitimate interest).
9. In the case of personal data processed for the purpose of keeping statistics of activities taken by a user on the Company Channel (such as following or unfollowing the Company Channel, recommending the Company Channel in a post or comment, liking a movie, canceling the like), Elemental Holding and Google are joint controllers of users' personal data. The types of data and the scope of its processing as well as the rules of privacy protection and user rights are specified in detail:
 - 1) in this document,
 - 2) the “Google Privacy Policy” document published on the Google website at: <https://policies.google.com/privacy>,
10. Google is responsible for notifying persons using YouTube products and services about data processing for the purposes of page statistics and for enabling them to exercise their rights in accordance with the GDPR (information on the data used to create page statistics is available at: <https://policies.google.com/privacy>).
11. You can contact Google's data protection officer at the following e-mail address: data-protection-office@google.com.

III. G. X (former TWITTER)

1. Elemental Holding is the Controller of personal data of persons using products and services offered by:
 - 1) Twitter International Unlimited Company with its registered office at: One Cumberland Place, Fenian Street Dublin 2, D02 AX07 Ireland (if the user lives in a European Union country, EFTA country or in the United Kingdom),
 - 2) X Corp. with its registered office at: 1355 Market Street, Suite 900 San Francisco, CA 94103 (if the user lives in the United States or any other country outside the European Union, non-EFTA country or country other than the United Kingdom)
 (hereinafter referred to as X), who visit the company website of Elemental Holding available at: https://x.com/EH_Group_SA (hereinafter referred to as the Company Account). As the Controller, the Company is responsible for the security of personal data provided and the processing thereof in a lawful way.
8. The Controller processes personal data of users who visit the Company Account using products and services of X. The data is processed:
 - 1) in connection with maintaining the Company Account, including to promote one's own brand (legal basis: Article 6(1)(f) of the GDPR – legitimate interest),
 - 2) to answer questions asked the services offered by X (legal basis: Article 6(1)(f) of the GDPR – legitimate interest); if the user provides specific categories of data (e.g. health information), he or she declares to have consented to the use thereof in order to properly handle the request and process the inquiry, including to communicate and respond (legal basis: Article 9(2)(a) GDPR – consent).
9. The Controller has the right to process:

- 1) publicly available personal data (such as username, profile photo, activity status on the X website), content of comments and other information publicly shared by the person using X products and services,
 - 2) personal data provided by the user visiting the Company Account, including to collect information provided in the user's profile and other content, comments, messages, and communications (e.g., photos, videos, contact details, information about interests or ideological beliefs, place of residence),
 - 3) other personal data provided by the user in the content of messages sent via X services (including contact details and health information) to respond to a submitted inquiry or to comply with a contact request.
10. The scope of personal data processing, detailed purposes thereof, as well as the rights and obligations of the person using X products and services result directly from:
 - 1) X regulations (the document is available at: <https://help.x.com/pl/rules-and-policies/x-rules>) and
 - 2) "X Privacy Policy" (the document is available at: <https://x.com/en/privacy>) or
 - 3) provisions of law- and become more specific a result of actions taken by the user on the X website.
11. The Controller has the right to process personal data for the period necessary to achieve the above-mentioned purposes. Depending on the legal basis, this will be:
 - 1) the time until objection is expressed (or an X website user account is deleted),
 - 2) the time until consent is withdrawn (or an X website user account is deleted). Withdrawal of consent does not affect the lawfulness of data processing carried out during the period when the consent was valid,
 - 3) the time necessary to process the inquiry sent by the user X services.
12. The list of recipients of personal data processed by the Controller results primarily from the scope of products and services used by the X website user, but also from the user's consent or provisions of law. Under condition of maintaining all data security guarantees, the Controller may transfer personal data of the user visiting the Company Account to other entities, including entities processing data on behalf of Elemental Holding, e.g. technical service providers and advisory service providers (including law firms), as well as contractors providing services to the Controller on the basis of concluded contracts.
13. The Controller will not transfer personal data of a person using X products and services to countries outside the European Economic Area (to countries other than European Union countries and Iceland, Norway, and Liechtenstein).
14. The Controller may process personal data of persons using X products and services who visit the Company Account in order to analyze how users use the Controller's website and related content (to keep statistics) – in the case when using by the user of the Company Account and related content triggers creation of an event in the website statistics, which involves the processing of personal data (legal basis: Article 6(1)(f) of the GDPR – legitimate interest.
15. In the case of personal data processed for the purpose of keeping statistics of activities taken by a user on the Company Account (such as following or unfollowing the Company Account, recommending the Company Account), Elemental Holding and X are joint controllers of users' personal data. The types of data and the scope of its processing as well as the rules of privacy protection and user rights are specified in detail:
 - 1) in this document,
 - 2) in the "X Privacy Policy" document published at: <https://x.com/en/privacy>

- 3) in the “Twitter Controller-to-Controller (Outbound) Data Protection Addendum”, published at: <https://gdpr.twitter.com/en/controller-to-controller-transfers.html>.
16. X is responsible for notifying persons using X products and services about data processing for the purposes of page statistics and for enabling them to exercise their rights in accordance with the GDPR (information on the data used to create page statistics is available at: <https://x.com/en/privacy>).
17. You can contact X’s data protection officer via:
 - 1) a form available at: <https://help.x.com/en/forms/privacy>,
 - 2) correspondence address:
 - a) Twitter International Unlimited Company with its registered office at: One Cumberland Place, Fenian Street Dublin 2, D02 AX07 Ireland (if the user lives in a European Union country, EFTA country or in the United Kingdom),
 - b) X Corp. with its registered office at: 1355 Market Street, Suite 900 San Francisco, CA 94103 (if the user lives in the United States or any other country outside the European Union, non-EFTA country or country other than the United Kingdom).

IV. DATA COLLECTED AUTOMATICALLY

1. Use of the website available at <https://elemental.biz> involves sending queries to the server, which are automatically saved in the event logs.
2. Data regarding user sessions are saved in event logs. This is in particular: IP address, type and name of the device, information about the web browser and operating system, date, and time of visiting the Website.
3. Data recorded in event logs is not associated with specific people.
4. Event logs can be accessed by persons authorized by the Controller to administer the Website.
5. The chronological record of information about events is only auxiliary material, used for administrative purposes. The analysis of event logs allows, in particular, identification of threats, ensuring proper security of the Website and creating statistics to find out how the Website is used by its users.
6. Data regarding user sessions is used by the Controller to diagnose problems related to the operation of the Website and analyze possible security breaches, manage the Website and to keep statistics (legal basis: Article 6(1)(f) of the GDPR – legitimate interest).
7. We use cookies on the Website. More information on this subject can be found in the “Cookie Policy” available at <https://elemental.biz/polityka-cookies>.

V. FINAL PROVISIONS

1. This “Privacy Policy” serves information purposes and applies in particular to the Controller's website available at <https://elemental.biz>.
2. The Website may contain links to other websites, in particular to the websites of entities belonging to the Elemental Capital Group, as well as to the websites of Elemental Holding shareholders, service providers and partners. The Controller recommends that every user, after visiting the websites of other entities, read the privacy policies applicable there.
3. The Controller reserves the right to introduce changes to the applicable “Privacy Policy”, in particular in the case of:
 - 1) technology development,
 - 2) changes to generally applicable provisions of law, including those regarding personal data protection or information security,

- 3) Website development, including the implementation of new services and functionalities.
4. The Controller will notify users about relevant changes in the “Privacy Policy”, in particular by posting an announcement on the Website.
5. This version of the “Privacy Policy” is effective as of December 5, 2024.