

Information on personal data processing for Drumo.com Users

Effective as of 12.06.2023

WHO IS THE DATA CONTROLLER OF MY DATA?

The data controller of Users' personal data is Drumo SA, with its registered office in Warsaw at ul. Koszykowa 61, entered into the National Court Register kept by the District Court for the capital city of Warsaw, 12th Commercial Division of the National Court Register (KRS), under KRS no. 0000698534.

HOW DOES DRUMO PROTECT MY PERSONAL DATA?

We have implemented technical and organisational measures to ensure the security of Users' personal data. These measures include, among other things, access control to personal data, control of the processing of personal data, personal data anonymisation. The access to personal data is only granted to authorised Drumo employees who are obliged to keep the confidentiality of the personal data. Furthermore, Drumo has implemented an appropriate data protection policy.

WILL MY PERSONAL DATA BE VISIBLE TO OTHER DRUMO USERS AND INTERNET USERS?

Users' personal data, such as nicknames or avatar may be visible to other Drumo Users and may be indexed by search engines. All other data, including the data you provide during surveys will not be published and will not be available to other Drumo users. Please note that we will share your survey answers with survey organizers, who will become independent data controllers .

DO I HAVE THE RIGHT TO ACCESS MY DATA?

As far as the data that you provide during the registration process are concerned, each User has the right to request the access to, rectification or erasure of personal data or restriction of processing concerning the data. Furthermore, each User has the right to object to the processing of data. The data can be accessed in the Account. Once you complete the survey, we will transfer your answers to the survey organizer. If you would like to delete, amend or rectify your data provided

during surveys or you would like to execute any other rights you have under GDPR regarding surveys, you should contact the organizer of each survey directly.

WHY DOES DRUMO PROCESS MY DATA?

Drumo processes Users' personal data on the basis of and in connection with the concluded contract for the provision of services electronically. The purpose of the processing of personal data is to provide Users with services, described in detail in the Terms and Conditions, and the performance of the contract for the provision of services electronically.

Personal data need to be provided in order to enter into the contract for the provision of services electronically. Failure to provide personal data will prevent Drumo from performance of services.

Drumo also uses electronic communication tools, such as email, to inform Users about new functionalities of the Website or provide other information that may be of interest to Users. This activity is based on Article 6(1)(f) GDPR. Drumo has assessed the impact of this activity on Users' privacy and, having considered Users' interests, has come to the conclusion that it will not have a negative impact on Users' privacy. The purpose of such use of the personal data brings significant benefits to Users, enabling them to follow news and changes regarding their topics of interest. Each User may opt out of this type of activity by changing settings in their accounts.

We may publish some testimonials of our Users. If you upload your photo, we may use it also for promoting your testimonials.

With Users' consent, Drumo processes personal data to profile Users and for the marketing communication purposes. Consent to these activities is voluntary and does not affect the possibility of entering into the contract for the provision of services electronically.

We also process your personal data in order to verify your identity and to ensure that all your actions within our Services are complete, accurate and honest. This is why,

in some cases, we need to verify your phone number or other personal data. We limit the data we use for verification, however in some cases we may ask you to provide us with additional information.

HOW LONG WILL DRUMO STORE MY PERSONAL DATA?

Drumo will store personal data for the entire term of the contract for the provision of services. After the end of the contract, personal data will be stored until possible claims (including tax claims) become statute-barred.

DOES DRUMO TRANSFER PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EUROPEAN UNION)?

Drumo may transfer personal data outside the European Economic Area (European Union). This will always be done under a legitimate basis, such as data transfer agreements based on standard clauses.

DOES DRUMO TRANSFER PERSONAL DATA TO OTHER ENTITIES (COMPANIES)?

We cooperate with different survey organizers. When completing surveys you share your personal information with Drumo. Drumo then transfers the same information to trusted third parties in order to develop services and products.

Note that in most of the cases the data is provided to third parties directly and voluntarily by you (you are directed to a third-party mobile or browser destination) and Drumo only acts as an intermediary.

Furthermore, the data collected by Drumo may be accessed by external companies providing such services to Drumo as hosting, server maintenance and database maintenance. These entities are recipients of the data, being the so-called processors acting on behalf of and on instructions from Drumo. Drumo ensures that these entities store data within the European Union or, if stored outside the European Union, that the data are adequately secured.

In the case of paid services, the personal data related to payments are transferred to the payment service provider. Drumo does not have the access to the personal data provided to the payment service provider. This applies in particular to credit card data.

Drumo also transfers anonymised cookies and other anonymised data to third parties regarding website Users. These data do not permit to decrypt the activity of a particular User on the Website, but they enable to determine Users' geographic, statistical and demographic data. The purpose of provision of such data is to customise advertisements and other similar messages directed at Users.

DO I HAVE THE RIGHT TO DATA PORTABILITY?

Yes. In accordance with Article 20 GDPR, every person has the right to data portability. The right to data portability means that everyone has the right to receive the personal data provided to Drumo, in a structured format. Everyone may transmit the data to another controller. Everyone may also request that Drumo transmit those data to another controller specified by the data subject, provided it is technically feasible.

WHAT IS PROFILING AND WHAT IS IT PURPOSE?

Profiling is the customisation of the content of the Website and offers to the interests and preferences of a relevant User. Profiling is done automatically; however, it remains under human control.

User profiling at Drumo is aimed at improving the quality of services provided to Users. For profiling purposes, Drumo uses data on Users' activities, interests and preferences on the Website and on other web pages. For profiling purposes, Drumo also uses information and data on User-added content on the Website, posted comments, liked content available on the Website and on other web pages, and other activities of Users on the Website. These data are processed by a special algorithm. Profiling carried out by Drumo, which has legal effects on Users, requires

consent. Withdrawal of the consent to profiling does not affect the lawfulness of data processing under the consent before its withdrawal.

[CAN I WITHDRAW MY CONSENT TO PROFILING?](#)

Consent to profiling is voluntary and can be withdrawn (revoked) at any time. It may be withdrawn in the Account on the Website.

[WHAT IS MARKETING COMMUNICATION?](#)

Marketing communication is the activity carried out via email or other similar tools in order to present Users with Drumo's and other entities' (companies') offers and promotions.

[CAN I WITHDRAW MY CONSENT FOR MARKETING COMMUNICATIONS?](#)

Consent to marketing communication is voluntary and can be withdrawn (revoked) at any time. It can be withdrawn by clicking the "unsubscribe me" link (or a similar link) in the email message received from Drumo. Withdrawal of the consent does not affect the lawfulness of data processing under the consent before its withdrawal.

[DO I HAVE THE RIGHT TO LODGE A COMPLAINT RELATED TO THE PROCESSING OF PERSONAL DATA?](#)

Yes, each User has the right to lodge a complaint with the supervisory authority.