

PRIVACY POLICY

Mission Amygdala

This Privacy Policy is intended to provide information about how we process your personal data. This Privacy Policy will explain what personal data is collected, used, and disclosed by the Controller. We are committed to ensuring that the protection measures we apply are effective and guarantee the confidentiality, integrity and availability of the data processed. By downloading, using, or accessing the services provided by the Administrator, you declare that you have read this Privacy Policy.

Personal data means any data relating to an identified or identifiable natural person whose identity can be determined directly or indirectly from them. Personal data can be information such as names, contact details, identification data (online), online identifiers or other characteristics of an individual.

I. Who is the controller of your personal data?

The controller of personal data of Users of the mobile application and the Mission Amygdala website is:

Calmsie spółka z ograniczoną odpowiedzialnością with its registered office in Lublin at Bartosza Głowackiego 3/5, apartment 1 (Lublin, 20-060), entered into the Register of Entrepreneurs kept by the District Court Lublin-Wschód in Lublin with its registered office in Świdnik, VI Commercial Department of the National Court Register under KRS number 837737, NIP 7123401355, REGON: 385914919, with a share capital of PLN 5,000 (hereinafter: the "Controller").

II. What is the data protection system at Calmsie?

Personal data collected by the Administrator are processed in accordance with the rules set out in the data protection legislation, including 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 (General Data Protection Regulation) (hereinafter: "RODO") and Polish regulations issued in connection with RODO, including the Act of 10 May 2018 on personal data protection.

The most important elements in our data protection system are:

- collecting and processing only necessary personal data,
- granting access to your personal data only to persons authorized and trained in the protection of personal data, providing a guarantee of its security,
- IT system and internal procedures meeting all standards of personal data protection

III. What is the scope and purpose of personal data processing?

We process your personal data in connection with your use of our mobile app or the Mission Amygdala website. If you would like to find out more about how they work, please read the Terms and Conditions available on the website at <https://missionamygdala.com/TermsAndConditions/>

We process your personal data as it is necessary for the conclusion and due performance of the contract and its termination, as well as for taking other actions necessary for the performance of the services under Mission Amygdala. This means that the basis for processing your personal data is Article 6(1)(b) RODO (i.e.: "processing is necessary for the performance of a contract to which the data subject is a party, or to take steps at the request of the data subject prior to entering into a contract") and Article 6(1)(c) of the RODO (i.e.: "the processing is necessary for compliance with a legal obligation incumbent on the controller").

At the same time, we process your personal data for the purposes indicated below, based on the Controller's legitimate interest, i.e. Article 6(1)(f) RODO, which is:

- contacting you, including for permitted marketing purposes, through available communication channels,
- ensuring that we are able to prove the contract between us and its proper performance,
- conducting statistical analyses,
- diagnosing application and service errors and improve their quality,
- storage of data for archival purposes.

In this case, the ground for processing is Article 6(1)(f) of the RODO (i.e.: "processing is necessary for the purposes of legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular when the data subject is a child").

One of the purposes of Mission Amygdala is to psychoeducation, which may involve the processing of special categories of personal data, commonly referred to as sensitive data. This applies in particular to your use of the videobot, to which you may provide health data and other data that may reflect your physical or mental state.

For these categories of data, we need your explicit consent to process them in accordance with Article 9(2)(a) of the RODO, so the legal basis for processing your personal data for the above purposes is Article 9(2)(a) in connection with Article 6(1)(a) of the RODO (ie: "the data subject has consented to the processing of their personal data for one or more specified purposes").

With separate consent, we may also process your personal data for marketing purposes (i.e. to send you other marketing information by email). The legal basis for processing your personal data for these purposes is therefore Article 6(1)(a) of the RODO (i.e.: "the data subject has consented to the processing of their personal data for one or more specified purposes").

You may withdraw your consent to process your personal data at any time by contacting us at contact@calmsie.ai or by deleting the Mission Amygdala application. In this case, we will immediately stop using your personal data processed based on your consent. Please note that withdrawal of consent does not affect the lawfulness of the processing that was carried out on based on consent

before its withdrawal. The controller guarantees that it will only process your personal data for specific, explicit and legitimate purposes and will not further process it in a way incompatible with those purposes.

IV. **Cookies**

We use cookies to analyze traffic, remember your preferences, optimize navigation and improve our services. We may use both persistent and session cookies; persistent cookies remain on your computer after you close your session and until you delete them, while session cookies expire when you close your browser. For example, we store persistent cookies to verify device information and anonymous location data.

The data collected is used to monitor and review how you use the Administrator's application and website in order to improve the operation of Mission Amygdala providing a more efficient and seamless navigation experience. We use Google Analytics tools to monitor User information to record behavior on the website. The information collected by this tool is entirely anonymous and does not identify you. Cookies from Google LLC are used for this purpose. The use of Google Analytics services involves the implementation of a tracking code provided by Google in the code of our website. This code is based on cookies, but may also use other tracking technologies. More information on the use of Google Analytics tools can be found at: <http://www.google.com/analytics/learn/privacy.html>. You can prevent your personal data from being processed this way (block Google Analytics) by making the appropriate choices in the service available here: <https://tools.google.com/dlpage/gaoptout>. The anonymous data of the Users of the website, in relation to the Google Analytics service, contained in the cookies are disclosed to Google LLC and Google Ireland Limited on the terms and conditions set out here: <https://privacy.google.com/businesses/controllerterms/> If you are interested in details related to Google's use of data from websites and applications that use Google's services, we encourage you to read the information provided at: <https://privacy.google.com/businesses/controllerterms/>

You can use your browser settings to control cookies or to prevent acceptance of some or all cookies. For more useful information on how to block cookies with different browsers, visit www.allaboutcookies.org. You may block or delete all or some cookies. However, blocking or deleting cookies may limit your use of the full capabilities of Mission Amygdala.

V. **What categories of personal data do we process and is it necessary to provide such data to enter into a contract with us?**

When you use Mission Amygdala, we collect various types of your personal data, both from your device and from data you provide to us voluntarily. These include:

- a) basic personal data identifying the User, such as: name;
- b) contact information, such as email address;
- c) information about your device, browser and operating system;
- d) usage data (e.g., the date and time you access Mission Amygdala and the date and time you perform certain actions within Mission Amygdala);

- e) the data you provide to us by filling out the surveys you see in the application;
- f) account credentials, i.e., passwords and other security information used for authentication and access purposes;
- g) activity information, i.e., information about your activities in navigating our services and which parts of our services you use most frequently and information regarding your desire to order services;
- h) data about your mood, in particular as part of your use of the mood tracker functionality.

When using a video available in the app, you can provide any information to the videobot, including information that goes beyond that described in (a) - (h) above. In that case, the data obtained by the videobot will also be processed by us to the extent indicated in the following privacy policy.

By submitting information to us, you acknowledge that you have the right to authorize us to process it in accordance with this Privacy Policy.

Providing your data is voluntary but necessary to register an account with Mission Amygdala with respect to the data referred to in (a) - (c). With respect to health and activity and well-being data, the provision of such data is voluntary and based on your explicit consent, but necessary to use certain functionalities of Mission Amygdala, including the customization of recommendations and the use of a dedicated videobot.

Providing the personal data you have selected when contacting us through your chosen communication channel is completely voluntary, but in most cases necessary to respond to your inquiry.

You do not have to share the information contained in cookies with us. You can prevent this by deleting cookies and changing the cookie settings in your browser. Please note, however, that changing the settings of cookies so that the use of the information contained therein is blocked may cause difficulties in using the application or the website and many other websites that use cookie technology.

VI. How do we transfer personal data?

In specific situations in which the applicable law obliges us, as a Controller, to pass on the collected data to state authorities, we will be obliged to make them available.

Except for the above situations, your personal data, to the extent permitted by law, on the basis of separate agreements on the entrustment of personal data processing, will be transferred to specific entities solely and exclusively in connection with the need to fulfill a contractual or legal obligation of the Controller. The categories of entities to which the data may be transferred include, among others: banks, accounting offices, law firms, IT service providers.

In case of transferring your personal data, the Controller enters into appropriate entrustment agreements with the processors, guaranteeing the highest standard of protection and maintaining the

confidentiality and security of personal data, as well as their use only for the purpose of fulfilling the contractual or legal obligation of the Controller.

VII. **Do we transfer data to third countries?**

Some recipients of the data may be located outside the European Economic Area, not providing an adequate level of protection. In any case, such transfer shall only take place using appropriate safeguards related to such data processing, including in particular on the basis of a contract with the data recipient using Standard Contractual Clauses approved by the European Commission.

VIII. **Privacy and security policy of Calmsie's partners**

We take great care in selecting the business partners and platforms we use to create Calmsie. However, we recommend that you review each of our partners for yourself and decide for yourself whether you want to entrust them with your personal data.

IX. **How long do we process your personal data?**

We will process the data you provide in connection with creating an account on the Mission Amygdala app that is necessary for us to provide services to you for the duration of the relationship, i.e. maintaining your account on the Mission Amygdala mobile app or website.

If you have any legal or contractual entitlements, we need to process your personal data for the duration of those entitlements in order to be able to assist you in this regard if necessary.

Personal data provided to us through the means of communication you have chosen will be kept for no longer than is necessary for us to respond to you, after which time it may be kept in case of potential claims for the period of limitation set by the relevant legislation.

The processing of your data based on your consent continues until you withdraw your consent. Withdrawal of consent shall not affect the lawfulness of processing that was performed on the basis of consent before its withdrawal.

X. **What are your rights in relation to your personal data?**

In accordance with applicable laws, you have the following rights with respect to your personal data, where provided by law:

- **The right to refuse or restrict the processing of personal data:** the right to require us to restrict or stop processing your personal data that we hold for a specified or indefinite period of time. In certain cases, it may not be possible for us to comply with your request in this respect, e.g., where the processing is necessary to comply with a legal obligation or where we can demonstrate the existence of another legitimate basis;

- **The right to object to the processing of personal data.** The grounds for objection should relate to your individual situation and the processing based on a condition in the form of a legitimate legal basis. In the aforementioned case, we will cease processing your personal data unless we demonstrate compelling reasons to justify further processing.
- **Right of access to personal data:** the right to obtain information about your personal data that we process;
- **Right of Rectification:** the right to request us to rectify or complete your data if it is inaccurate or incomplete, and the right to erasure: the right to request us to erase your personal data to the extent permitted by law;
- **Right to portability of personal data:** the right to require us to provide you directly with personal data belonging to you. This provision applies to certain personal data where it is processed by automated means and with your consent or based on a contract you have entered into with us;
- **Right to withdraw consent to the processing of personal data:** the right to withdraw consent to the processing of your personal data at any time;
- **The right to lodge a complaint to the supervisory authority** - the President of the Office for Personal Data Protection.

These rights are not transferable and cannot be restricted. We are always happy to help and inform you, and you can exercise some of the rights listed above yourself. If you have any questions about your rights or our data protection principles, please write to us at: contact@calmsie.ai

XI. **Do we process your data by automated means, including profiling?**

Your personal data will be processed by automated means (including profiling), however, this will not have any legal effect on you or similarly significantly affect you.

The profiling of personal data by Mission Amygdala involves the processing of your data in an automated manner, by using it to evaluate certain information about you, in particular to:

- analyzing or forecasting your personal preferences and interests,
- preparing recommendations and individualized advice,
- tailor marketing or advertising materials to your preferences.

XII. **Possibility of changing the Mission Amygdala Privacy Policy**

As the Controller, we inform you that we may change the Privacy Policy if it is required by applicable law, the technological conditions of Mission Amygdala change, or the change introduces a standard higher than the minimum required by law.

In the event of any change, you will be notified by us within the mobile app, on the website or by email.

XIII. **How to contact us?**

The data controller may contact you using the e-mail address you have provided, only in special situations do we use the telephone number you have provided.

If you have any questions or concerns about this privacy policy and the security of your personal information, we encourage you to email the Data Protection Officer I.

If you wish to update or delete your personal data, unless you are unable or unwilling to do so yourself, please contact us by email: contact@calmsie.ai

In the above matters you can also correspond with us at the address: Lublin 20-060, Bartosza Głowackiego street 3/5, apartment 1

This version of the privacy policy is effective as of August 1, 2022.