

TVN MEDIA PRIVACY POLICY

I. GENERAL PROVISIONS

1. In the interest of protecting the Online Service Users' right to privacy and in order to comply with legal requirements, TVN Media shall provide the Online Service Users with this Privacy Policy, which explains and informs them how Users' personal data is processed and secured.
2. TVN Media shall process personal data in accordance with applicable laws, including the GDPR.
3. Before you start using the Online Service, the User should read this Privacy Policy.

II. DEFINITIONS

Capitalised terms in this Policy shall have the following meaning:

- **Counterparty** – a natural person, legal person or organisational unit without legal personality, whose legal capacity is granted under a separate statute, running business activity in its own name, using the Online Service under the agreement concluded with TVN Media.
- **Cookie file** – a cookie is a file downloaded on the User's computer when accessing certain websites; cookies act as virtual door keys - they unlock the computer's memory and allow the website to recognise Users returning to the website by opening doors to different content or services; a cookie, when analysed by a specific browser, can help the website to improve the service provided.
- **Policy** – this Privacy Policy.
- **Rules and Regulations** – the rules and regulations of the Online Service, made available to Users at the time of account registration and during the use of the Online Service.
- **GDPR** – Regulation (EU) No 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..
- **Online Service** – TVN Media Online services provided to the Counterparties and available at the following domain addresses:
 - **TRANSFER:** <https://transfer.tvnmedia.pl/>;
 - **Adauction:** <https://adauction.tvnmedia.pl/>;
 - **Playlist:** <https://playlist.tvnmedia.pl/>;
 - **X-news:** <https://x-news.pl/login>;
 - **Order Portal:** <https://portal.tvnmedia.pl/>.
- **TVN Media** – TVN Media Sp. z o.o. with its registered office in Warsaw at ul. Wiernicza 166, 02-952 Warsaw.
- **User** – a natural person authorised to represent the Counterparty who is an employee or associate of the Counterparty, for whom, with a view to using the Services provided on the Online Service, an Account has been set up, holding appropriate access rights to administer the Account and use the services on the Online Services in line with the access rights granted. For the purposes of the Policy, the User shall also mean a Counterparty who is a natural person or a person pursuing individual business activity.

III. COLLECTING AND PROCESSING OF DATA BY TVN MEDIA

1. The Controller of personal data provided by Users while using the Online Service is TVN Media.
2. Following the use of the Online Service, TVN Media may process in particular the following personal data: name and surname, e-mail address, information on place of employment, identifying information (PESEL/national identity number or identity document number).
3. In order to use the TVN Media Online Service, it is necessary to provide data identifying the Counterparty and data enabling identification of the User representing the Counterparty.

Depending on the requirements set out in the Rules and Regulations of a given Online Service, in order to represent the Counterparty, it may be necessary to provide TVN Media with a power of attorney for representation (a specimen of which may be annexed to the Rules and Regulations) or another document.

4. Provision of data by the User is voluntary, but necessary to use the Online Service.

IV. PURPOSES AND LEGAL BASES FOR DATA PROCESSING

TVN Media shall process Users' personal data for the following purposes:

a. service provision

- TVN Media shall process Users' personal data in order to provide the services available on the Online Service, including informing of any changes or new functionalities.

The legal basis for the processing is Article 6(1)(b) and (f) of the GDPR (acceptance of the Rules and Regulations of the Online Service, a concluded cooperation agreement and the legitimate interest of the controller).

b. ensuring the security and functionality of the Online Service

- TVN Media shall process personal data where this proves necessary to ensure the security of information processing at TVN Media and the management of ICT systems.

The legal basis for the processing is Article 6(1)(f) of the GDPR (fulfilment of TVN Media's legitimate interest, i.e. ensuring the operation of the Online Service and high quality service).

c. service development

- TVN Media shall process personal data in order to measure and improve content and services.

The legal basis for the processing is Article 6(1)(f) of the GDPR (fulfilment of TVN Media's legitimate interest, i.e. improving its services and ensuring their best quality).

d. marketing activities

- TVN Media shall process personal data in order to tailor advertising content to the Counterparty's business operation profile.

The legal basis for the processing is Article 6(1)(f) of the GDPR (fulfilment of TVN Media's legitimate interest, i.e. tailoring marketing information to the User).

e. handling Users' queries and complaints

- TVN Media shall process personal data in order to handle complaints and claims of Counterparties related to the operation of the Online Service, and to contact the User and take appropriate explanatory or corrective action.

The legal basis for the processing is, depending on the nature of the query, Article 6(1)(b) of the GDPR (e.g. when dealing with complaints in connection with a concluded service agreement), and Article 6(1)(f) of the GDPR (fulfilment of TVN Media's legitimate interest, i.e. ensuring the operation of the Online Service and high quality service).

f. fulfilment of TVN Media's legal obligations

- TVN Media shall process the data if this proves necessary for the fulfilment of legal obligations.

The legal basis for the processing is Article 6(1)(c) of the GDPR (fulfilment of TVN Media's legal obligations).

g. exercising or defending against possible claims

- In the event of any possible claims against Counterparties or the need to protect against claims, TVN Media may process User data obtained through the Online Service.

The legal basis for the processing is Article 6(1)(f) of the GDPR (fulfilment of TVN Media's legitimate interest, i.e. defending against claims or exercising claims).

V. DATA SOURCE

Personal data may be provided directly by the User or by the Counterparty.

VI. DATA SHARING

1. TVN Media may share Users' personal data at the request of public authorities or other entities entitled to such access by virtue of the law, in particular when this proves necessary to ensure the security of the Controller's systems or the rights of other Counterparties or Users, and at the request of Counterparties or Users, or when this proves necessary to provide the services offered by TVN Media.
2. User's data may be accessed by entities whose services are used by TVN Media in order to provide the services to the Counterparties (e.g. entities providing Online Service hosting services, auditors, advisers). In such cases, TVN Media shall conclude appropriate agreements with these entities to protect the Users' data against unauthorised access.
3. TVN Media belongs to the TVN Discovery capital group and data of Counterparties and Users may be transferred to other companies of the group for administrative purposes or mutual provision of services.
4. Some service providers may store User's data outside the territory of the European Economic Area. In such cases, Users' data may be stored in countries that provide an adequate level of protection for personal data, or in countries that do not provide such a level of protection. In the latter case, TVN Media shall safeguard Users' data by entering into agreements with TVN Media service providers containing so-called Standard Contractual Clauses approved by the European Commission, which provide a guarantee of adequate protection of Users' data in third countries, or by using other bases for the transfer of personal data.
5. TVN Media may disclose anonymous summary sheets and statistics relating to, for instance, the number of visitors to a given Online Service. However, this data shall not enable identification of individual Users and shall not constitute personal data.

VII. USER'S RIGHTS

The User shall exercise the following rights in relation to their personal data processed by TVN Media as part of the Websites:

a. right to access personal data

At the User's request, TVN Media shall confirm which personal data of the User it processes and provide the User with a copy of such data. The User has access to the personal data that they have provided to TVN Media through their Online Service account.

b. right to rectify personal data

Should the User's personal data be inaccurate or incomplete, the User may request TVN Media to rectify or complete them. Registered User may correct their personal data through their Online Service account.

c. right to erase personal data

In certain situations, the User may request TVN Media to erase personal data processed by TVN Media (e.g. when the data is no longer necessary for the provision of the services by TVN Media to the Counterparty).

d. right to restrict the processing of personal data

The User may request TVN Media to temporarily suspend the processing of their data in certain situations. For example, the User may request the restriction of the processing of their personal data, when they object to the processing or when they question the accuracy of the data. Despite the restriction of processing, TVN Media shall still have the right to store personal data.

e. right to request the portability of personal data

In certain situations, the User shall have the right to receive the personal data processed by TVN Media in a structured, commonly used machine-readable format in order to transmit such data to another controller.

f. right to object to the processing of personal data

The User may object to the processing of their personal data on the basis of a legitimate interest or for statistical purposes (due to their particular situation) or to the processing for direct marketing purposes.

In order to exercise your rights, please contact TVN Media electronically at the following address: iod@tvn.pl.

Should the User find that the provisions concerning the protection of personal data have been breached, they have the right to lodge a complaint with the President of the Personal Data Protection Office.

VIII. DATA STORAGE PERIOD

Where the User is a Counterparty, TVN Media shall store the User's personal data for the duration of the provision of the Services and where the User represents the Counterparty - for the duration of the User's representation of the Counterparty. Upon termination of the contract with the Counterparty or expiration of the authorisation, the User account shall be deactivated. Personal data related to a given account may be stored longer if such an obligation arises from the law or it is necessary for TVN Media to defend or exercise claims against the Counterparties.

IX. COOKIE FILES

1. The Online Service uses Cookies which include:

- the name of the server from which the Cookie was sent;
- the Cookie's lifetime;
- Cookie's value (usually a randomly generated unique number).

2. The Online Service that sent the Cookie uses this number to identify the User when they return to the Online Service or browse from page to page. Only the Online Service that sent the Cookie can read and therefore use a given Cookie.

3. TVN Media shall use Cookies for the following purposes:

- providing assistance to Users for efficient navigation through the Online Service;
- performing various functions, including analysing Online Service traffic;
- identifying the User the next time they log on and offering content tailored to the User's preferences and interests.

4. Some Cookies may collect personal information, including information disclosed by the User, such as user name, or where Cookies track the User in order to deliver more relevant advertising content.

5. On the Online Service, Cookies are installed by:

a. TVN Media

TVN Media may install Cookies on the User's device for various purposes: to facilitate navigation on the Online Service, to administer and provide access to the Online Service and to provide better and more personalised content on the Online Service.

The cookies we install enable us, for example to:

- adapting the display format of our content and the Online Service to the device used by the User,
- recognise the User's device in order to remember the preferences and settings of the Online Service User.

g. Third parties

Third parties may install Cookies on the User's device.

TVN Media shall not control the installing and use of Cookies by third parties and shall not be responsible for the use of Cookies by third parties. These entities have their own privacy policies and data collection practices. To better understand the control options available to the User, the User should refer to each company's individual privacy policy.

The purpose of the third parties' Cookies that we are aware of is to provide audience measurement and social sharing functions and to tailor content or advertising.

- Measurement: audience, traffic, technique

Audience measurement cookies are used by third parties to obtain information about your browsing patterns, in order to, inter alia: (i) understand how to reach the site and rebuild one's path; (ii) count the number of visitors to the Online Service, in particular to improve the content we offer; (iii) compile traffic and/or conversion statistics; (iv) follow up on invoicing by TVN Media partners (advertisers and search engine marketing and affiliate marketing companies) on the Online Service; (v) access the User's account.

These tools use technology to track website visitors and associate a "referral page" or campaign with a unique identifier.

- Advertising spaces

Cookies may be installed on the User's device via the advertising space on the Online Service.

These Cookies may be set at the level of the advertising content displayed in TVN Media's advertising spaces by the advertisers themselves or by their advertising service providers (third-party advertising servers), such as consulting agencies, audience measurement companies and targeted advertising providers. Cookies are linked to advertising content.

The main purposes for which advertisers and third-party advertising servers use Cookies include: (i) counting the number of views of advertising content in TVN Media's advertising spaces, identifying the advertisements viewed and calculating the amounts payable to the various advertising stakeholders (communications agency, advertising sales house, publishing medium, etc.); (ii) compiling statistics; (iii) collecting navigation data on devices browsing the Online Service and, for example, limiting the number of times advertisements are displayed and/or allowing advertisements to be displayed in the exact order; (iii) recognising the User's device if and when you subsequently browse a third-party website or service where those third-party advertising servers also deliver Cookies, and, where applicable, tailoring those third-party websites and services or the advertisements they display to any navigational data from the User's device that may be known to them; (iv) determining whether an advertising campaign has produced the desired results by tracking the number of people who click on advertising content or visit an advertiser's website after viewing an advertisement on the Online Service.

h. TVN Media advertising space management company

On some websites, cookies may also be embedded in our advertising spaces by the company responsible for managing our advertising spaces: the advertising sales house. Detailed information on such cookies can be found in the "Cookie Settings" in the footer of the website referred to below. Such Cookies would enable the management company to:

- calculate the necessary amounts to be settled to be paid to the various advertising operators concerned and to compile statistics;
- adapt the advertising spaces it manages to the display preferences on the device;
- tailor the advertising content displayed on the User's device through our advertising spaces to their browsing patterns and geographic location;
- tailor the advertising content displayed on the User's device through our advertising spaces to their browsing patterns on third party websites.

X. TYPES AND LIFETIME OF COOKIES

1. The Online Service uses several types of Cookies, including:

a. Session Cookies

Session Cookies are created temporarily in the browser subfolder when visiting a website and are automatically deleted when you leave the website.

i. Persistent Cookies

Unlike session Cookies, persistent Cookies are reactivated upon returning to the same

website and are kept in the browser subfolder until they expire (usually after 12 months).

j. Secure Cookies

Secure Cookies are a type of Cookie that is sent over an encrypted HTTP connection. When setting a Cookie, the Secure attribute instructs the browser that the Cookie should only be returned to the application over encrypted connections.

k. Third-party Cookies

A Third Party Cookie is a Cookie that is installed on a hard drive by a website from a domain other than the one that the User is visiting (e.g. when the website contains content, such as advertisements, from a third party domain). Third-party cookies are set so that the site can remember some details about the User at a later time. These Cookies are set by third parties and we do not control how they are set.

l. SameSite Cookies

SameSite Cookies enable servers to assert that a cookie should not be sent along with requests between sites, which provides some protection against Cross-Site Request Forgery (CSRF). *SameSite* Cookies may not be supported by all browsers.

2. The User can determine how Cookies are set on their device by adjusting their browser settings in accordance with Section XI below.
3. Should the User experience any problems with settings used for disabling Cookies, they may ask the Customer Service Centre for help by sending an enquiry to the e-mail address: pomoc@tvn.pl or iod@tvn.pl.

XI. OPTING IN OR OUT TO INSTALLING COOKIES

1. TVN Media participates in the IAB Europe Transparency & Consent Framework and complies with its rules and specifications. For selected Online Services where cookies are embedded, TVN Media uses a consent management platform with the identification number 28. Where a given Online service installs cookies on Users' browsers, upon first accessing the service and after deleting the cookies in the browser, Users will see the aforementioned consent management platform - see below for details of the platform.
2. The User may express consent or objection to the processing of Cookies by:

a. the use of "Cookie Settings"

The User may enable and disable Cookies or manage how TVN Media and third party participants in the IAB Europe Transparency & Consent Framework may collect or use the User's data through TVN Media's Cookie Preference Centre accessible via the "Cookie Settings" button in the footer of the Online Service page. Please note that once all Cookies are disabled, some functionalities of the Online Service may not be available to the User or may adversely affect the performance, efficiency or customisation of the Services. Should the User experience any technical problems or any obstacles that prevent them from managing "Cookie Settings", they may ask the Customer Service Centre for help by sending an enquiry to the e-mail address: pomoc@tvn.pl or iod@tvn.pl.

m. Browser settings

The User may also authorise, refuse or disable Cookies by changing their browser settings. If the User disables a Cookie already installed in the browser, this Cookie shall no longer be active but shall not disappear from the browser until the end of its lifetime. Please note that once all Cookies are disabled, part of the Online Service may become unavailable to the User or may adversely affect the efficiency, effectiveness or customisation of the Online Service.

Each browser has a different configuration. It is recommended to follow the instructions provided by the browser's developer. As of the date this Policy was amended, these instructions have been available for commonly used browsers via the following links:

- If you use Microsoft Edge:
<https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>
- If you use Internet Explorer:
<http://windows.microsoft.com/en-GB/windows-vista/Block-or-allow-cookies>
- If you use Safari:
https://support.apple.com/kb/ph21447?locale=en_US
- If you use Firefox:
<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- If you use Chrome:
<https://support.google.com/chrome/answer/95647?hl=en&hlrm=en>

If you use different devices, make sure that the settings of the relevant browser match your preferences.

3. Unless the User refuses or disables Cookies by using the above-mentioned options, the User thereby expressly consents to the collection, use and sharing of personal data by TVN Media and the third parties mentioned above, subject to their privacy policies. Notwithstanding the foregoing, the User expressly consents to the use of Cookies and to the collection, use and sharing of their personal data by us and Google (e.g. in connection with Google services such as Google Ad Manager).

XII. ADDITIONAL INFORMATION ON COOKIES

For further information about Cookies and tools to manage Cookies, please visit the following pages:

- <http://www.allaboutcookies.org/manage-cookies/>
- <https://www.ghostery.com/>
- <http://www.iab.net/privacymatters/4.php>
- <http://www.youronlinechoices.com/uk/your-ad-choices/>
- <http://www.aboutads.info/choices/>

XIII. LINKS TO OTHER PAGES

This Policy shall only apply to the Online Service administered by TVN Media. TVN Media shall not be liable for any links placed on the Online Service that enable the Users to go directly to pages that are not administered by TVN Media. We encourage you to read the content of the privacy policies on the linked pages.

XIV. TECHNICAL AND ORGANISATIONAL MEASURES TAKEN TO SECURE THE DATA

The information that is provided by our Users shall be processed and stored using adequate safety measures that meet the requirements provided for by the Polish law. TVN Media shall protect the Users' data against any unauthorised access, use or disclosure thereof. Data shall be processed in a controlled environment that ensures high data protection standards. At the same time, we stress the importance of not disclosing registration data to third parties and using the "log out" option each time the Users finish using the content and services offered by TVN Online Service.

XV. CHANGES IN THE PRIVACY POLICY

TVN Media posts the most current version of its Privacy Policy at the footer of the Online Service.

XVI. CONTACT DATA AND THE RIGHT TO LODGE A COMPLAINT

Any enquiries, requests and comments regarding the Privacy Policy and the processing of User's data by TVN Media should be sent by e-mail to the following address: iod@tvn.pl, or by letter to the address: TVN S.A., ul. Wiernicza 166, 02-952 Warsaw.
