

Privacy Policy

Your privacy is our priority.

Data Controller.

This document ("**Privacy Policy**") describes how GIMME P.S.A. with its registered office in Warsaw (02-672) at 37/30.1 Domaniewska Street, entered into the register of entrepreneurs kept by the District Court, Commercial Division of the National Court Register, under the KRS number 0001230820, (hereinafter referred to as "**We/Controller**") processes your personal data in connection with the use of our website www.gimmeapp.golf or our mobile application (collectively referred to as the "**Platform**").

When you visit our Platform or use our services, we may collect and process certain information about you ("**Data**"). Your Data is processed in accordance with applicable law and with the highest standards of privacy and security. First and foremost, we apply 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) ("**GDPR**"). We also use secure technical and organizational measures to protect all Data processed by us from loss, destruction or unauthorized access by third parties.

Data we collect automatically

Our Platform collects certain Data automatically when you use it. We may obtain information through automated means, such as browser cookies, pixels, web server logs, web beacons and other technologies. These technologies, among other things, help us (1) remember your information so you don't have to re-enter it, (2) track and understand how you use and interact with the Platform, (3) tailor the Platform to your preferences, (4) manage and measure the usability of the Platform, (5) understand the effectiveness of our communications, and (6) otherwise improve our services.

The information we collect by automated means includes:

- Data about your device, including MAC address, IP address, log information, device model, hardware model, IMEI number, serial number, subscription information, device settings, connections to other devices, mobile network operator, browser characteristics, application usage information, sales code, access code, current software version, MNC, subscription information, and random, non-persistent and re-settable device identifiers, such as your Personalized Service Identifier (or PSID), and advertising identifiers, including your Google Ads ID;
- Data about your use of the Platform, including Clickstream Data; your interactions with the Platform (such as websites visited, search terms used, and applications and features used); the pages that led or directed you to the Platform; the dates and times you use the Platform; and your use of third-party websites, applications, and features that are linked to our Services;
- Data about Your use of third-party websites, applications and features that are linked to Our Services.

Purposes, legal bases and period of Data processing

We may process your Data for the following purposes:

- perform a contract with us or act at your request prior to entering into it. The legal basis for such processing is Article 6(1)(b) of the GDPR (performance of a contract). The data is processed for the period necessary for the performance, termination or expiration of the contract concluded with you.
- answer your question, enable communication with you through the channel indicated by you. The legal basis for such processing of Data is Article 6(1)(f) of the GDPR (legitimate interest of the controller). This legitimate interest is to enable us to contact you and to fulfill your request. We process the data until an effective objection to this processing is successfully lodged, in any case no longer than for 2 years.
- handling complaints. The legal basis for data processing is Article 6(1)(f) of the GDPR (legitimate interest of the controller). This legitimate interest is to enable us to properly handle your complaints. We process your Data for the period necessary to process your application.
- to conduct marketing and advertising activities for our products or services. Marketing activities include sending the Newsletter (if you have consented to receive commercial information via email by entering your address in the newsletter field). The legal basis for such data processing is Article 398(1) of the PKE Act in conjunction with Article 6(1)(f) of the GDPR (legitimate interest of the controller) This legitimate interest is the provision of commercial information by us about our projects and services. We process your Data until you effectively object to their processing.
- compliance with obligations arising from the provisions of law. An example of such processing would be processing for your orders or settlements related to those orders to comply with tax and accounting obligations. The legal basis for data processing is Article 6(1)(c) of the GDPR (compliance with a legal obligation). We process such Data until the time specified by specific regulations, which is usually a period of 5 years counted from the last day of the year in which the event occurred.
- to pursue or defend our claims or interests. The legal basis for such processing is Article 6(1)(f) of the GDPR (legitimate interest of the controller). This legitimate interest is to keep records related to your interactions with us in connection with our services or the fulfilment of your requests, as well as to protect our reputation or our rights. The period of processing of such Data is 5 years counted from the end of the year in which the event occurred.
- personalization of content and analysis of the functioning of the Platform and web traffic. We use cookies for this purpose. The legal basis for the processing is Article 6(1)(f) of the GDPR (legitimate interest of the controller). This legitimate interest lies in analysing your activity in order to optimize the services provided. We process this Data until you effectively object to its processing, but no longer than is necessary for the purposes of such processing.

Voluntary provision of Data

Providing Data is voluntary. However, without receiving the necessary Data, we may not be able to perform some of the activities commissioned by you - their provision is therefore a condition for concluding a contract with Us and providing our services.

Data recipients

In some situations, we may need to share your Data with third parties, such as:

- **Third-party service providers** - We hire other companies and individuals to perform tasks on our behalf. Examples include fulfilling orders for products or services, providing marketing support, providing legal and accounting services. These third-party service providers have access to the Data to the extent necessary to perform their functions, but may not use it for

other purposes. In addition, they must process the Data in accordance with the provisions of the personal data processing agreements and the applicable data protection laws.

- **Electronic payment operators** - your Data is also processed by electronic payment operators to enable you to perform online transactions.
- **Public authorities** - in connection with the proceedings conducted by them based on the relevant provisions of law.
- **Entities cooperating with us** – if you want to use the services of entities cooperating with us, which are ordered through our Platform, then we will transfer your necessary Data to the entity providing the service.

Transfer of data to countries outside the EEA

We transfer some of the Data from the European Economic Area to countries outside the European Economic Area. Due to the use of the Firebase service provided by Google, some Data may be transferred outside the EEA. When transferring Data to the USA, Google uses EU-U.S. Data Privacy Framework. For more information, see the Privacy Policy of Google.

If, in connection with the provision of our services, it is necessary to transfer the Data to service providers or other third parties outside the European Economic Area, we will only transfer such data to: (a) entities located in countries where the EU Commission has found an adequate level of protection within the meaning of Article 45(3) of the GDPR; (b) in the absence of such a decision, the legal basis for the transfer of the Data is a contract based on standard contractual clauses constituting a set of principles adopted by the European Commission, which, in accordance with Article 46 of the GDPR, ensure the security of the transfer of the Data; (c) on the basis of your consent (Article 49(1)(a) of the GDPR). You will then be informed by us of such data transfer.

Your rights

In connection with the processing of your Data by us, you have several rights, such as:

- the right to request access to your Data, the right to rectification or erasure of your Data ("right to be forgotten");
- the right to object to the processing of Data for the purpose of sending marketing information, because of which we will stop processing your Data for this purpose;
- the right to object on grounds relating to your situation, if we process your Data based on a legitimate interest. However, we will continue to process this Data to the extent necessary, if there is a legitimate reason;
- the right to transfer or restrict the processing of Data processed in connection with the performance of a contract or processed based on your consent;
- if the basis for the processing of the Data is your consent, you have the right to withdraw this consent at any time. However, the withdrawal of consent does not affect the lawfulness of the processing of your Data by us, which we carried out based on consent before its withdrawal.

If you believe that our processing of your Data violates the law, you can lodge a complaint with the President of the Office for Personal Data Protection.

Automated decision-making and profiling

Your Data is not subject to automated processing, and in particular profiling.

Contact Us

You can always contact us by writing an e-mail to: feedback@gimmeapp.golf. We will help you with any questions or comments regarding the protection of your data or if you would like to exercise your

rights under the GDPR. When contacting us, remember to provide us with your contact details and your preferred form of contact. This will help us respond to your questions and requests more efficiently.

Current version of the Privacy Policy

The Privacy Policy is up-to-date information on the processing of your Data by us as of 15.03.2026. Its content may change if we change the way we process it.