

COOKIE POLICY

TS-TUTORING.COM

What is the Cookie Policy?

This Cookie Policy, which is an extension of the Website's Privacy Policy, deals with specific issues regarding our use of cookies, pixel codes and the implementation of other Internet technologies and the processing of personal data through them.

You will find information about this in this Policy:

- What cookies are and what types of cookies exist,
- what internet technologies are used on our Website,
- what data we process,
- how and for what purposes we use the data,
- to whom and how we send data,
- for how long we store the information contained in the cookies.

The Cookies Policy of the Website does not constitute a source of obligation for the Visitor, the Customer of the Website. It is for information purposes only and is not a contract or a regulation. In all matters not regulated by the Cookies Policy, the Privacy Policy or the Terms and Conditions of the Website shall apply.

Contact details.

Think Smart sp. z o.o. with its registered office in Warsaw (Poland) at ulica Białej Floty 6a /83 (Białej Floty street), 02-654 Warsaw, Poland, KRS number: 0000959007, NIP number: 5213959545, REGON number: 52147541200000.

1. Does our Website use cookies?

Yes, our Website, like most websites, uses cookies, i.e., cookies. The Cookie Policy applies to both Customers of the Website and Visitors to the Website, i.e. users who browse the content of the Website but do not make purchases. The policy also applies to a Visitor, i.e. a Visitor who is not a registered Customer and who makes purchases on our Website, but without registering an account.

The Website also uses functionalities similar to cookies. Accordingly, the following provisions of the Cookie Policy should also apply to these technologies accordingly.

2. What are cookies?

Cookies are IT data, in particular small text information stored on the users' terminal equipment, e.g. on a computer, tablet or mobile phone, which can be read by our ICT system (our own cookies) or a third party's ICT system (third party cookies). These cookies allow us to recognise the user's device and display the website accordingly, tailored to the user's individual preferences, allow the website to be displayed in the user's language "remembered" by these cookies, and use other Website settings selected by the user. "Cookies" usually contain the name of the website from which they originate, the length of time they are stored on the terminal device and a unique number.

A pixel is software code that allows you to track Website Visitors and their behaviour on

pixel deployed websites. This can be basic tracking of whether a person has visited a Website, up to detailed tracking of actions such as adding a product to a basket, selecting a product, submitting a form, etc. The pixel can send the collected information to a third party, i.e. the code provider.

3. For what purpose do we use cookies?

We use the cookies and other web technologies we use to:

- a. to ensure the operation, security and reliability of our Website;
- b. to adapt the content of the Website to the Client's or Visitor's preferences and optimise the use of the Website. These cookies make it possible to store your choices regarding language, browser, settings of selected elements of the Website or to opt-out of profiled advertisements, as well as to store information about your location;
- c. to ensure that logging into the Customer's Account is facilitated;
- d. to analyse and compile statistics that help us understand how visitors to the Website use its functionality, so that we can improve its structure and content;
- e. for advertising purposes (including remarketing, retargeting) and linking to social media, the display of behavioural advertising using the Google Ads tool to provide Visitors and Customers with advertising content tailored to their interests or profiles, may also be used to display advertising outside the pages of the Website (also using so-called third party cookies), i.e. with our advertising partners. Our aim is to develop an advertising offer that is attractive and beneficial to our audience, which is why, within the framework of behavioural advertising, Customers and Visitors may see primarily information about products or services that they have already viewed or checked out on our Site.

4. Is personal data processed as part of cookies?

Yes, selected cookies may process your personal data in certain situations. The processing of personal data derived from cookies or similar technologies on our Website is carried out for the purposes of ensuring the functioning of the Website, the adaptation of the Website to the Visitor's and Customer's preferences, or analytical purposes. The processing is carried out on the basis of our legitimate interest. We would like to point out that the legal basis for the processing of personal data for advertising, statistical purposes will always be your additional and explicit consent, expressed by making a selection and ticking the checkbox during the cookie consent process.

When a Visitor or Customer uses the Website, cookies are used to identify their browser or device - cookies collect various types of information which, in principle, do not constitute personal data. However, some information, depending on its content and use, may be linked to a specific person - the attribution of certain behaviour to a specific Visitor or Customer, e.g. by linking it to the data provided when registering an Account on the Website or a specific email address - and thus be considered personal data.

5. If cookies process personal data, does the Privacy Policy then apply?

Yes, the provisions of the Website's Privacy Policy relating to personal data, in particular those relating to the rights of the data subject, apply to information collected by cookies that can be linked to a specific person.

6. Do I have to agree to the use of cookies?

When you visit our Website for the first time, you will be shown information about our use

of cookies. You may choose to accept them or not. If you do not agree to our use of cookies, then we will only use the necessary technical cookies required for the proper functioning of the Website. Non-technical cookies will only be loaded once you have given your consent to the use of cookies (*opt-in* clause).

7. Can I change my mind about using cookies?

Of course you do. If you have consented to our use of cookies, you can change your mind at any time and not consent to them being used in the future. The withdrawal of consent does not affect the lawfulness of the processing that was carried out on the basis of consent prior to its withdrawal. However, please be aware that disabling or restricting the use of cookies may cause difficulties in using the Website, as well as many other websites that use cookies.

8. How can I further manage my privacy?

If you want to further manage your privacy, we include a list of tools that may be helpful:

- a. the cookie settings within your internet browser;
 - Google Chrome: Settings -> Show advanced settings -> Privacy -> Content settings -> Cookies.
 - Internet Explorer cookies can be modified from: Tools -> Internet Options -> Privacy;
 - Mozilla Firefox: Tools -> Options -> Privacy.
- b. browser plug-ins supporting cookie management, e.g. ghostery,
- c. additional cookie management software,
- d. incognito mode in the web browser,
- e. behavioural advertising settings, e.g. youronlinechoices.com,
- f. a mechanism for managing cookies from our website,
- g. Google Analytics Opt-out: <https://tools.google.com/dlpage/gaoptout>,
- h. Google Ads Settings: <https://adssettings.google.com/>
- i. Facebook Ads Settings: <https://www.facebook.com/ads/settings>,

9. Are cookies harmful?

The cookies we use are not harmful to the Visitor and the Customer, nor to the computer, mobile phone or terminal device used by them, so we recommend that you do not disable them in your browsers.

So-called harmless cookies are necessary for the proper functioning of the Website, needed to enable the functionality of the Website, but their function has nothing to do with tracking the user.

We also use so-called "research cookies" on our Site, which we use to track Visitors to the Site, but do not include information that allows (without having other data) to identify a specific user. We use profiling in certain situations, as discussed more in sec. 12.

10. What kind of proprietary cookies do we use?

We use first party cookies to ensure the proper functioning of the Website. Our cookies are intended to make it easier for you to use our Website and in particular the functionality of the Website.

11. Do we use third-party cookies?

Yes. Our website also uses third-party cookies in order to optimise its functioning. We also use third-party cookies for analytical and statistical purposes. Cookies also allow us to tailor advertising and marketing content to your preferences. Cookies also serve to improve the usability and personalisation of the content of the Website.

12. Do we use profiling?

Yes. Thanks to the cookies used on the Website, it is possible for the Data Controller to learn about the Visitor's preferences - e.g. by analysing how often they visit the Website and whether and what products they buy. Profiling applies in particular to logged-in persons, i.e. Customers. Analysing your online behaviour helps us to better understand your habits and expectations and to adapt to your needs and interests.

Based on cookies, the Data Controller also uses technology to reach Visitors who have previously visited the Website with an advertising message when they use other websites, using the Google Ads tool.

13. What specific cookies, pixels and IT tools do we use?

Google Analytics. We use Google Analytics, a tool provided by Google Ireland Limited (registered number: 368047) with registered office at: Gordon House, Barrow Street, Dublin 4, Ireland. This enables us to produce statistics and analysis to improve the performance of the Website.

Google Analytics automatically collects information about the use of our Website. Importantly, we have IP anonymisation enabled. Therefore, Google does not receive personal data from us that could be based on the IP number in combination with other data about Visitors or Customers.

As part of Google Analytics, we collect demographic and interest data. The collected information, which is not personal data, is mostly transmitted to a Google server in the USA and stored there.

If you are interested in the details related to the processing of data within Google Analytics, we encourage you to read the document produced by Google: <https://support.google.com/analytics/answer/6004245>.

Google Ads (formerly Google Adwords)- conversion and remarketing. We use the Google Ads tool, provided by Google Ireland Limited (registered number: 368047) with registered office at: Gordon House, Barrow Street, Dublin 4, Ireland. This enables us to attract attention to our content and offers through advertising material on external websites. We analyse data from advertising campaigns in order to optimise advertising activities. The advertising material is provided by Google via so-called "Ad Servers". For this purpose, we use server cookies by means of which specific parameters can be measured for the success of the reach, such as ad placement or user clicks. If you access our website via a Google ad, Google Ads will store a cookie on your device. For these cookies, a unique cookie identifier, the number of impressions per ad placement (frequency), the last display (relevant for post-display conversions) and opt-out information (indication which user does not wish to be included further) are usually stored to analyse the value. Cookies allow Google to recognise your browser. We do not collect or process any personal data on the basis of the above advertising measures. We do not obtain other data and cannot identify users on the basis of the information obtained. Due to the marketing tools used, your browser automatically starts a connection to the Google server. Even if you are not registered with any Google service or are not logged in, it is possible that network providers may obtain and store your IP address.

We also use a remarketing tool in Google Ads, which enables us to present users of our website with advertisements based on their interests from other websites belonging to Google's advertising network. For this purpose, Google stores cookies in the browsers of users who visit certain Google services or websites on the Google Display Network in order to uniquely identify the browser on a particular device.

We encourage you to read the documents on GDPR and Google Ads: https://ads.google.com/intl/pl_pl/home/faq/gdpr/.

Facebook - We also use marketing tools and Chat provided by Meta Platforms Ireland., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook"). As part of these tools, we target advertising to you on Facebook. We carry out activities in this regard based on our legitimate interest in marketing our own products.

In order to target you with advertisements personalised to your behaviour on our Site, we use the Facebook Pixel, which automatically collects information about your use of our Site in terms of the pages you view.

We do not pass on personal data. The information collected within the Facebook Pixel is anonymous, i.e. it does not allow us to identify you. They only allow us to obtain information about what actions you have taken on our Page. Please note, however, that Facebook may combine this information with other information about you collected through your use of Facebook and use it for its own purposes, including marketing. Currently, the Facebook Pixel also interacts with Instagram data. Such activities of Facebook are no longer dependent on us, and you can look for information about them directly in Facebook's privacy policy: <https://www.facebook.com/privacy>. You can also manage your privacy settings from your Facebook account.

Stripe - Our Website uses solutions provided by Stripe Payments Europe, Ltd. 1 Grand Canal Street Lower, Grand Canal Dock, Dublin, D02 H210, Ireland. The functionality provided by this Partner enables us to seamlessly handle payments made by Customers on our Website.

You can read our partner's privacy policy at the following links:

<https://stripe.com/en-pl/privacy>

Hubspots - as part of our Website we also use solutions provided by HubSpot Ireland Limited 1 Sir John Rogerson's Quay, Dublin 2 Company Number:515723. With the help of our partner we generate contact forms for our website. These make contacting us even easier.

For more information on how our partner processes payments, please follow this link:

<https://legal.hubspot.com/privacy-policy>

14. How long do we keep cookies containing personal data?

Depending on the type, purpose and legal basis for processing cookies, the storage time for cookies is from 1 session to 2 years .

Cookies collected by us containing Personal Data of a Visitor who is not a Customer will be stored until an objection is made. The Data Controller may delete the Personal Data if it is not used for marketing purposes for 2 years unless the law obliges the Data Controller to process the Personal Data longer.

Part of the personal data may be stored for longer in case the Visitor has any claims against the Data Controller or for the Data Controller's investigation of claims or defence against claims (including those of third parties), for the period of limitation prescribed by law, in particular the Civil Code.

In any case, the longer term of retention of Personal Data is decisive.

Cookie Policy 1.0 effective as of 22.02.2024 r.