

Privacy Policy

This Privacy Policy describes the principles governing the processing of personal data by 2BITS Sp. z o.o. in connection with offering the MyLearningDay platform and providing related services.

1. Data Controller and Contact Details

The controller of personal data, to the extent that it independently determines the purposes and means of processing, is:

2BITS Spółka z ograniczoną odpowiedzialnością

Registered office: Katowice

Address: ul. Ligocka 103, 40-568 Katowice, Poland

National Court Register (KRS) number: 0000293324

Tax Identification Number (NIP): 634-26-60-412

National Business Registry Number (REGON): 240792140

For matters relating to personal data protection, please contact us at privacy@2bits.pl.

2. Scope of this Policy

This Policy applies to personal data processed by 2BITS as a controller in connection with:

- the use of the MyLearningDay website;
- contact forms, requests for proposals and product demonstrations;
- demo accounts and test environments;
- the conclusion and performance of agreements with Customers and business partners;
- Customer service and technical support;
- webinars, events and marketing communications;
- the use of the Platform to the extent that 2BITS independently determines the purposes and means of processing.

Where a Customer uses MyLearningDay to organise or deliver training, the Customer generally remains the controller of Users' personal data and 2BITS acts as a processor. The terms of such processing are set out in a separate Data Processing Agreement (DPA).

This Policy does not apply to independent websites and services operated by third parties.

3. Categories of Personal Data Processed

The scope of personal data processed depends on the relationship with 2BITS and the manner in which the services are used. It may include:

- **identification and professional data**, in particular first name, surname, job title, organisation and user ID;
- **contact details**, including email address, telephone number and correspondence address;
- **account data**, including username, account status, roles and permissions;
- **contractual and billing data**, including data required for contract performance, payments and invoicing;
- **technical and security data**, including IP address, device and browser information, session identifiers, system logs and diagnostic data;

- **support-related data**, including the content of support requests, correspondence and attachments;
- **marketing data**, including communication preferences, source of enquiry and information about participation in events.

MyLearningDay is not intended for the processing of special categories of personal data. Such data should not be provided to 2BITS or entered into the Platform unless this is necessary, lawful and subject to appropriate safeguards and arrangements.

4. Sources of Personal Data

Personal data may be obtained:

- directly from the data subject;
- from a Customer, business partner or their authorised representatives;
- automatically when the website, Platform or support channels are used;
- from systems integrated with the Platform;
- from lawfully available business sources.

Where personal data has not been obtained directly from the data subject, it may include, in particular, identification, contact and professional data.

5. Purposes and Legal Bases of Processing

5.1. Enquiries, Product Demonstrations and Proposals

Personal data is processed in order to respond to enquiries, present the product, arrange product demonstrations and prepare proposals.

Legal basis: Article 6(1)(b) or (f) GDPR.

5.2. Entering into and Performing an Agreement

Personal data is processed in order to enter into and perform agreements, manage the relationship with the Customer and provide the agreed services.

Legal basis: Article 6(1)(b) GDPR and, in the case of the Customer's representatives and contact persons, also Article 6(1)(f) GDPR.

5.3. Billing and Legal Obligations

Personal data is processed in order to issue invoices, maintain accounting records and comply with tax, accounting and other legal obligations.

Legal basis: Article 6(1)(b) or (c) GDPR.

5.4. Customer Service and Technical Support

Personal data is processed in order to handle support requests, diagnose issues, provide assistance and communicate about the services.

Legal basis: Article 6(1)(b) or (f) GDPR.

5.5. Security and Service Development

Technical data, logs and diagnostic information may be processed in order to protect the Platform, prevent abuse, ensure service continuity, analyse errors and improve service quality.

Legal basis: Article 6(1)(f) GDPR.

5.6. Marketing of Our Own Services

Personal data may be processed in order to provide information about 2BITS products, services and events.

Legal basis: Article 6(1)(f) GDPR and, where required, the applicable electronic communications legislation.

5.7. Newsletter and Consent-Based Communications

An email address and communication preferences may be processed in order to send a newsletter or other communications requiring consent.

Legal basis: Article 6(1)(a) GDPR.

5.8. Legal Claims

Personal data may be processed for the establishment, exercise or defence of legal claims.

Legal basis: Article 6(1)(f) GDPR.

6. Legitimate Interests

Where processing is based on Article 6(1)(f) GDPR, the legitimate interests pursued by 2BITS may include:

- conducting business communications and managing relationships with Customers and business partners;
- marketing our own services;
- ensuring the security, stability and proper operation of the services;
- analysing and developing products and service processes;
- preventing abuse;
- establishing, exercising and defending legal claims.

7. Data Retention Period

Personal data is retained for as long as necessary to fulfil the purpose for which it was collected and thereafter for the period required by law or necessary for the establishment, exercise or defence of legal claims.

In particular:

- data relating to enquiries and proposals is retained for the duration of the relevant discussions and for a period justified by the need to document the contact and protect against legal claims;
- data relating to an agreement is retained for the term of the agreement and until the expiry of the applicable limitation periods for legal claims;
- accounting and tax records are retained for the period required by law;
- support-related data is retained for the duration of the relevant case and for a period justified by the need to document service performance and protect against legal claims;

- logs and security data are retained in accordance with the applicable retention rules and for as long as necessary to ensure the security of the services;
- data processed on the basis of consent is retained until consent is withdrawn or the purpose of processing ceases to apply;
- data used for direct marketing is retained until an effective objection is made or the purpose ceases to apply.

8. Recipients of Personal Data

Personal data may be disclosed to:

- authorised employees and contractors of 2BITS;
- providers of hosting, infrastructure, email, communication tools, CRM, ticketing systems, analytics, security, accounting, invoicing and payment services;
- legal and tax advisers, auditors and insurers;
- public authorities and other entities authorised by law.

Entities processing personal data on behalf of 2BITS act under appropriate agreements and are required to maintain confidentiality and implement appropriate safeguards.

9. Transfers of Personal Data Outside the European Economic Area

2BITS seeks to process personal data within the European Economic Area. Where personal data is transferred outside the EEA, the transfer is carried out in accordance with Chapter V of the GDPR, in particular on the basis of:

- an adequacy decision adopted by the European Commission;
- standard contractual clauses approved by the European Commission;
- another mechanism provided for by law.

Where necessary, supplementary safeguards appropriate to the risks associated with the transfer are applied.

10. Data Security

2BITS implements technical and organisational measures appropriate to the nature of the personal data, the scope of processing and the risk to the rights and freedoms of natural persons.

Such measures may include, in particular, encryption in transit, access controls, permission management, event logging, backups, monitoring, vulnerability management, incident response procedures and confidentiality obligations for personnel.

11. Rights of Data Subjects

To the extent provided for by the GDPR, a data subject may have the right to:

- access their personal data and obtain a copy thereof;
- rectify or complete their personal data;
- erase their personal data;
- restrict processing;
- data portability;
- object to processing based on legitimate interests;

- withdraw consent at any time, without affecting the lawfulness of processing carried out before its withdrawal;
- lodge a complaint with the competent supervisory authority.

The scope and availability of a particular right depend on the legal basis, the purpose of processing and the circumstances of the case.

12. Exercising Data Subject Rights

Requests concerning the exercise of data subject rights may be submitted to privacy@2bits.pl.

2BITS may request information necessary to verify the identity of the person submitting the request and to protect personal data against unauthorised disclosure.

Requests are handled without undue delay and within the time limits prescribed by the GDPR.

Where 2BITS processes personal data solely on behalf of a Customer, the request should in the first instance be directed to that Customer. 2BITS assists the Customer in meeting its obligations in accordance with the DPA.

13. Right to Lodge a Complaint

A person who believes that their personal data is being processed unlawfully may lodge a complaint with the competent supervisory authority.

In Poland, the competent authority is:

President of the Personal Data Protection Office
ul. Stawki 2
00-193 Warsaw
uodo.gov.pl

14. Personal Data of Minors

2BITS services are primarily intended for organisations and business users. 2BITS does not knowingly collect personal data of minors for its own marketing purposes.

Where a Customer uses the Platform to process personal data of minors, the Customer is responsible for ensuring an appropriate legal basis, providing the required privacy information and implementing appropriate safeguards.

15. Automated Decision-Making and Profiling

As a general rule, 2BITS does not make decisions concerning individuals based solely on automated processing that produce legal effects or similarly significantly affect them.

The Platform may use automation, reporting, search, recommendation or personalisation features. Where such features are used in a Customer environment, the Customer determines the purpose and manner of their use.

16. Cookies and Similar Technologies

The MyLearningDay website and the Platform may use cookies, local storage, session identifiers and similar technologies in order to:

- ensure the proper operation and security of the services;
- maintain sessions and remember settings;
- diagnose errors and measure performance;
- analyse the use of the website;
- conduct marketing activities where the required consent has been given.

Detailed information about the technologies used, their providers, purposes and duration is provided in a separate Cookie Policy and in the consent management tool.

17. Changes to this Policy

This Policy may be updated in response to changes in the law, services, data processing practices or safeguards applied.

The current version of this document is published together with its version number and effective date. 2BITS provides notice of material changes where required by law or by an applicable agreement.

18. Related Documents

- **MyLearningDay Terms of Service** – sets out the rules governing the conclusion and performance of the Agreement.
- **EULA** – sets out the rules governing the use of the Platform, licensing, technical support and the SLA.
- **Data Processing Agreement (DPA)** – sets out the rules governing the processing of personal data by 2BITS on behalf of the Customer.
- **Cookie Policy** – provides information about cookies and similar technologies.

Document Information

- **Version:** 5.0
- **Effective date:** 1 August 2026
- **Last updated:** 2 July 2026
- **Document owner:** 2BITS