

PRIVACY POLICY

TRANSLATION NOTICE

This document is an English translation of the Polish-language document “Polityka prywatności” effective from 1 January 2026. The translation is provided for information purposes only.

The Polish version is the original and the only binding version. In the event of any discrepancies between the Polish and English versions, or any doubts as to the interpretation, the Polish version shall prevail.

GENERAL INFORMATION

1. The purpose of the Privacy Policy is to provide information on the processing of personal data in connection with the business activity conducted by Inspecto, including in connection with the provision of the Application. Whenever the following terms are used in the Privacy Policy:

Application	means software provided in the SaaS (Software as a Service) model, used for vehicle fleet management, owned and provided by Inspecto;
Inspecto	means Inspecto sp. z o.o. with its registered office in Warsaw, ul. Świętokrzyska 30 lok. 63, 00-116 Warsaw, Poland, KRS: 0000740756, NIP: 5771986272, REGON: 38081371;
Client	means an entity (an entrepreneur or another organisational unit) that has concluded an agreement with Inspecto for the use of the Application;
Policy	means this Privacy Policy;
Website	means the website getinspecto.com and all pages dedicated to Clients created according to the pattern “ klient.getinspecto.com ” (where “klient” stands for the name of the Client);
User	means a person who has been authorised by the Client to use the Application, in particular an employee or associate of the Client (e.g. a driver or a fleet manager).

2. The Privacy Policy sets out how Inspecto uses the personal data of Website users as well as of Users and Clients who interact with it and use the functionalities available on the Website or in the Inspecto Application. It also provides information on the rights of the user and on how the law protects Website users and Users.
3. The Website may lead (link) to other websites, including websites of entities not affiliated with Inspecto. The rules for the processing of personal data on those websites are governed by their providers.

ROLE OF INSPECTO

4. Key to understanding the data protection rules is the distinction between the roles that Inspecto plays in processing operations, in accordance with the provisions of the GDPR:
 - a. Inspecto as the controller of personal data: with regard to the data of representatives of its Clients (contact persons, persons authorised to conclude the agreement) and the data of Website users. In this role, Inspecto independently determines the purposes and means of the processing;
 - b. Inspecto as a processor: with regard to any data entered into the Application by the Client or its Users (e.g. drivers' data, vehicle data). In this role, Inspecto processes the data solely on the documented instructions of the Client, who is the controller of that data. The rules of this processing are governed by a separate Personal Data Processing Agreement, which forms an integral part of the service agreement.
5. The Policy is informative in nature. Its purpose is to provide data subjects with full information on the processing of their data and on the rights they have.
6. The Privacy Policy may be amended in the future. Each time the provisions of the privacy policy are amended, the updated version of the privacy policy will be published on the Website.

PERSONAL DATA CONTROLLER

7. In the situation described in section 4.a of the Privacy Policy, the controller of personal data is Inspecto sp. z o.o. with its registered office in Warsaw, ul. Świętokrzyska 30 lok. 63, 00-116 Warsaw, Poland, KRS: 0000740756, NIP: 5771986272, REGON: 38081371. Inspecto can be contacted as follows:
 - a. via the contact form available on the Website;
 - b. by e-mail, by sending a message to: biuro@getinspecto.com;
 - c. by telephone, from Monday to Friday (excluding public holidays) between 9:00 and 17:00, by calling: (+48) 690 228 703 (charged according to the operator's tariff).

PURPOSES, LEGAL BASES AND SCOPE OF DATA PROCESSING

8. When Inspecto acts as the data controller:

Business partners of Inspecto (including Clients)	Inspecto collects data in connection with the provision of services and in connection with services provided to Inspecto by its business partners. The collection of data concerns current and future business partners of Inspecto.
	This data may include: first name, surname, e-mail address, telephone number, tax identification number and other numbers in registers in which the business partner is entered, business address and bank account number. Depending on the circumstances and on the business partner, the scope of data may vary, of which the business partner is informed by Inspecto.
	Inspecto processes this data for the purposes of:

	a. taking steps at the request of the business partner prior to entering into an agreement (e.g. presenting an offer concerning Inspecto's services) (Article 6(1)(b) GDPR); b. concluding and performing the agreement by Inspecto (Article 6(1)(b) GDPR); c. complying with tax and legal obligations (Article 6(1)(c) GDPR); d. pursuing the legitimate interests of Inspecto, comprising the establishment, pursuit and defence of possible claims, maintaining ongoing relations with business partners in the course of cooperation, verification of the business partner and internal settlements (Article 6(1)(f) GDPR). The data is collected directly from Inspecto's business partners. Providing the data is voluntary; however, failure to provide some of it may make it impossible to conclude or perform the agreement, or may result in a refusal to do so and, in cases provided for by law, also in the termination of the agreement. Data may also be collected from public registers such as the Court and Economic Gazette (Monitor Sądowy i Gospodarczy), the National Court Register (KRS), the Central Register and Information on Economic Activity (CEIDG), the Central Register of Beneficial Owners or other domestic and foreign registers relevant to the client or business partner. The data is stored for a period of three (3) years (from the end of the calendar year in which the data was obtained), counting from the date of performance of the agreement or its termination. However, data contained in accounting documents is stored for a period of five (5) years (from the end of the calendar year). These periods may be extended where Inspecto pursues its legitimate interests comprising the establishment, pursuit and defence of possible claims.
Representatives and personnel of business partners (including representatives and personnel of Clients)	Inspecto collects data in connection with the provision of the Application and in connection with services provided to Inspecto by its business partners. The collection of data concerns current and future representatives and personnel of Inspecto's business partners. This includes members of governing bodies, commercial proxies (prokurent) and attorneys, employees and associates of the business partner who take part in the conclusion and performance of the agreement with Inspecto, as well as data of third parties who perform activities for the business partner related to the conclusion and performance of the agreement with Inspecto (e.g. legal advisers, accountants). This data may include: first name, surname, e-mail address, telephone number, tax identification number and other numbers

	in registers in which the representative or personnel of the business partner is entered, business address and bank account number. For members of governing bodies and commercial proxies: PESEL number (Polish national identification number). Depending on the circumstances and on the business partner, the scope of data may vary, of which the business partner is informed by Inspecto. Inspecto processes this data for the purposes of: - contact in connection with the conclusion or performance of the agreement with the business partner (Article 6(1)(f) GDPR); - pursuing the legitimate interests of Inspecto, comprising the establishment, pursuit and defence of possible claims, maintaining ongoing relations with business partners in the course of cooperation, verification of the business partner and internal settlements (Article 6(1)(f) GDPR); - complying with tax and legal obligations (Article 6(1)(c) GDPR). The data is collected directly from the data subjects or from other sources, including Inspecto's business partners. Providing the data is voluntary; however, failure to provide some of it may make it impossible to conclude or perform the agreement, or may result in a refusal to do so and, in cases provided for by law, also in the termination of the agreement. Data may also be collected from public registers such as the Court and Economic Gazette (Monitor Sądowy i Gospodarczy), the National Court Register (KRS), the Central Register and Information on Economic Activity (CEIDG), the Central Register of Beneficial Owners or other domestic and foreign registers relevant to the client or business partner. The data is stored for the duration of the communication and thereafter for a period of three (3) years (from the end of the calendar year), counting from the date of performance of the agreement or its termination. However, data contained in accounting documents is stored for a period of five (5) years (counting from the end of the calendar year). These periods may be extended where Inspecto pursues its legitimate interests comprising the establishment, pursuit and defence of possible claims.
Persons contacting Inspecto	Inspecto collects data in connection with interactions with Inspecto undertaken by e-mail, by post, by telephone or via the Website. This data may include: first name, surname, e-mail address, telephone number and affiliation (associated company).

	Depending on the circumstances and on the person concerned, the scope of data may vary, of which the persons are informed by Inspecto. Inspecto processes this data for the purposes of: - contacting the person and handling the matter raised by that person (Article 6(1)(f) GDPR); - in some cases, pursuing the legitimate interests of Inspecto comprising the establishment, pursuit and defence of possible claims (Article 6(1)(f) GDPR). The data is collected directly from the data subjects. Providing the data is voluntary; however, failure to provide some of it may make it impossible to respond or to handle the matter raised by the person concerned. The data is stored for the period resulting from the purpose of its processing, taking into account the purpose of the enquiry. Usually this period is six (6) months. This period may be extended where Inspecto pursues its legitimate interests comprising the establishment, pursuit and defence of possible claims.
Persons interacting with the company profile on social media	Inspecto collects data in connection with the company profiles it runs on social media platforms. These platforms include: Facebook (Meta) and LinkedIn. Inspecto processes the personal data of persons visiting Inspecto's profile, users of the platform following the profile and users of the platform who post comments on the content published on Inspecto's profile or otherwise interact with Inspecto's profile. This data includes: data provided by the user when interacting with Inspecto's profile. In addition, Inspecto obtains data from the operator of the given platform, which may include: user ID, first name and surname, and the content of comments published on Inspecto's profile. Inspecto processes this data for the purposes of: - running Inspecto's profile on the given platform (Article 6(1)(f) GDPR); - informing about Inspecto's activities (Article 6(1)(f) GDPR); - responding to comments published by users of the given platform (Article 6(1)(f) GDPR); - conducting analyses and statistics concerning the functioning and the use of Inspecto's profile by users (Article 6(1)(f) GDPR); - in some cases, pursuing the legitimate interests of Inspecto comprising the establishment, pursuit and defence of possible claims (Article 6(1)(f) GDPR).

	The data is collected directly from the data subjects and through the functionalities of the given platform. Providing the data is voluntary; however, failure to provide some of it may prevent the user from fully using the functionalities available on Inspecto's profile. The data is stored for the period determined by the given social media platform.
Persons interacting with Inspecto in connection with recruitment	Inspecto collects data in connection with the recruitment processes it conducts. The collection of data concerns current and future employees of Inspecto. This data includes: data provided during the recruitment process (including data contained in the CV, cover letter or correspondence concerning the recruitment). Where data is provided which there is no obligation to provide to Inspecto, or which Inspecto is not entitled to request, Inspecto treats this as consent to the processing of that data for recruitment purposes, which is voluntary and may be withdrawn at any time. Inspecto processes this data for the purposes of: a. complying with obligations under labour law related to the employment process, where the intended form of employment is an employment contract (Article 22¹ § 1 points 1–6 of the Polish Labour Code in conjunction with Article 6(1)(c) GDPR, or Article 22¹ § 1 points 1–3 of the Labour Code in conjunction with Article 6(1)(c) GDPR; the basis differs where it is not necessary to obtain the data referred to in Article 22¹ § 1 points 4–6 of the Labour Code); b. conducting the recruitment process where the intended form of engagement is a civil-law contract (Article 6(1)(b) GDPR); c. verifying the candidate's knowledge, abilities and skills (Article 6(1)(f) GDPR); d. in some cases, pursuing the legitimate interests of Inspecto comprising the establishment, pursuit and defence of possible claims (Article 6(1)(f) GDPR). Inspecto will also process personal data in future recruitment processes if the persons concerned have consented to this (Article 6(1)(a) GDPR). This consent is voluntary and may be withdrawn at any time. The data is collected directly from the data subjects. Providing the data is voluntary; however, where employment under an employment contract is intended, failure to provide the data specified in Article 22¹ § 1 of the Labour Code will make it impossible to consider the application.

	The data will be stored for the duration of the recruitment for the position to which the application relates. To the extent that the candidate's personal data is processed on the basis of the candidate's consent to the processing of data not required by law, the data will be stored for the duration of the recruitment for the position to which the application relates. To the extent that the candidate's personal data is processed on the basis of the candidate's consent to participate in future recruitment processes, the data is stored until the consent is withdrawn or for a period of twelve (12) months, whichever occurs first. The storage period may be extended where Inspecto pursues its legitimate interests comprising the establishment, pursuit and defence of possible claims.
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9. When Inspecto acts as a processor:

Data of Users and data entered by Users	Inspecto processes data in connection with the performance of agreements for the provision of the Application to Clients. The agreement consists in making the functionalities of the Application available to the Client. The purposes of processing data in the Application (e.g. vehicle mileage records, settlement of damage) are determined by the Client, who acts as the controller of personal data in this relationship.
	The processing takes place on the basis of Article 28 GDPR, under the Data Processing Agreement concluded with the Client. The legal basis for the processing of data by the Client is determined by the Client itself.
	The scope of data is defined by the Client and may include in particular: first name and surname, e-mail address, telephone number, account language, company department, signature, vehicle registration numbers and photos (including selfies or photos of identity documents, if required by the Client's procedure).
	The data is stored for the period specified by the Client in the Data Processing Agreement and, after that period, will be permanently deleted or returned in accordance with the Client's instructions.

RECIPIENTS OF DATA. TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

10. To ensure the proper functioning of the Application, Inspecto uses the services of external entities (further processors, so-called sub-processors). We transfer data only to entities that guarantee the implementation of appropriate technical and organisational measures so that the processing meets the requirements of the GDPR. Data may be transferred to:

- a. providers of cloud infrastructure, e.g. Amazon Web Services (AWS);
 - b. providers of accounting and legal services, to the extent necessary to provide those services;
 - c. operators of analytics systems (e.g. Google Analytics).
11. Data is always transferred on the basis of a data processing agreement or another legal instrument compliant with the GDPR.
12. As a rule, Inspecto processes personal data on servers located within the European Economic Area. Where Inspecto uses the services of providers whose data centres are located outside the EEA (e.g. in the USA), Inspecto ensures that the data transfer takes place on the basis of appropriate legal mechanisms, such as standard contractual clauses approved by the European Commission, guaranteeing an adequate level of protection.

RIGHTS OF DATA SUBJECTS

13. The data subject (user) has the following rights:

Right of access, rectification, restriction, erasure or portability	the data subject has the right to request from Inspecto access to their personal data, its rectification, erasure (“right to be forgotten”) or restriction of processing, has the right to object to the processing, and has the right to data portability. The detailed conditions for exercising the above rights are set out in Articles 15–21 of the GDPR.
Right to withdraw consent at any time	a data subject whose data is processed by Inspecto on the basis of consent (pursuant to Article 6(1)(a) or Article 9(2)(a) GDPR) has the right to withdraw that consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.
Right to lodge a complaint with a supervisory authority	a data subject whose data is processed by Inspecto has the right to lodge a complaint with the supervisory authority in the manner and under the procedure set out in the GDPR and Polish law, in particular the Personal Data Protection Act. The supervisory authority in Poland is the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych).
Right to object	the data subject has the right to object at any time, on grounds relating to their particular situation, to the processing of

	personal data concerning them which is based on Article 6(1)(e) (public interest or public tasks) or (f) (legitimate interest) of the GDPR. In such a case, Inspecto may no longer process that personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or grounds for the establishment, exercise or defence of legal claims.
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14. Data subjects exercise their rights by contacting Inspecto using the contact details set out at the beginning of the Privacy Policy.

EXERCISE OF RIGHTS DEPENDING ON THE ROLE OF INSPECTO

15. Depending on whether Inspecto acts as the data controller or as a processor, the rights are exercised differently, i.e.:
- a. if the request concerns data for which Inspecto is the controller (the requester is a contact person at the Client), the request should be addressed directly to Inspecto;
 - b. if the request concerns data for which Inspecto is a processor (e.g. requests from drivers) and concerns data entered into the Application, the controller of that data is the Client. In such a case, all requests concerning the exercise of rights should be addressed directly to the Client. Inspecto, as the processor, will handle the request only on the documented instructions of the controller.

DATA SECURITY

16. Inspecto declares that it applies appropriate technical and organisational measures to ensure the protection of the personal data processed, appropriate to the risks and to the categories of data protected, and in particular secures the data against disclosure to unauthorised persons, removal by an unauthorised person, processing in breach of the law, and alteration, loss, damage or destruction.