CONTEST RULES "The Best Story with Vasco"

§ 1 GENERAL PROVISIONS

- The organizer of the contest is Vasco Electronics Góralski Group S.K.A. (a joint-stock limited partnership), headquartered in Krakow (31-401), Al. 29 Listopada 20, Poland, registered in the Register of Entrepreneurs maintained by the District Court for Kraków-Śródmieście in Kraków, 11th Commercial Division of the National Court Register under KRS number: 0000421705, NIP: PL6772369151, REGON: 122581850 (hereinafter: the "Organizer").
- These rules (hereinafter: "Rules") set out the terms and conditions for participation in the contest organized by the Organizer under the name "The Best Story with Vasco" (hereinafter: "Contest").
- 3. The Contest is conducted on the Facebook platform through the Organizer's fan pages available at:
 - <u>https://www.facebook.com/vascotranslatorpolska</u>
 - <u>https://www.facebook.com/VascoTranslatorMagyarorszag</u>
 - https://www.facebook.com/VascoTranslatorBulgaria
 - <u>https://www.facebook.com/VascoTranslatorCeskaRepublika</u>
 - <u>https://www.facebook.com/VascoTranslatorFrance/</u>
 - <u>https://www.facebook.com/VascoTranslator/</u>
 - <u>https://www.facebook.com/VascoTranslatorHrvatska/</u>
 - https://www.facebook.com/VascoTranslatorRomania
- 4. (hereinafter collectively referred to as "Fanpage").
- 5. The Contest takes place in the following countries: Poland, Hungary, Bulgaria, France, Czech Republic, Croatia, Romania.
- 6. The Contest duration is from February 17, 2025, at 09:00 AM to February 24, 2025, at 11:59 PM (hereinafter: "Contest Period").
- 7. The Contest is in no way organized, supported, or sponsored by Facebook. Facebook bears no responsibility for the organization or execution of this Contest.
- 8. Participation in the Contest is free and voluntary.
- 9. By entering the Contest, the Participant declares that they have read and understood these Rules and agree to comply with them. Furthermore, the Participant confirms that they meet all conditions specified in the Rules that entitle them to participate in the Contest.

- 1. Only adults with full legal capacity residing in one of the countries listed in § 1.4 of the Rules, who have a verified Facebook account, may participate in the Contest (hereinafter: "Participant").
- 2. Employees and representatives of the Organizer and their immediate family members are not eligible to participate in the Contest. Immediate family members include ascendants, descendants, siblings, spouses, parents-in-law, cousins, and adopted children.
- The contest task requires Participants to submit a text response (comment) answering the following question: "Describe a story in which Vasco Translator made your life easier." along with a photo of the Participant with their Vasco Translator (hereinafter: "Contest Task").
- 4. To participate in the Contest, the Participant must submit their response during the Contest Period. The Contest Task must be posted as a comment under the Organizer's contest post on the Fanpage (hereinafter: "Contest Post").
- 5. Submitting the Contest Task under a post other than the Contest Post or outside the Contest Period will not be considered a valid entry.
- 6. Contest participation must be personal, using one's own Facebook account. Participants must have a verified Facebook profile containing their real name, surname, and date of birth. Entries made on behalf of third parties or through third-party accounts are not allowed. If the Organizer detects fraudulent activity, including fake accounts or software manipulation, they reserve the right to disqualify the Participant.
- 7. The moment of publishing the Contest Task is the time when the comment is recorded on Facebook's server.
- 8. Posting a Contest Task comment implies the Participant's acceptance of these Rules in full and without reservation.
- 9. Participants may ask questions regarding the Contest by sending a private message via the Organizer's Fanpage on Facebook.
- 10. The Organizer reserves the right to exclude a Participant from the Contest in cases such as:
- Violation of third-party rights, including personal rights and intellectual property;
- Use of inappropriate, offensive, discriminatory, political, religious, or unlawful content in the Contest Task;
- Any form of cheating or attempting to manipulate the Contest results.

§ 3

CONTEST COMMITTEE

- 1. To ensure the proper organization and course of the Contest, particularly for evaluating the validity of Contest entries and selecting the Contest winners, the Organizer will appoint a contest committee (hereinafter referred to as the "Committee").
- 2. From among all Contest Participants who have responded to the Contest Task and meet the participation criteria specified in § 2 of the Rules, the Committee will select the Contest winner (hereinafter referred to as the "Laureate"), who will be awarded the

Prize—separately for each fan page through which the Contest is organized (§ 1(3) of the Rules).

- 3. The Committee will consist of five (5) members appointed by the Organizer.
- 4. When evaluating the Contest Tasks, the Committee will apply the following criteria:
 - a). Originality of the response to the Contest Task
 - b). Ingenuity and creativity of the response to the Contest Task
- 5. The Committee's responsibilities include:
 a). Assessing the validity of submitted Contest Task entries
 b). Deciding the outcome of the Contest Task in accordance with these Rules and selecting the Laureates
 c). Handling complaints and appeals

7. Verification of the right to receive the Prize will be conducted as follows: After announcing the Contest results, the Organizer will send a private message to the Laureates of the Contest.

8. The Organizer is not responsible for any inability or difficulty in claiming the Prize due to reasons attributable to the Laureate. The Laureate is not entitled to a cash equivalent or any other form of compensation for the Prize. The Laureate will lose the right to receive the Prize in the event of violating any provision of the Rules. If a violation of the Rules is discovered after the Prize has been awarded, the Laureate is required to return the Prize along with all associated rights and obligations.

9. Material prizes will be sent to the addresses provided by the Contest Laureates, exclusively to the countries specified in § 1(4) of these Rules.

§ 4 PRIZES

- 1. The prizes in the Contest are funded by the Organizer.
- The prizes in the Contest are: seven (7) Vasco Translator E1 devices—one (1) Vasco Translator E1 device awarded to the Contest Laureate selected on each fan page through which the Contest is organized (§ 1(3) of the Rules).
- 3. As a condition of receiving the Prize, the Laureate is required to provide the Organizer with the following information: full name, mailing address, email address, the tax office address applicable to the Laureate (if a prize tax needs to be paid), and phone number. If there is any doubt regarding the Participant's compliance with the Contest participation conditions specified in § 2(1) of the Rules, the Organizer may request the Participant to send a scanned copy of an identity document to confirm eligibility.
- 4. The Contest Laureates are not entitled to exchange the Prize for cash or any other tangible rewards.

- 5. The Laureate does not have the right to specify any particular features of the Prize. All content included in the advertising and promotional materials related to this Contest is for informational purposes only.
- 6. The material prizes will be sent to the address provided by the Participant in the form of a courier shipment.
- 7. The Organizer will announce the Contest Laureates in a dedicated post published on the Organizer's Fan Pages on Facebook no later than February 28, 2025. Additionally, beyond announcing the Laureates on Facebook, the Organizer will contact them directly via private message on Facebook by the next business day at the latest and inform them of the Prize won.
- 8. Within 48 hours of receiving the message from the Organizer, the Laureate must accept or decline the Prize. Declining the Prize may be done in a documented form.
- 9. The Organizer is not responsible for the inability to notify the Laureate of their win in cases where: 1.) The Laureate has provided incorrect contact details, 2.) the Laureate's Facebook profile has been blocked or deleted, 3.) any other technical issues beyond the Organizer's control prevent communication with the Laureate
- 10. The Organizer reserves the right to exclude a Laureate (resulting in the loss of their right to the Prize) and to select a new Laureate in place of the excluded Laureate in the following cases:

1). Refusal to provide the Organizer with the personal data specified in § 4(3) of the Rules

- 2). Inability to contact the Laureate due to reasons beyond the Organizer's control
- 3). The Laureate's voluntary refusal of the Prize

In the event of a Laureate's exclusion, the Prize will be awarded to another Laureate, selected by the Committee by majority vote from the original Contest participants on the respective fan page. If a new Laureate is selected, the provisions of this paragraph will apply to each subsequently chosen Laureate.

§ 5 PERSONAL DATA PROTECTION

- The administrator of personal data is the Organizer, i.e., Vasco Electronics Góralski Group Spółka Komandytowo-Akcyjna, headquartered at Al. 29 Listopada 20, 31-401 Kraków, registered in the Register of Entrepreneurs of the National Court Register kept by the District Court for Kraków-Śródmieście in Kraków, 11th Commercial Division of the National Court Register under KRS number 0000421705, with a share capital of 50,000.00 PLN, fully paid, NIP 6772369151, REGON 122581850.
- 2. The Organizer will collect personal data for purposes related to organizing the Contest, including determining the Laureates, verifying their information, and awarding the Prizes (legal basis: art. 6 ust. 1 lit. f RODO), as well as for fulfilling tax obligations related to withholding and paying applicable tax on Contest Prizes (legal basis: art. 6 ust. 1 lit. c

RODO). Additionally, data processing will serve the legally justified interests of the Organizer, such as handling Participant complaints and serving as evidence in case of legal claims related to the Contest (legal basis: art. 6 ust. 1 lit. f RODO).

To ensure proper organization and efficient administration, the following entities may receive Participants' personal data:

a). Legal and advisory service providers supporting the Organizer in pursuing legal claims (particularly law firms)

b). Service providers supplying the Organizer with technical and organizational solutions necessary for conducting the Contest

c). Business process support providers (particularly IT service providers and hosting companies)

d). Carriers, i.e., courier companies, through which the Organizer will deliver Vasco Translator E1 devices to the Laureates

- 3. By posting a comment under the Contest Post, the User expresses their consent to the processing of their personal data in connection with their participation in the Contest.
- 4. Participants' personal data will not be transferred outside the European Union by the Administrator.
- 5. For the Facebook platform, any data transfer outside the European Economic Area will be carried out in accordance with Facebook's Privacy Policy and Terms of Service
- 6. Participants' personal data will be processed for as long as necessary to fulfill the processing purpose, i.e., for the duration of the Contest. For the Laureates, data will also be processed for the period required by tax regulations. In case of legal claims, personal data will be processed until the limitation period expires, as specified by the Civil Code. After these periods, data will be deleted or anonymized.
- 7. Contest Participants have the right to access, rectify, request deletion or restriction of processing, transfer their data to another administrator, and object to processing.
- 8. The Organizer informs that Participants have the right to file a complaint with the supervisory authority responsible for personal data protection, i.e., the President of the Personal Data Protection Office.
- 9. Providing personal data by the Participant is voluntary but necessary for participation in the Contest.
- 10. Processing of the Laureates' personal data for marketing purposes may require them to sign additional, relevant documents.
- 11. The Administrator will comply with adopted data protection standards when handling Participants' data, with particular attention to their rights and interests.
- 12. Participants' personal data will not be processed automatically, including profiling.
- 13. A Participant may withdraw their previously given consent to data processing at any time by providing the Organizer with an appropriate document-form statement, allowing the Organizer to acknowledge its content. Withdrawal of consent does not affect the lawfulness of data processing carried out before the withdrawal. However, withdrawing consent as described in this paragraph also constitutes withdrawal from the Contest and, in the case of Laureates, forfeiture of the right to the Prize.

§ 6 COPYRIGHT

- Participants may submit only content of their own authorship to the Contest. The Organizer has the right to verify at any time the content of comments posted under the Contest Post, considering the criterion of authorship. If it is determined that a given comment infringes upon the copyright of others, the Organizer is entitled to disqualify the Participant responsible for the infringement at any stage of the Contest.
- 2. The right to disqualify a Participant also includes the right to revoke the Prize. In such a case, the Participant has the right to file a complaint in accordance with the Contest Rules.
- 3. The Participant bears full responsibility for any infringement of proprietary or personal copyrights of third parties in connection with the publication of their response to the Contest Task. The Participant agrees to reimburse the Organizer for any costs incurred as a result of violations of the rights or interests of third parties due to the use of defective content, as mentioned in the previous sentence.
- 4. A Participant may be disqualified from the Contest at any time if the Committee determines that their Contest Task does not comply with the Contest Rules or if third parties submit claims to the Organizer related to the Participant's response to the Contest Task.
- 5. The Contest Task submitted by Participants may be published on the Internet, in the Organizer's promotional campaigns, or in the media of entities cooperating with the Organizer without mentioning the author's name, to which Participants agree.
- 6. By submitting a Contest Task, the Participant grants the Organizer a non-exclusive and free license, with the right to sublicense, to use the response to the Contest Task without time and territorial limitations for purposes related to the organization of the Contest as well as for the Organizer's marketing and promotional activities, on the following fields of exploitation:

a) Recording using all known techniques on all known media, including, in particular, recording using analog, digital, and optical techniques.

- b) Introducing into circulation, lending, or renting reproduced copies or copies.
- c) Reproduction using any known digital, analog, and optical techniques.
- d) Publication on large-format media (both external and internal).

e) Repeated public display.

f) Use on the Internet, on websites, via telephone or satellite connections, wired or wireless, using digital or analog techniques.

g) Public access in such a way that anyone can access it at a place and time of their choosing.

h) Use in marketing activities, including advertising and marketing of the Organizer's products and brand.

i) Use for the creation of derivative works and subsequent use of such works in the manner specified in points a) to h).

7. The Participant agrees that the Organizer may make any changes, alterations, or modifications to the Contest Task as needed.

- 8. If the Contest Task contains an image, by submitting the Contest Task, the Participant declares that they consent to the multiple use of the image contained in the Contest Task on all fields of exploitation specified in the paragraph above. This consent is not limited in time or territory.
- 9. If the Contest Task contains images of third parties, the Participant declares that they have obtained permission to use the image of those individuals.

§ 7 COMPLAINT PROCEDURE

- 1. Any complaints regarding the manner in which the Contest is conducted may be submitted by Participants in writing to the Organizer's address or via email to social-media-admin@vasco-electronics.com during the Contest Period and no later than four (4) days from the date of publication of the list of Contest Winners. Complaints sent to the Organizer's registered address as well as those sent to the Organizer's email address will be considered. The date of receipt by the Organizer, either at the registered address or via email, determines whether the complaint has been submitted within the deadline. Complaints submitted after this deadline will not be considered. Complaints will be reviewed by the Committee.
- 2. A complaint must include: The Participant's first and last name, Exact mailing address, The reason for the complaint along with its justification, The Participant's email address.
- 3. The complaint will be reviewed within **seven (7) business days** from the date of its receipt. Depending on the method of submission, the Participant will be notified of the outcome by the Organizer via email or postal correspondence to the address provided by the Participant.
- 4. Complaints will be considered based on these Contest Rules.
- 5. The decision of the Organizer regarding the complaint is final and binding.

§ 8 FINAL PROVISIONS

- 1. The Contest Rules are available at the Organizer's headquarters at the following address: Kraków (31-401), Aleja 29 Listopada 20, as well as on the Organizer's dedicated website (the link to the Rules will be available in the Contest Post on the Organizer's Fan Pages).
- 2. The Organizer reserves the right to amend the Rules, provided that such changes do not worsen the Participant's conditions or the rules of participation in the Contest. In the event of any amendments to the Rules, information regarding the changes and the updated Rules will be published on the Organizer's Fan Pages in a way that ensures all Participants have access to them.
- 3. In matters not regulated by these Rules, the provisions of generally applicable law shall apply, in particular the provisions of the Polish Civil Code.

- 4. The deadline for submitting messages, information, correspondence, or any other shipment required by these Rules shall be determined by the date of receipt at the Organizer's address or the date of receipt of an email in the Organizer's electronic inbox, unless otherwise stated in these Rules.
- 5. All disputes shall be settled by the common court with jurisdiction over the Organizer's registered office.
- 6. These Rules come into effect on February 17, 2025.