

PRIVACY POLICY AND COOKIES

POLICY

Using the website <https://cleansery.com/> constitutes acceptance of the following terms of the Privacy Policy and Cookies Policy.

As a User, please read its provisions. The table of contents below will help you with this. I inform you how I care for Users' data, how I process it, who I entrust it to and many other important issues related to personal data.

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§1 GENERAL PROVISIONS

This Privacy Policy and Cookies Policy defines the rules for the processing and protection of personal data provided by Users and Cookies, as well as other technologies appearing on the website <https://cleansery.com/>

The administrator of the website and personal data transferred within it is Cleansery Sp. z o. o

Cleansery Sp. z o. o. with its registered office in 30-554 Kraków, ul. Closed 10/1.5, entered into the Register of Entrepreneurs of the National Court Register under the KRS number: 0000988474 NIP 6793246399, REGON 522889239, share capital in the amount

of PLN 10,000, in accordance with the information corresponding to the current excerpt from the Register of Entrepreneurs contained in the Central Information of the National Court Register,

represented by Andrzej Suwara – President of the Management Board,

I care about the security of personal data and the privacy of the Website User. I'm glad you visited my Website.

If you have any doubts regarding the provisions of this Privacy Policy and Cookies Policy, please contact the Administrator via e-mail: info@cleansery.com

The Administrator reserves the right to make changes to the privacy policy, and each User of the website is obliged to be familiar with the current privacy policy. The reasons for the changes may be: the development of Internet technology, changes in generally applicable law or the development of the Website through, for example, the use of new tools by the Administrator. At the bottom of the page you will find the date of publication of the current Privacy Policy.

§2 DEFINITIONS

Administrator – Cleansery Sp. z o. o. with its registered office in 30-554 Kraków, ul. Closed 10/1.5, entered into the Register of Entrepreneurs of the National Court Register under the KRS number: 0000988474 NIP 6793246399, REGON 522889239, share capital in the amount of PLN 10,000, in accordance with the information corresponding to the current excerpt from the Register of Entrepreneurs contained in the Central Information of the National Court Register,

represented by Andrzej Suwara – President of the Management Board,

User – any entity staying on the website and using it.

Website and/or Online Store – website and blog located at www.cleansery.com and www.cleansery.com/blog

Form or Forms - places on the Website that enable the User to enter personal data for the purposes indicated therein, e.g. to send a newsletter, to place an order, to contact the User or the Administrator.

Regulations - regulations available on the website, which define the rules related to subscribing to the Newsletter and implementing the Newsletter Service.

Newsletter - means a free service provided electronically, digital service, by the Administrator to the User by sending electronic letters through which the Administrator informs about events, services, products and other elements important from the Administrator's point of view and / or in order to achieve a legally justified purpose The Administrator, which is direct marketing, including sending marketing and commercial content with the User's consent. Detailed information on sending the Newsletter can be found later in this privacy policy and in **the Newsletter Regulations (www.cleansery.com/newsletter-policy)**.

GDPR - means 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).

Personal Data Protection Act - Act of May 10, 2018 on the protection of personal data (Journal of Laws of 2018, item 1000, as amended).

Act on the provision of services by electronic means - Act of 18 July 2002 on the provision of services by electronic means (Journal of Laws of 2020, item 344, as amended).

Telecommunications Law - Act of July 16, 2004, Telecommunications Law (Journal of Laws of 2021, item 576). as of late d.).

§3 PERSONAL DATA AND THEIR PROCESSING RULES

WHO IS THE CONTROLLER OF THE USER'S PERSONAL DATA?

The administrator of the User's personal data is Cleansery Sp. z o. o. with its registered office in 30-554 Kraków, ul. Closed 10/1.5, entered into the Register of Entrepreneurs of the National Court Register under the KRS number: 0000988474 NIP 6793246399, REGON 522889239, share capital in the amount of PLN 10,000, in accordance with the information corresponding to the current excerpt from the Register of Entrepreneurs contained in the Central Information of the National Court Register, representative owed by Andrzej Suwara – President of the Management Board,

The Administrator co-administers with social media platform providers, e.g. Facebook, TikTok, etc. indicated in this document, regarding the data of people using social media and following the Administrator's profile on a given social media platform and interacting with the Administrator. The rules of co-administration are indicated below for each social media platform on which the Administrator has a profile.

IS PROVIDING DATA VOLUNTARY? WHAT IS THE CONSEQUENCE OF NOT PROVIDING THEM?

Providing data is voluntary, however, failure to provide certain information, generally marked as mandatory on the Administrator's website, will result in the inability to provide a given service and achieve a specific goal or take specific actions.

The User's provision of data that is not mandatory or excess data that the Administrator does not need to process is based on the User's own decision and then processing is based on the premise set out in Art. 6 section 1 letter a GDPR (consent). The User consents to the processing of this data and to anonymize data that the Administrator does not require and does not want to process, but the User nevertheless provided it to the Administrator.

FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS DO WE PROCESS THE USER'S PERSONAL DATA PROVIDED WHILE USING THE WEBSITE?

The User's personal data on the Administrator's Website may be processed for the following purposes and on the following legal bases:

No	Purpose of data processing	Legal basis for processing	Processing time
1.	performance of a service or performance of a concluded contract, sending an offer (e.g. advertising) at the User's request	art. 6 section 1 letter b GDPR (necessity to conclude and/or perform a contract or take action upon request)	data is processed for the duration of the contract / time necessary to send the offer and the User's response, and then the time until the limitation period for claims expires 2 years or 6 years from the execution of the contract depending on whether the User is an entrepreneur
2.	issuing an invoice, bill and fulfilling other obligations arising from tax law in the event of placing orders in the Online Store or other products and services	art. 6 section 1 letter c GDPR (obligation arising from legal provisions)	data is processed for 5 years from the end of the tax year in which the tax event occurred
3.	granting a discount or informing about promotions and interesting offers of the Administrator or entities	art. 6 section 1 letter a GDPR (consent)	data is processed until consent is withdrawn, then for a period of 4 years in the case of persons who

	recommended by him, including sending a newsletter		have withdrawn consent or after a period of 24 months of no activity of the recipient
4.	storing unpaid orders	art. 6 section 1 letter f) GDPR (legitimate interest of the administrator)	data is processed until it becomes useless 14 days from placing the order
5.	consideration of complaints or claims related to the contract	art. 6 section 1 letter b GDPR (necessity to conclude and/or perform the contract) and pursuant to Art. 6 section 1 letter c GDPR (obligation arising from legal provisions)	data is processed for the duration of the procedure or claim 1 year from the expiry of the claim processing deadline or 5 years from the end of the tax year in the scope of data stored under tax regulations
6.	determination, investigation or defense against claims	art. 6 section 1 letter f) GDPR (legitimate interest of the administrator)	data is processed until the basis for processing no longer exists 2 years or 6 years from the execution of the contract depending on whether the User is an entrepreneur
7.	telephone contact in matters related to the provision of the service or contract	art. 6 section 1 letter b GDPR (necessity to conclude and/or perform the contract)	data is processed for the duration of the contract / time necessary to send the offer and the User's response, and then the

			<p>time until the limitation period for claims expires</p> <p>2 years or 6 years from the execution of the contract depending on whether the User is an entrepreneur</p>
8.	telephone contact to present the offer and direct marketing	art. 6 section 1 letter a GDPR (consent)	data is processed until consent is withdrawn
9.	creating registers related to GDPR and other regulations	art. 6 section 1 letter c GDPR (obligation arising from legal provisions) and Art. 6 section 1 letter f GDPR (legitimate interest of the administrator)	the data is processed until the basis for processing ceases to exist or becomes no longer useful to the administrator
10.	archiving for the purpose of securing information that may be used to prove facts	art. 6 section 1 letter f GDPR (legitimate interest of the administrator)	<p>the data is processed until an objection is raised or it becomes no longer useful to the administrator</p> <p>2 years or 6 years from the execution of the contract depending on whether the User is an entrepreneur</p>
11.	analytical purpose, including the analysis of data collected automatically when using the website, including cookies, e.g. Google Analytics or Meta Pixel cookies	art. 6 section 1 letter f GDPR (legitimate interest of the administrator)	the data is processed until the User deletes cookies from the browser
12.	use of cookies on the Website and its subpages	art. 6 section 1 letter a GDPR (consent)	the data is processed until the User deletes cookies from the browser
13.	managing the Website and the Administrator's pages on other platforms	art. 6 section 1 letter f GDPR (legitimate interest of the administrator)	the data is processed until an objection is raised or the

			data becomes no longer useful to the administrator
14.	satisfaction survey with the services offered	art. 6 section 1 letter f GDPR (legitimate interest of the administrator)	the data is processed until an objection is raised or the data becomes no longer useful to the administrator
15.	posting by the User an opinion about the services provided by the Administrator	art. 6 section 1 letter a GDPR (consent)	the data is processed until the consent is withdrawn or it becomes no longer useful to the administrator, unless the consent is withdrawn earlier
16.	internal administrative purposes of the Administrator related to managing contact with the User	6 section 1 letter f GDPR (legitimate interest of the administrator)	data is processed until the basis for processing no longer exists 2 years or 6 years from the execution of the contract depending on whether the User is an entrepreneur
17.	adapting the content displayed on the Administrator's websites to individual needs and continuous improvement of the quality of the services offered	art. 6 section 1 letter f GDPR (legitimate interest of the administrator)	the data is processed until an objection is raised or the data becomes no longer useful to the administrator
18.	direct marketing directed to the User of products or Services or recommended third parties	art. 6 section 1 letter f GDPR (legitimate interest of the administrator)	the data is processed until an objection is raised or the data becomes no longer useful to the administrator
19.	managing the Facebook fanpage and interacting with users	art. 6 section 1 letter f GDPR (legitimate interest of the administrator) and art. 6 section 1 letter a GDPR (consent)	the data is processed until consent is withdrawn or an objection is raised or the data is no longer useful to the administrator

20.	managing a profile on the Instagram platform and interacting with users	art. 6 section 1 letter f GDPR (legitimate interest of the administrator) and art. 6 section 1 letter a GDPR (consent)	the data is processed until consent is withdrawn or an objection is raised or the data is no longer useful to the administrator
21.	managing a profile on the LinkedIn platform and interacting with users	art. 6 section 1 letter f GDPR (legitimate interest of the administrator) and art. 6 section 1 letter a GDPR (consent)	the data is processed until consent is withdrawn or an objection is raised or the data is no longer useful to the administrator
22.	managing a profile on the Twitter platform and interacting with users	art. 6 section 1 letter f GDPR (legitimate interest of the administrator) and art. 6 section 1 letter a GDPR (consent)	the data is processed until consent is withdrawn or an objection is raised or the data is no longer useful to the administrator
23.	managing a profile on the YouTube platform and interacting with users	art. 6 section 1 letter f GDPR (legitimate interest of the administrator) and art. 6 section 1 letter a GDPR (consent)	the data is processed until consent is withdrawn or an objection is raised or the data is no longer useful to the administrator
24.	managing a profile on the TikTok platform and interacting with users	art. 6 section 1 letter f GDPR (legitimate interest of the administrator) and art. 6 section 1 letter a GDPR (consent)	the data is processed until consent is withdrawn or an objection is raised or the data is no longer useful to the administrator
25.	targeting advertising on social media and websites, the type of ads created using Facebook Ads Manager, and remarketing targeting	art. 6 section 1 letter a GDPR (consent) and pursuant to Art. 6 section 1 letter f GDPR (legitimate interest of the administrator) consisting in the promotion and advertising of the Administrator's services through remarketing directed to people registered for mailings or visiting a given website)	the data is processed until consent is withdrawn or an objection is raised or the data is no longer useful to the administrator

26.	contact with the Administrator using a chatbot	art. 6 section 1 letter a GDPR (consent) or art. 6 section 1 letter b GDPR (consent), data is processed in order to answer the website user's question	the data is processed until consent is withdrawn or an objection is raised or the data is no longer useful to the administrator
27.	posting comments by the User	art. 6 section 1 letter a GDPR (consent)	the data is processed until consent is withdrawn or it becomes no longer useful to the administrator
28.	posting an opinion by the User	art. 6 section 1 letter a GDPR (consent)	the data is processed until consent is withdrawn or it becomes no longer useful to the administrator
29.	conducting recruitment	<p>for the purpose and for the time necessary to take steps necessary before concluding the contract - Art. 6 section 1 letter b GDPR, and up to 6 months after the end of recruitment, and in the case of data provided voluntarily by the candidate or redundant data - pursuant to Art. 6 section 1 letter a GDPR (consent), and Art. 9 section 2 letter a GDPR (consent) - in the case of sensitive data provided by the candidate,</p> <p>for the purposes of future recruitment - based on your consent pursuant to Art. 6 section 1 letter a GDPR,</p> <p>for the purpose and for the period necessary to</p>	<p>Until the contract is concluded or consent is withdrawn.</p> <p>No longer than 6 months from the end of recruitment.</p> <p>For a maximum period of 1 year (this period is counted from the end of the year in which the data was obtained)</p>

		pursue legally justified interests pursued by the Administrator, e.g. pursuing claims and defending against claims, marketing own products and services (to the extent that processing is necessary for this purpose) - pursuant to Art. 6 section 1 letter f GDPR.	Until an objection is filed.
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The User's provision of data that is not mandatory or excess data that the Administrator does not need to process is based on the User's own decision and then processing is based on the premise set out in Art. 6 section 1 letter a GDPR (consent). The User consents to the processing of this data and to anonymize data that the Administrator does not require and does not want to process, but the User nevertheless provided it to the Administrator.

HOW IS DATA COLLECTED?

Only data that the user provides is collected and processed (except - in certain situations - data collected automatically using cookies .

During a visit to the website, data regarding the visit itself is automatically collected, e.g. the user's IP address, domain name, browser type, operating system type, etc. (login data). Data collected automatically may be used to analyze user behavior on the website, collect demographic data about users or to personalize the website content in order to improve it. However, this data is processed only for the purposes of administering the website, ensuring efficient hosting service, or directing marketing content and is not associated with the data of individual users. You can read more about cookies later in this policy.

Data may also be collected for the purpose of completing forms available on the Website, as described further in the privacy policy.

Information society services

The administrator does not collect children's data. The user must be at least 16 years old to consent to the processing of personal data for the purpose of providing information society services, including: for marketing purposes, or obtain the consent of a legal guardian (e.g. parent) for this purpose.

If the User is under 16 years of age, he or she should not use the Website and the website www.cleansery.com.

The Administrator is entitled to make reasonable efforts to verify whether the User meets the age requirement referred to above, or whether the person exercising parental authority or care over the User who is under 16 years of age has consented or approved it.

WHAT ARE YOUR USER RIGHTS?

The user has the rights specified in Art. 15-21 GDPR, i.e.:

- the right to access the content of his data,
- the right to transfer data,
- the right to correct data,
- the right to rectify data,
- the right to delete data if there are no grounds for processing it,

- the right to limit processing if it was carried out incorrectly or without a legal basis,
- the right to object to data processing based on the legitimate interest of the administrator,
- the right to lodge a complaint with the supervisory authority - the President of the Office for Personal Data Protection (pursuant to the principles set out in the Personal Data Protection Act), if he considers that the processing of his data is inconsistent with the currently applicable data protection provisions.
- the right to be forgotten if further processing is not provided for by currently applicable law.

The Administrator points out that these rights are not absolute and do not apply to all processing activities of the User's personal data. This applies, for example, to the right to obtain a copy of your data. This right may not adversely affect the rights and freedoms of other persons, such as copyrights or professional secrecy. To learn about the limitations regarding User rights, please refer to the GDPR.

However, the user always has the right to lodge a complaint with the supervisory authority.

In order to exercise their rights, the User may contact the Administrator via e-mail: info@cleansery.com or by letter to the address of the Administrator's place of business, if provided in this privacy policy, indicating the scope of your requests. The response will be provided no later than 30 days from the date of receipt of the request and its justification, unless it is justified to extend this deadline in accordance with the GDPR.

CAN A USER WITHDRAW HIS EXPRESS CONSENT?

If the User has consented to a specific action, such consent may be withdrawn at any time, which will result in the removal of the e-mail address from the Administrator's mailing list and the cessation of the indicated activities (in the case of registration based on consent). Withdrawal of consent does not affect the processing of data that was carried out on the basis of consent before its withdrawal.

In some cases, the data may not be completely deleted and will be retained in order to defend against possible claims for a period of time in accordance with the provisions of the Civil Code or, for example, in order to fulfill legal obligations imposed on the Administrator.

Each time, the Administrator will respond to the User's request, adequately justifying further actions resulting from legal obligations.

DO WE TRANSFER YOUR DATA TO THIRD COUNTRIES?

User data may be transferred outside the European Union - to third countries.

Due to the fact that the Administrator uses external suppliers of various services, e.g. Meta Platforms Ireland Limited (Facebook and subsidiaries) hereinafter referred to as Meta or Facebook, Google, Microsoft, Airtable, Notion, Basecamp, etc., the User's data may be transferred to the United States America (USA) in connection with their storage on American servers (in whole or in part) as well as in other countries . Google and Facebook apply compliance mechanisms provided for by the GDPR (e.g. certificates) or standard contractual clauses for their services. They will be transferred only to recipients who guarantee the highest data protection and security, including: by:

- a) cooperation with entities processing personal data in countries for which an appropriate decision of the European Commission has been issued,
- b) application of standard contractual clauses issued by the European Commission (as is the case, for example, with Google),
- c) application of binding corporate rules approved by the competent supervisory authority,

or those to which the User has consented to the transfer of personal data.

Detailed information is available in the privacy policy of each provider of these services, available on their websites. For example:

Google Ireland Limited : <https://policies.google.com/privacy?hl=pl>

Meta Platforms Ireland Limited: <https://www.facebook.com/privacy/explanation>

Getresponse : <https://www.getresponse.pl/informacje-prawne/polityka-prywatnosci>

Notion: <https://www.notion.so/Privacy-Policy-3468d120cf614d4c9014c09f6adc9091>

Airtable: <https://www.airtable.com/company/privacy>

Basecamp: <https://basecamp.com/about/policies/privacy>

Currently, the services offered by Google Ireland Limited and Meta Platforms Ireland Limited are mainly provided by entities located in the European Union. However, you should always read the privacy policies of these providers to obtain up-to-date information on personal data protection. MailerLite may store some data in the United States or use service providers from that country, but the data is mainly processed in the European Union.

HOW LONG DO WE KEEP YOUR DATA?

The User's data will be stored by the Administrator for the duration of the implementation of individual services/achieving the goals indicated in the table above, and:

- a) for the period of service and cooperation, as well as for the period of limitation of claims in accordance with legal provisions - in relation to data provided by contractors, customers or Users,
- b) for the period of talks and negotiations preceding the conclusion of the contract or provision of the service - in relation to the data provided in the request for quotation,
- c) for the period required by law, including tax law - in relation to personal data related to the fulfillment of obligations arising from applicable regulations,
- d) until an objection is effectively filed pursuant to Art. 21 GDPR - in relation to personal data processed on the basis of the legitimate interest of the administrator, including for direct marketing purposes,
- e) until consent is withdrawn or the purpose of processing or business purpose is achieved - in relation to personal data processed on the basis of consent. After withdrawing consent, the data may still be processed in order to defend against possible claims in accordance with the limitation period for these claims or the (shorter) period indicated to the User,
- f) until it becomes obsolete or becomes unusable - in relation to personal data processed mainly for analytical and statistical purposes, the use of cookies and the administration of the Administrator's Websites,
- g) for a maximum period of 3 years in the case of people who have unsubscribed from the newsletter in order to defend themselves against possible claims (e.g. information about the date of subscription and the date of unsubscribing from the newsletter, the number of newsletters received, actions taken and activity

related to the received messages), or after a period of 3 years of inactivity by a given subscriber, e.g. not opening any message from the Administrator.

Data storage periods indicated in years are counted at the end of each year in which data processing began. This is intended to improve the data processing and management process.

Detailed personal data processing periods regarding individual processing activities are included in the Administrator's register of processing activities.

LINKS TO OTHER SITES

The Site may contain links to other websites. They will open in a new browser window or in the same window. The administrator is not responsible for the content transmitted by these websites. The user is obliged to read the privacy policy or regulations of these websites.

ACTIVITIES IN SOCIAL MEDIA – FACEBOOK

The Administrator administers the User's data on the fanpage called Cleansery on Facebook (hereinafter referred to as the Fanpage).

The User's personal data provided on the Fanpage will be processed for the purpose of administering and managing the Fanpage, communicating with the User, interacting, directing marketing content to the User and creating the Fanpage community.

The basis for their processing is the User's consent and the legitimate interest of the administrator consisting in interacting with Users and Followers of the Fanpage. The user voluntarily decides to like/follow the Fanpage.

The rules governing the Fanpage are set by the Administrator, however, the rules for staying on the Facebook social networking site result from Facebook's regulations.

The User may unfollow the Fanpage at any time. However, the Administrator will not then display to the User any content from the Administrator related to the Fanpage.

The Administrator sees the User's personal data, such as name, surname or general information, which the User places on their profiles as public. The processing of other personal data is carried out by the Facebook social networking site and under the terms and conditions contained in its regulations.

The User's personal data will be processed for the period of operation/existence of the Fanpage based on the consent expressed by liking/clicking "Follow" the Fanpage or interacting, e.g. leaving a comment, sending a message, and in order to implement the legally justified interests of the Administrator, i.e. marketing its own products or services or defense against claims.

The User's personal data may be made available to other data recipients, such as Facebook, cooperating advertising agencies or other subcontractors operating the Administrator's Fanpage, an IT service, a virtual assistant, if contact occurs outside Facebook.

The User's other rights are described in this Privacy Policy.

User data may be transferred to third countries in accordance with Facebook's regulations.

This data may also be profiled, which helps to better personalize the advertising offer addressed to the User. However, they will not be processed in an automated manner within the meaning of the GDPR (having a negative impact on the User's rights and freedoms).

Facebook privacy policy:

<https://www.facebook.com/privacy/explanation> .

ACTIVITIES IN SOCIAL MEDIA – INSTAGRAM

The Administrator administers the User's data on the profile page under the name @cleansery_ available at the URL: www.instagram.com/cleansery_ on Instagram (hereinafter referred to as Profile).

The User's personal data provided on the Profile will be processed for the purpose of administering and managing the Profile, communicating with the User, interacting, directing marketing content to the User and creating a Profile community.

The basis for their processing is the User's consent and the legitimate interest of the administrator consisting in interacting with Users and Profile Followers. The User voluntarily decides to like/follow the Profile.

The rules governing the Profile are set by the Administrator, however, the rules for staying on the Instagram social networking site result from the Instagram regulations.

The User may unfollow the Profile at any time. However, the Administrator will not then display to the User any content from the Administrator related to the Profile.

The Administrator sees the User's personal data, such as name, surname or general information, which the User places on their profiles as public. The processing of other personal data is carried out by the social networking site Instagram and under the conditions contained in its regulations.

The User's personal data will be processed for the period of maintaining/existence of the Profile based on the consent expressed by liking/clicking "Follow" the Profile or interacting, e.g. leaving a comment, sending a message, and in order to implement the legally justified interests of the Administrator, i.e. marketing its own products or services or defense against claims.

The User's personal data may be made available to other data recipients, such as cooperating advertising agencies or other subcontractors servicing the Administrator's Profile, an IT service, a virtual assistant, if contact occurs outside Instagram.

The User's other rights are described in this Privacy Policy.

User data may be transferred to third countries in accordance with Instagram's regulations.

This data may also be profiled, which helps to better personalize the advertising offer addressed to the User. However, they will not be processed in an automated manner within the meaning of the GDPR (having a negative impact on the User's rights and freedoms).

Instagram privacy policy:

<https://help.instagram.com/519522125107875>

ACTIVITIES IN SOCIAL MEDIA - LINKEDIN

The Administrator administers the User's data on the profile page under the name Cleansery available at the URL: <https://www.linkedin.com/company/65461676/> on LinkedIn (hereinafter referred to as Profile).

The User's personal data provided on the Profile will be processed for the purpose of administering and managing the Profile, communicating with the User, interacting, directing marketing content to the User and creating a Profile community.

The basis for their processing is the User's consent and the legitimate interest of the administrator consisting in interacting with Users and Profile Followers. The User voluntarily decides to like/follow the Profile.

The rules governing the Profile are set by the Administrator, however, the rules for staying on the LinkedIn social networking site result from LinkedIn's regulations.

The User may unfollow the Profile at any time. However, the Administrator will not then display to the User any content from the Administrator related to the Profile.

The Administrator sees the User's personal data, such as name, surname or general information, which the User places on their profiles as public. The processing of other personal data is carried out by the LinkedIn social networking site and under the terms and conditions contained in its regulations.

The User's personal data will be processed for the period of maintaining/existence of the Profile based on the consent expressed by liking/clicking "Follow" the Profile or interacting, e.g. leaving a comment, sending a message, and in order to implement the legally justified interests of the Administrator, i.e. marketing its own products or services or defense against claims.

The User's personal data may be made available to other data recipients, such as the LinkedIn portal, cooperating advertising agencies or other subcontractors servicing the Administrator's Profile, an IT service, a virtual assistant, if contact occurs outside the LinkedIn portal.

The User's other rights are described in this Privacy Policy.

User data may be transferred to third countries in accordance with LinkedIn's regulations.

This data may also be profiled, which helps to better personalize the advertising offer addressed to the User. However, they will not be processed in an automated manner within the meaning of the GDPR (having a negative impact on the User's rights and freedoms).

LinkedIn privacy policy:

<https://pl.linkedin.com/legal/privacy-policy>

DATA SAFETY

The User's personal data is stored and protected with due care, in accordance with the Administrator's implemented internal procedures. The Administrator processes information about the User using appropriate technical and organizational measures that meet the requirements of generally applicable law, in particular the provisions on the protection of personal data. These measures are primarily intended to protect Users' personal data against access by unauthorized persons.

In particular, access to Users' personal data is available only to authorized persons who are obliged to keep this data secret or entities entrusted with the processing of personal data on the basis of a separate data entrustment agreement.

At the same time, the User should exercise due diligence in securing his/her personal data transmitted via the Internet, in particular not disclosing his/her login data to third parties, using anti-virus protection and updating the software.

WHO CAN THE RECIPIENTS OF PERSONAL DATA BE?

The Administrator informs that he uses the services of external entities. Entities entrusted with the processing of personal data (such as courier companies, companies intermediating in electronic payments, companies offering accounting services, companies enabling the sending of newsletters) guarantee the use of appropriate protection and security measures for personal data required by law, in particular by the GDPR.

The Administrator informs the User that he entrusts the processing of personal data, among others: the following entities:

1. Get response and SendGrid – to send the newsletter and use the mailing system
2. Google – to store personal data on the server,
3. Webflow – to create landing pages and collect leads,
4. ING Accounting – to issue accounting documents,
5. Notion – to manage the company,
6. Google – to use Google services, including e-mail,
7. OVH – for the purpose of servicing the domain
8. Webflow – for IT support or IT management of the Website,
9. other contractors or subcontractors engaged in technical and administrative support, or to provide legal assistance to the Administrator and its clients, e.g. accounting, IT, graphic, copywriting assistance, debt collection companies, lawyers, etc.

Personal data may also be made available to other recipients, including: offices, e.g. the tax office - in order to fulfill legal and tax obligations related to settlements and accounting.

Entities that process personal data , such as the Administrator, ensure compliance with European standards in the field of personal data protection, including standards set by legal acts and decisions of the European Commission, and apply compliance mechanisms also when transferring data outside the EEA, including: in the form of standard contractual clauses adopted by the European Commission, Decision 2021/915 of 4 June 2021 on standard contractual clauses between controllers and processors pursuant to Art. 28 section 7 of Regulation (EU) 2016/679 of the European Parliament and of the Council and Art. 29 section 7 of Regulation (EU) 2018/1725 of the European Parliament and of the Council

<https://eur-lex.europa.eu/legal-content/PL/TXT/PDF/?uri=CELEX:32021D0915&from=PL>.

HAVE WE APPOINTED A DATA PROTECTION OFFICER?

The Personal Data Administrator hereby informs that he has not appointed a Personal Data Protection Inspector (IODO) and performs the duties related to the processing of personal data on his own.

The User acknowledges that his or her personal data may be transferred to authorized state authorities in connection with the proceedings conducted by them, at their request and after meeting the conditions confirming the necessity of obtaining this data from the Administrator.

DO WE PROFILE USER DATA?

The User's personal data will not be used for automated decision-making that affects the User's rights, obligations or freedoms within the meaning of the GDPR.

As part of the website and tracking technologies, the User's data may be profiled, which helps to better personalize the company's offer that the Administrator addresses to the User (mainly through the so-called behavioral advertising). However, this should not have any impact on the User's legal situation, in particular on the terms of the contracts concluded by him or the contracts he intends to conclude. It can only help to better match content and targeted advertisements to the User's interests. The information used is anonymous and is not associated with personal data provided by the User, e.g. in the purchase process. They result from statistical data, e.g. gender, age, interests, approximate location, behavior on the Website.

Each User has the right to object to profiling if it would have a negative impact on the User's rights and obligations.

If you want to learn more about behavioral advertising, click here:
<https://www.youronlinechoices.com/pl/o-reklamie-behawioralna>

§4 FORMS

The Administrator uses the following types of forms on the Website:

1. **Newsletter subscription form** – requires providing your name and e-mail address in the appropriate place. These fields are mandatory. Then, in order to add his e-mail address to the Administrator's subscriber database, the User must confirm his willingness to subscribe. The data obtained in this way is added to the mailing list for sending the newsletter.

Subscription/registration means that the User agrees to this Privacy Policy and consents to sending him marketing and commercial information via electronic means of communication, e.g. e-mail, within the meaning of the Act of July 18, 2002 on the provision of electronic services (Journal of Laws .U. No. 144, item 1204, as amended).

By subscribing to the newsletter, the User also consents to the Administrator using the User's telecommunications end devices (e.g. telephone, tablet, computer) for the purpose of direct marketing of the Administrator's products and services and presenting commercial information to the User in accordance with Art. 172 section 1 of the Telecommunications Law (Journal of Laws of 2014, item 243, as amended)

The above consents are voluntary, but necessary to send the newsletter, including: to inform about services, new blog entries, products, promotions and discounts offered by the Administrator or third-party products recommended by him. Consents may be withdrawn at any time, which will result in the cessation of sending the newsletter in accordance with the principles contained in this privacy policy.

The newsletter is sent for an indefinite period of time, from the moment of activation until the consent is withdrawn. After withdrawing consent, the User's data may be stored in the newsletter database for a period of up to 4 years in order to prove the fact that the User has consented to communication via the newsletter, the User's activities (email openness) and the moment of its withdrawal, as well as any possible including claims, which constitutes the legitimate interest of the Administrator (Article 6(1)(f) of the GDPR).

The sending of the newsletter may be discontinued if the User is inactive for at least 6 months from the start of the newsletter service or from reading the last e-mail (sent newsletter). In such a case, the Administrator will delete the User's data from the newsletter sending system (supplier). The User will not be entitled to receive any messages from the Administrator unless he/she decides to subscribe again in the Newsletter subscription form or contacts the Administrator in another way chosen for this purpose.

The mailing system used to send the newsletter records all activity and actions taken by the User related to the e-mails sent to him (date and time of opening the message, clicking on links, the moment of unsubscribing, etc.).

The administrator may also conduct remarketing pursuant to Art. 6 section 1 letter f GDPR (legitimate interest of the administrator, consisting in the promotion and advertising of services addressed to people subscribed to the newsletter, in such a way that the e-mail addresses of subscribers are uploaded to the marketing tool offered by Meta Platforms Ireland Limited, the so-called

advertising manager, and then they are directed to an advertisement created by the Administrator or authorized persons, through the Administrator's advertising account, provided that the newsletter subscribers are also users of the Facebook platform (they have an account set up there). Each time, this data is deleted after the end of the advertising campaign. In the event of another advertising campaign, an updated database of subscribers is uploaded to the tool). Detailed information about the so-called groups of non-standard recipients, the rules for hashing data and processing this data can be found in the Facebook privacy policy at this link <https://www.facebook.com/legal/terms/customaudience#> and <https://www.facebook.com/legal/terms/dataprocessing>, and the Administrator recommends that each User and subscriber read these rules.

2. **Contact form** – allows you to send a message to the Administrator and contact him electronically. Personal data in the form of name, surname, e-mail address and data provided in the message are processed by the Administrator in accordance with this Privacy Policy in order to contact the User.

After completing contact with you, the data may be archived, which is the legitimate interest of the Administrator. The administrator is unable to determine the exact archiving period and therefore the deletion of messages. However, the maximum period will not be longer than the limitation periods for claims under the law.

The Administrator may entrust the processing of personal data to third parties without the User's separate consent (based on an entrustment agreement). Data obtained from the forms cannot be transferred to third parties.

If the User uses the services of external providers, such as Google or Disqus, he or she should read their privacy policies, available from the providers of these services, on their websites.

§5 EXCLUSION OF LIABILITY AND COPYRIGHTS

1. The content presented on the Website does not constitute advice or specialist advice (e.g. educational) and does not refer to a specific factual situation. If the User wants to get help in a specific matter, he or she should contact the person authorized to provide such advice or the Administrator using the provided contact details. The Administrator is not responsible for the use of the content contained on the Website or any actions or omissions taken on its basis.
2. All content posted on the Website is subject to the copyright of specific persons and/or the Administrator (e.g. photos, texts, other materials, etc.). The Administrator does not consent to copying this content in whole or in part without his express prior consent.
3. The Administrator hereby informs the User that any dissemination of content made available by the Administrator constitutes a violation of the law and may give rise to civil or criminal liability. The Administrator may also demand appropriate compensation for material or intangible losses in accordance with applicable regulations.
4. The Administrator is not responsible for the use of materials available on the website in an unlawful manner.
5. The content posted on the Site is current as of the date of posting, unless otherwise indicated.

§6 TECHNOLOGIES

In order to use the Administrator's website, it is necessary to have:

- a) Devices with access to the Internet,
- b) An active e-mail box receiving e-mails,

- c) A web browser that allows you to display websites,
- d) Software that allows reading content in the following formats, e.g. pdf, video, mp3, mp4.

§7 COOKIES POLICY

1. Like most websites, the Administrator's Page uses the so-called tracking technologies, i.e. cookies, which allows the Website to be improved to meet the needs of its visitors.
2. The website does not automatically collect any information, except for information contained in cookies.
3. Cookies (so-called "cookies") are IT data, small text files that are stored on the end device, e.g. computer, tablet, smartphone, when you use the Website.
4. These may be own cookies (coming directly from the Website) and third-party cookies (coming from websites other than the Website).
5. Cookies allow me to adapt the content of my website to the individual needs of the User and the needs of other users visiting it. They also enable the creation of statistics that show how users of the Website use it and how they move around it. This allows me to improve my website, its content, structure and appearance.
6. The Administrator uses the following third-party cookies on the Website:
 - a) **Facebook conversion pixel and ads created via the Facebook Facebook Ads portal (Facebook Custom Audiences)** - in order to manage Facebook ads and conduct remarketing activities, which is the legitimate interest of the

Administrator. The Administrator may also direct advertising content to the User via Facebook as part of contact advertising.

The Facebook Pixel tool is provided by Meta Platforms Ireland Limited. and its affiliates. This is an analytical tool that helps measure the effectiveness of advertising, shows what actions the Website Users take and helps reach a specific group of people (Facebook Ads, Facebook Insights). The Administrator may also direct advertising content to the User via Facebook as part of contact advertising.

The administrator may also conduct remarketing pursuant to Art. 6 section 1 letter f GDPR (legitimate interest of the administrator, consisting in the promotion and advertising of services addressed to people who have consented to sending offers (or people similar to them or to users who liked the Fanpage) in such a way that the e-mail addresses provided are uploaded to the marketing tool offered by Meta Platforms Ireland Limited, the so-called advertising manager, and then an advertisement created by the Administrator or authorized persons is directed to them, through the Administrator's advertising account, provided that these persons are also users of the Facebook platform (they have an account set up there). Each time, this data is deleted after the end of the advertising campaign. In the event of another advertising campaign, an updated contact database is uploaded to the tool). Detailed information about the so-called groups of non-standard recipients, the rules for hashing data and processing this data can be found in the Facebook privacy policy at this link <https://www.facebook.com/legal/terms/customaudience#> and <https://www.facebook.com/legal/terms/dataprocessing>, and the Administrator recommends that each User read these rules.

The information collected as part of the use of the Facebook Pixel is anonymous and does not allow identification of the User. They show general data about users: location, age, gender, interests. The Facebook provider may combine this information with the information that the User provides to him as part of his

Facebook account and then use it in accordance with his own assumptions and purposes.

The Administrator recommends that you read the details related to the use of the Pixel Meta (Facebook) tool and, if necessary, ask questions to the provider of this tool, as well as manage your privacy settings on Facebook. More information can be found at the link: <https://www.facebook.com/privacy/explanation> and https://www.facebook.com/business/help/742478679120153?id=1205376682832142&_ga=2.140230195.1899084027.1676390445-251481724.1675757116 . You can opt out of cookies responsible for displaying remarketing ads at any time, e.g. at <https://www.facebook.com/help/1075880512458213/>.

By using the website, the user consents to the installation of the indicated cookie on his/her end device.

- b) **Embedded Google Analytics code** - to analyze Website statistics. Google Analytics uses its own cookies to analyze the activities and behaviors of Website Users. These files are used to store information, e.g. from which website the User came to the current website. They help improve the Site.

This tool is used under an agreement concluded with Google Ireland Limited and is provided by Google LLC. Actions taken as part of the use of the Google Analytics code are based on the Administrator's legitimate interest in creating and using statistics, which then enables the improvement of the Administrator's services and optimization of the Website.

As part of the use of the Google Analytics tool, the Administrator does not process any User data enabling his/her identification.

The administrator recommends that you read the details related to the use of the Google Analytics tool, the possibility of disabling the tracking code and, if necessary, ask questions to the provider of this tool at the link: <https://support.google.com/analytics#topic=3544906> or read the privacy policy at

the

link:

https://policies.google.com/privacy?hl=pl&_ga=2.64139695.1899084027.1676390445-251481724.1675757116.

- c) **Plugins directing to social media**, e.g. Facebook, Instagram, TikTok, LinkedIn.

After clicking on the icon of a given plug-in, the user is redirected to the website of an external provider, in this case the owner of a given social networking site, e.g. Facebook. Then, you can click "Like" or "Share" and like the Administrator's fanpage on Facebook or directly share its content (post, article, video, etc.).

The administrator recommends reading Facebook's privacy policy before creating an account on this website. The administrator has no influence on the data processed by Facebook. From the moment the User clicks on the plug-in button linking to social media, personal data is processed by a social networking site, e.g. Facebook, which becomes their administrator and decides on the purposes and scope of their processing. Cookies left by the Facebook plug-in (or other third parties) may also be placed on the User's device after entering the Website and then associated with data collected on Facebook. By using the Website, the User accepts this fact. The administrator has no influence on the processing of data by third parties in this way.

The above instructions also apply to the operation of:

Facebook – fanpage located at the URL: <https://www.facebook.com/cleansery> ,

Profile on the social networking site Instagram, located at the URL: www.instagram.com/cleansery_ ,

- d) **Tools used to assess the effectiveness of Google Ads advertising campaigns** - in order to conduct advertising and remarketing campaigns, which is the legitimate interest of the Administrator.

The Administrator does not collect any data that would allow the identification of the User's personal data. The Administrator recommends reading Google's privacy policy to learn the details of how these functions work and how to disable them from the User's browser.

e) Cookies used to recover abandoned baskets and User activity on the online store website,

- in order to send advertising communications to the User related to an unfinished order, which is the legitimate interest of the Administrator.

f) Content from portals and websites of external providers,

The Administrator may embed content from portals, websites, blogs and other websites of external entities on the Website. In particular, these may be videos from You Tube or Vimeo and sound recordings on SoundCloud.

These third parties may record certain data about the content played by the User.

If you do not want this to happen, log out of the given portal (if you have an account there and are logged in) before visiting my Website or do not play the content on the Website. You can also change your browser settings and block specific content from specific websites from being displayed to you.

By playing recordings available on the SoundCloud portal, you use the services provided by SoundCloud, which is an independent entity providing electronic services to the User. Details regarding the processing of personal data by SoundCloud can be found in the privacy policy of this website: <https://soundcloud.com/pages/privacy> and cookie policy: <https://soundcloud.com/pages/cookies>, as well as the regulations: <https://soundcloud.com/terms-of-use>.

g) Affiliate links and affiliate programs

The Administrator's Website may contain affiliate links to specific products or services of third parties. This is a way of monetizing content available on the Website, which is generally available free of charge. Clicking on the link will not result in any fees being charged to the User. If you go to an external entity's website by clicking on an affiliate link and purchase a product, I may receive a commission. By using the Website, you agree to the use of cookies in this regard.

Advertising windows with third-party products may also appear on the Website, as part of the so-called Google AdSense. The Administrator informs that he has no influence on the content of these advertisements or their appearance, which are determined by the provider's algorithm, in this case Google Ireland Limited. You can modify advertising settings and personalization directly from your browser by going to: <https://adssettings.google.com/authenticated>.

7. The Administrator again recommends reading the privacy policy of each provider of the above services in order to learn about the possibilities of making changes and settings that ensure the protection of the User's rights.
8. The website uses two types of cookies: session cookies, which are deleted after closing the browser, logging out or leaving the website, and persistent cookies, which are stored on the user's end device, which allows the browser to be recognized the next time you visit the website, for the period specified in cookie parameters or until they are deleted by the User.
9. In many cases, the software used to browse websites (web browser) allows cookies to be stored on the User's end device by default. Website users may change cookie settings at any time. These settings can be changed in particular in such a way as to block the automatic handling of cookies in the web browser settings or to inform each time they are placed on the Website User's device. Detailed information about the possibilities and methods of handling cookies is available in the software (web browser) settings.

10. The Administrator informs that restrictions on the use of cookies (disabling them, limiting them) may affect some of the functionalities available on the Website's websites and impede its functioning.
11. More information about cookies is available at <http://wszystkoociasteczkach.pl/> or in the "Help" section in the web browser menu.

§8 CONSENT TO COOKIES

When you first access the Site you must consent to cookies or take other possible actions indicated in the message in order to continue using the content of the Website. By using the Site, you consent. If you do not want to give such consent, leave the Website. You can always change your browser settings, disable or delete cookies. The "help" tab in the User's browser contains the necessary information.

§9 SERVER LOGS

1. Using the Website involves sending queries to the server on which the Website is stored.
2. Each query sent to the server is saved in the server logs. Logs include, among others: the User's IP address, server date and time, information about the web browser and operating system used by the User.
3. Logs are saved and stored on the server.
4. Server logs are used to administer the Website, and their content is not disclosed to anyone other than persons and entities authorized to administer the server.

5. The Administrator does not use server logs in any way to identify the User.

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