

PRIVACY POLICY

The Privacy Policy is for information purposes and serves satisfaction of the disclosure requirements imposed on the data controller under the GDPR, i.e. Regulation (EU) 2016/679 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).

Anyone who uses <https://ihateseo.com/> Platform should become acquainted with the Privacy Policy. The Privacy Policy determines the rules for processing the personal data of persons using the Platform and using cookie files used in connection with the Platform operation.

1. PERSONAL DATA CONTROLLER

- 1.1 The controller of personal data is Grupa KBR Chlewiński & Kozłowski Group S.K.A. with its registered office in Katowice (40-008), ul. Warszawska 40/2A, entered in the register of entrepreneurs of the National Court Register (KRS) under number KRS: 0000940617, Tax Identification Number NIP: 6342871729, National Business Registry Number REGON: 3653108120 ("Service Provider").
- 1.2 The data subject, including in particular the user of the ihateseo.com platform, may contact the Service Provider as the personal data controller by sending a message to the e-mail address: bok@linkhouse.co.

2. DATA PROCESSING METHOD

- 2.1. The Service Provider may process, in particular, the following categories of personal data: i) e-mail address; ii) IP address.
- 2.2. The Service Provider may process the personal data of the following categories of data subjects: the users of the ihateseo.com Platform.
- 2.3. Providing personal data is voluntary but failure to provide the personal data will result in inability to send the newsletter.
- 2.4. Personal data of the users will be processed for the following purposes:

purpose	scope of data	legal basis	processing period
providing access to the Platform	IP address	article 6(1)(b) of the GDPR – processing is necessary for the performance of the agreement to which the data subject is a party or undertaking actions upon request of the data subject prior to the conclusion of the agreement	until the lapse of the period of limitation of claims connected with making the ihateseo.com Platform available to the data subject
sending newsletter, including marketing content	e-mail address	article 6(1)(f) of the GDPR – legitimate interest of the Service Provider as the data controller that consists in informing about its current activities and sending marketing content in accordance with a consent given by the data subject	until the data cease to be useful or the user objects/withdraw the consent regarding the newsletter

- 2.5. If the Service Provider is advised that the relevant person uses the services or the ihateseo.com Platform functionalities in violation of generally applicable legal provisions, then the Service Provider may process the user's personal data in a scope required for establishing his/her liability and seeking claims against that user.
- 2.6. The Service Provider does not transfer the users' personal data to third countries, that, is beyond the European Economic Area.

- 2.7. The Service Provider does not carry out automated decision-making based on the processed personal data. The user may be subject to profiling to enable presenting him/her with a dedicated marketing offer. The user may file a complaint to the extent to which he/she is subject to profiling.

3. RECIPIENTS OF DATA

- 3.1. The Service Provider may entrust the processing of personal data to third parties for the purpose of performing the activities indicated in the Terms and Conditions. The recipients of the data of the persons mentioned in the preceding sentence may involve in particular: the provider of hosting for the ihateseo.com platform, e-mail operator, entities providing cloud, newsletter functions and other solutions used by the Service Provider in its current operations that involve personal data processing.
- 3.2. The personal data collected by the Service Provider may also be disclosed to competent state bodies or institutions (law enforcement authorities, courts, security service) authorised to gain access to them on the basis of generally applicable legal provisions, or other persons and entities – in the cases prescribed by generally applicable legal provisions.
- 3.3. Each entity to which the Service Provider transfers personal data for processing on the basis of a personal data transfer agreement (“Data Transfer Agreement”) guarantees an adequate level of security and confidentiality of the processing of personal data. An entity processing personal data on the basis of the Data Transfer Agreement may process personal data through another entity only upon prior consent of the Service Provider.
- 3.4. Personal data may be disclosed to unauthorised entities under the Privacy Policy only upon prior written consent of the data subject.

4. RIGHTS OF DATA SUBJECT

- 4.1. Each data subject has the right to (a) delete the collected personal data referring to him/her both from the system belonging to the Service Provider as well as from bases of entities that have co-operated with the Service Provider, (b) restrict the processing of data, (c) portability of the personal data collected by the Service Provider and referring to the relevant person, in this to receive them in a structured form, (d) request the Service Provider to enable him/her access to his/her personal data and to rectify them, (e) object to personal data processing, (f) withdraw the consent towards the Service Provider at any time without affecting the legality of the personal data processing carried out on the basis of the consent before it is withdrawn, (g) lodge a complaint about the Service Provider to the supervisory authority (President of the Personal Data Protection Office).
- 4.2. All rights of the data subjects can be executed via e-mail address: bok@linkhouse.co.

5. OTHER DATA

- 5.1. The Service Provider may store http enquiries, therefore the files containing web server logs may store certain data related to the users, including the name of the user’s station – identification through http protocol, date and system time of receipt of the enquiry, number of bytes sent by the server, the URL address of the site visited by the user before (if the user entered the platform through a link), information concerning the user’s browser, information concerning errors occurred by the realization of the http transaction. Only persons authorised to administer the IT system have access to the data referred to above. Such information and its summary do not identify user.

6. SECURITY

- 6.1. The Service Provider takes care of the security of personal data. For this purpose, the Service Provider has implemented appropriate safeguards and means of protection of personal data, taking into account risks connected with personal data processing processes. In particular, the Service Provider applies technological and organisational means in order to secure personal data against being disclosed to unauthorised persons, taken over by an unauthorised person, changed, lost, damaged or destroyed, as well as processed in violation of the GDPR by using, among other things, SSL certificates. The compilations of the personal data collected by the Service Provider are stored on secured servers, moreover, personal data are also secured by internal procedures of the Service Provider related to the processing of personal data and information security policy.
- 6.2. Irrespective of the foregoing, the Service Provider states that using the Internet and services provided by electronic means may pose a threat of malware breaking into the ICT system and

device of the relevant person, as well as a third party gaining access to data, including personal data. In order to minimise such threats, each person should use appropriate technical safeguards (antivirus programs) or programs securing identification on the Internet.

7. COOKIES

- 7.1. In order to ensure the correct operation of the Platform, the Service Provider uses cookies ("Cookies"). Cookies are text information recorded on the user's device (computer tablet, smartphone) that may be read by the ICT system of the Application or third parties.
- 7.2. The Service Provider uses the following Cookies: (a) session Cookies, which are permanently deleted upon closing the session of the user's browser.
- 7.3. It is not possible to determine the identity of a given person or otherwise identify him/her on the basis of Cookies. Cookies prevent the collection of any personal data.
- 7.4. Files generated directly by the Service Provider may not be read by other websites.
- 7.5. The Service Provider uses only the Cookies necessary to ensure the proper display of the Application and to provide its functionalities to particular persons. These Cookies are mandatory, and the use of them by the Service Provider does not require consent or any other action by the respective user of the Application.
- 7.6. The user may individually change the Cookie settings at any time, stating the conditions of their storage, through the Internet browser settings.
- 7.7. The user may individually disable storing Cookies on his/her device at any time in accordance with the instructions of the Internet browser producer, but this may disable certain parts of or the entire operation of the Application.
- 7.8. Details concerning Cookie support are available in the settings of the browser used by the relevant person.
- 7.9. As part of the banner provided within the Platform, the user has the option to consent to particular types of Cookies. Within this banner, the user may also learn about the types of Cookies that are used on the Platform, as well as verify which specific Cookies are used and who their provider is.

8. FINAL PROVISIONS

- 8.1. The Privacy Policy comes into force on 29.10.2024.