



# Privacy Policy

Cobotily Sp. z o.o. with its registered office in Warsaw, ul. Prosta 70 (hereinafter referred to as "Cobotily") is the owner of the website at <https://cobotily.com> (hereinafter referred to as the "Website").

When you use our website, you share your personal data with us. At Cobotily, we take due care to protect your personal data and we make sure it is processed in accordance with the Regulation (EU) 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 (hereinafter: the "GDPR").

This Privacy Policy tells you how we collect and process your personal data and what rights you have in relation to this processing.

## **WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?**

Cobotily is the controller of your personal data. This means that Cobotily decides on the purposes and means of processing personal data collected in connection with the use of our website, i.e. what it will be used for and how it will be used.

## **HOW TO CONTACT US?**

Should you have any questions or concerns about our policy in relation to your personal data and your rights, please contact us:

- email to: [privacy@cobotily.com](mailto:privacy@cobotily.com),
- by post to the address of our registered office: Cobotily Sp. z o.o., ul. Prosta 70, 00-838 Warszawa.

## **WHAT PERSONAL DATA DO WE PROCESS? FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS?**

What data we process about you depends on the relationship we have with you (e.g. website user) and the choices you make on our website and the services you use.

For example, we may process data you provide in the contact form, data about your activity on the website and data about the device you use to connect to our website.

## **FOR WHAT PURPOSE AND ON WHAT BASIS DO WE PROCESS YOUR DATA?**

Below you will find information on the purposes for which we typically process personal data, grouped according to the services and functionalities you can use through our website.

## INFORMATION COLLECTED AUTOMATICALLY WHEN YOU VISIT THE WEBSITE AND APPLICATION:

- **System logs**

Scope of data processing	<p>When you use our website, the browser you are using on your device automatically transmits to our server data that is technically necessary to display the website and to ensure its security and stability of operation.</p> <p>This information includes:</p> <ul style="list-style-type: none"><li>• browser type/version,</li><li>• operating system used,</li><li>• URL referrer (previously visited website),</li><li>• the host name of the device in question (IP address),</li><li>• server enquiry time,</li><li>• information about errors that occurred during the execution of the HTTP transaction.</li></ul>
Purpose of data processing	<p>We use system logs to support the administration of the website, in particular to ensure the functionality and security of the website and to rectify errors.</p>
Basis of data processing	<p>We process system logs on the basis of our legitimate interest (Article 6(1)(f) of the GDPR) in ensuring the functionality and security of the website and in rectifying errors.</p>
Period of data processing	<p>We process your data for a period of time that allows us to pursue our legitimate interests or until you raise an effective objection to the data processing.</p>

- **Information from cookies and analytical tools**

Scope of data processing	<p>Our website uses cookies. Cookies are short text files, stored on users' terminal devices (such as a computer, phone or tablet), sent by the websites they visit. These cookies allow the website to recognise your device and display the website correctly, including to customise the website to your individual preferences.</p> <p>Cookies typically contain the name of the originating website, the length of time they are stored on the terminal device and a unique identifier (Cookie ID). Cookies allow us to remember information about your visit and may be used to obtain information such as: how you accessed the site, your IP address, the length of time you visited specific pages, activities related to your use of our services, including the pages you visit on our site, clicks, scrolls, features available, the type and ID of the device used to access the site.</p> <p>We use third-party tools and cookies, such as Google Analytics (Google Inc.), to collect analytics cookies that record your activity on our website.</p> <p>Depending on the website and device you use, the type and number of cookies processed may vary.</p>
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Purpose of data processing	<p>We process cookies for the following purposes:</p> <ul style="list-style-type: none"> <li>to adapt the content of our website to your preferences and to optimise the use of our website (e.g. by recognising your device and displaying the respective website suitably for your mobile device),</li> <li>with your consent, we use information from analytics cookies to create statistics that help us understand how you use our website, so that we can improve its structure and content and to market our own services and products.</li> </ul> <p>Details on the use of cookies, such as the types of cookies used by our website, including third party cookies, can be found in our <a href="#">Cookie Policy</a>.</p>
Basis of data processing	<p>The basis for processing cookies depends on the type of cookie, and so in the case of:</p> <ul style="list-style-type: none"> <li>essential cookies – we process these on the basis of our legitimate interest (Article 6(1)(f) of the GDPR) in ensuring the proper functioning of our website,</li> <li>functional and analytics cookies – we process these on the basis of your consent (Article 6(1)(a) of the GDPR) if you provide it at the time of your visit to our website, by selecting the relevant options (accept, adjust selection or reject) in the cookie consent management tool available on our website. You can always withdraw</li> </ul>
Period of data processing	<p>In the case of cookies, the processing time depends on the type of cookie. Session cookies are deleted immediately when the browser is closed, other cookies have a specific expiry date. In addition, you can disable or delete cookies on your browser yourself at any time. The details can be found in our <a href="#">Cookie Policy</a>.</p>

- Use of contact forms, contact by telephone or email**

Scope of data processing	<p>If you use the contact form available on our website to contact us, in order to send you a reply, we will process the data you have filled in, such as your first and last name, email address, telephone number, company name.</p> <p>It is also possible to contact us by telephone, email or letter, using the numbers, email and postal addresses indicated on our website. We will then process the data you make available to us that is necessary to handle the matter you have contacted us about, e.g. first and last name, telephone number, email address, postal address.</p>
Purpose of data processing	<p>We will process the data you provide for the following purposes:</p> <ul style="list-style-type: none"> <li>to handle a matter you have raised, including to contact you and respond to your question or to resolve a matter you contacted us about, including in relation to our services or your personal data;</li> <li>to market our products and services – if you have additionally given your consent to communication for the purpose of receiving commercial information from us (you can read more about marketing in the dedicated section below).</li> </ul>

Basis of data processing	<p>We process data on the following basis:</p> <ul style="list-style-type: none"> <li>• our legitimate interest (Article 6(1)(f) of the GDPR) in handling enquiries or complaints addressed to us</li> <li>• to comply with a legal obligation (Article 6(1)(c) of the GDPR) imposed on us by law (e.g. where the matter you are contacting us about is a request for the exercise of rights under the GDPR)</li> <li>• the consent you have given for the marketing of our products and services (Article 6(1)(b) of the GDPR), which you can withdraw at any time by writing to <a href="mailto:privacy@cobotily.com">privacy@cobotily.com</a>.</li> </ul>
Period of data processing	<p>We process your data for a period of time that allows us to pursue our legitimate interests or until you raise an effective objection to the data processing.</p> <p>If the processing is based on consent for the purposes of sending marketing and commercial information, we will process the data until you withdraw it.</p>

- **Marketing of our products and services**

Scope of data processing	<p>If you have consented to communication for the purpose of receiving commercial information from us, we will use the personal data you have provided using the contact form in order to provide the service.</p>
Purpose of data processing	<p>We process your data for the purpose of sending you commercial information, including for the purpose of direct marketing of our products and services, understood as the targeting of marketing messages (including informational, commercial and promotional content) via email or telephone – depending on the means you have chosen.</p>
Basis of data processing	<p>We process your data on the basis of your consent (Article 6(1)(b) of the GDPR) to electronic communication for the purpose of receiving such information from us. You can unsubscribe from our messages at any time by sending a request to <a href="mailto:privacy@cobotily.com">privacy@cobotily.com</a>.</p>
Period of data processing	<p>We process your data until you unsubscribe from receiving commercial communications (i.e. until you withdraw your consent).</p>

- **Profiling**

<p>Scope of data processing</p>	<p>For direct marketing of our products and services, in order to provide you with personalised marketing messages, we may create a profile of your preferences and interests based on data automatically collected through cookies.</p> <p>Profiling is done in order to display personalised marketing messages about our products and services, also on the pages of unrelated parties using the Google advertising network or Facebook, LinkedIn – for this purpose, unique identifiers (via cookies), time of visit and browsing history on the website are processed. We use the support of external analytics (Google Analytics, Google Tag Manager) and advertising tools (Google Ads, Facebook Pixel, LinkedIn Insight Tag) to analyse, profile and personalise messages.</p>
<p>Purpose of data processing</p>	<p>Profiling aims to tailor the marketing content or information sent and presented to you to your interests. The data is not processed for the purpose of automated decision-making. The profiling we perform does not result in decisions that produce legal effects for you or affect you in a similarly significant manner.</p>
<p>Basis of data processing</p>	<p>We process data on the following basis:</p> <ul style="list-style-type: none"> <li>• Onwelo’s legitimate interest (Article 6(1)(f) of the GDPR) in carrying out direct marketing activities, including profiling,</li> <li>• the consent you have provided regarding the use of cookies, which you express when you visit our website, when our cookie acceptance tool is displayed, which gives you the option to accept or reject cookies. You can always withdraw your consent by changing your browser settings – see our <a href="#">Cookie Policy</a>.</li> </ul>
<p>Period of data processing</p>	<p>We process your data until the expiry dates of the individual cookies or until you unsubscribe from the personalised communications, i.e. until you withdraw your consent or object to profiling by rejecting the cookies, deleting them or blocking them in your browser settings.</p>

- **Interaction through our social media profiles**

<p>Scope of data processing</p>	<p>If you follow our social media profiles (Facebook, LinkedIn), we process your user name, first and last name (if this data is visible in your profile), information on how long you have been following us, your comments and reactions to our content and other data that the platform processes for the purpose of creating statistics. We receive data from you when you start following our social media profiles or otherwise interact with us. We share your data with the social media on which we maintain our profiles, i.e. Google Ireland Ltd. and LinkedIn Corp. Note that social media themselves collect personal data (in connection with the user profiles created on them), so you should familiarise yourself with the privacy policies of these platforms..</p>
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Purpose of data processing	<p>We process this data for the following purposes:</p> <ul style="list-style-type: none"> <li>to interact with you on the social media profiles we run, including to reply to your private messages and to react to your comments under posts,</li> <li>to promote our activities through the posts we publish on social media.</li> </ul>
Basis of data processing	<p>We process data on the following basis:</p> <ul style="list-style-type: none"> <li>our legitimate interest (Article 6(1)(f) of the GDPR) in responding to enquiries and comments, providing information about our activities, analysing statistics related to our social media channels.</li> </ul>
Period of data processing	<p>We process the data as long as you follow our profiles or interact with us. Remember that you can always delete your comments under our posts, stop following us or delete your social media account.</p>

- Establishment, pursuit or defence of claims**

Scope of data processing	Data contained in electronic forms, system logs, user identification data, device and usage data and any other data necessary to prove a claim.
Purpose of data processing	To establish, pursue and defend claims.
Basis of data processing	We process the data on the basis of our legitimate interest (Article 6(1)(f) of the GDPR) in being able to establish, assert or defend against claims.
Period of data processing	Until the expiry of the statute of limitations for claims, as set by law.

### **INFORMATION ON THE REQUIREMENT TO PROVIDE DATA**

The provision of personal data is voluntary, but may be necessary in order to benefit from the services provided by Cobotily, e.g. to obtain a response to an enquiry made via the contact form.

### **INFORMATION ON PROFILING AND AUTOMATED DECISION-MAKING**

The processing of your personal data does not involve automated decision-making, including profiling.

### **RECIPIENTS OF PERSONAL DATA**

Your personal data in connection with the use of the website may be shared with:

1. Our authorised employees and persons working with us under civil law contracts.

2. Our suppliers and service providers delivering:
  - hosting and maintenance services for our website, ICT services and IT support and security services,
  - statistical and analytical services (e.g. Google Analytics) or online marketing services,
  - call centre services,
  - marketing services,
  - legal advisory services.
3. Authorised state bodies, e.g. police, public prosecutor's office, courts and supervisory authorities in the field of personal data protection in order to comply with our legal obligations.

### **DO WE USE LINKS TO OTHER WEBSITES AND SOCIAL MEDIA?**

Our website contains links to the websites of other companies; if you wish to use them, you should consult their respective privacy policies.

We have also integrated the so-called social media plug-ins into our website, which redirect you straight to our profiles on the following social media platforms:

- Facebook Inc.
- LinkedIn Corporation

When you click on a plug-in, your browser is connected directly to the server of the respective portal. If you are logged in to any of the social networks at the time, information about your visit to our site will be sent to their servers and can be traced back to your account on the respective social network. If you do not wish to transmit this data, please log out of the respective social network before clicking on the plug-in. The purpose and scope of data collection and the further processing and use of data by social media, as well as your related rights and settings options to protect your privacy can be found in the privacy policies of these social media portals.

### **DO WE TRANSFER YOUR DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)?**

Some of our providers may be based outside the EEA and therefore your data may be processed outside the EEA. In such cases, we exercise due diligence to ensure that the transfer of data is lawful and appropriate safeguards are implemented. This includes in particular the use of standard contractual clauses approved by the European Commission and the EU-U.S. Data Privacy Framework certification mechanism.

### **YOUR RIGHTS IN RELATION TO THE PROCESSING OF PERSONAL DATA**

Under the terms of the GDPR, you have the following rights:

- The right to access and obtain a copy of your personal data (Article 15 of the GDPR)
- The right to rectify (amend) your personal data (Article 16 of the GDPR),
- The right to restrict the processing of personal data in the cases set out in Article 18 of the GDPR,



- The right to have your personal data erased in the cases set out in Article 17(1) of the GDPR, subject to the exceptions set out in the provision of Article 17(3) of the GDPR,
- The right to data portability in the cases set out in Article 20 of the GDPR,
- The right to object to the processing of your personal data in the cases set out in Article 21 of the GDPR – you have the right to object at any time to the processing of your personal data, including profiling, where we are processing your data on the basis of our legitimate interest (e.g. in the case of marketing our products and services).
- The right to withdraw your consent – you have the right to withdraw the consent you have given if we are processing your personal data on the basis of your consent; such withdrawal only has effect for the future and does not affect the processing we lawfully carried out before the withdrawal.

Requests for the exercise of rights should be made by email to [privacy@cobotily.com](mailto:privacy@cobotily.com).

You have the right to lodge a complaint with the supervisory authority dealing with the protection of personal data if you consider that the controller is processing your personal data contrary to the requirements of the law. The supervisory authority has jurisdiction over your place of residence or stay. In Poland, the supervisory authority is the President of the Office for Personal Data Protection (<https://uodo.gov.pl>).

## **DATA SECURITY**

We make every effort to ensure the security of your personal data, through organisational and technical protection measures to prevent unauthorised persons from obtaining and modifying your personal data.

## **UPDATE OF THE PRIVACY POLICY**

Any modifications of the Privacy Policy will be made by publishing a new version on our website.

The current version of the Policy is effective as of 21.02.2024.