

PRIVACY POLICY OF THE WEBSITE WWW.REDESIGNERPLANNER.COM

§1 GENERAL PROVISIONS

1. The administrator of personal data collected via the Website www.redesignerplanner.com is Damian Idczak, conducting business activity under the firm Damian Idczak, entered into the Central Register and Information on Economic Activity of the Republic of Poland kept by the minister responsible for the economy, place of business and address for service: ul. Nidas Leśny 26a, 95-080 Tuszyn, NIP (Tax Identification Number): 7282893112, REGON (National Business Registry Number): 540577030, e-mail address: contact@redesignerplanner.com, phone number: 888753735, hereinafter referred to as the "Administrator" and simultaneously the "Service Provider".
2. Personal data collected by the Administrator via the Website are processed in accordance with 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), hereinafter referred to as GDPR, and the Consumer Rights Act of 30 May 2014.
3. Any capitalized words or expressions in the content of this Privacy Policy should be understood in accordance with their definition contained in the Website Regulations www.redesignerplanner.com.

§2 PURPOSE AND SCOPE OF DATA COLLECTION

1. PURPOSE OF PROCESSING AND LEGAL BASIS. The Administrator processes the personal data of Service Recipients of the Website in the case of:
 - 1.1. registration of an Account on the Website, in order to create an individual account and manage this Account, pursuant to Art. 6 sec. 1 lit. b) GDPR (performance of a contract for the provision of electronic services in accordance with the Website Regulations),
 - 1.2. placing an Order, in order to perform the Agreement for the provision of a Digital Service pursuant to Art. 6 sec. 1 lit. b) GDPR (performance of a contract),
 - 1.3. Execution of other activities important/necessary from the point of view of the functioning of the Website, i.e.:
 - 1.3.1. Product analytics and Website improvement (measurements, A/B testing, telemetry): Art. 6 sec. 1 lit. f GDPR - legitimate interest of the Administrator in improving the quality and usability of services,
 - 1.3.2. Security and fraud prevention (logs, DDoS protection, rate-limit, violation detection): Art. 6 sec. 1 lit. f GDPR.
 - 1.3.3. Direct marketing, newsletter and commercial communication - to the extent required by the provisions of the Electronic Communications Law (PKE): Art. 6 sec. 1 lit. a GDPR (consent). Consent may be withdrawn at any time.
 - 1.3.4. Pursuing or defending claims: Art. 6 sec. 1 lit. f GDPR.
2. TYPE OF PERSONAL DATA PROCESSED. The Service Recipient provides, in the case of:

- 2.1. Account: name and surname, NIP, e-mail address,
 - 2.2. Order: name and surname, NIP, e-mail address,
 - 2.3. identification and contact data: name and surname, NIP, e-mail;
 - 2.4. billing data (to the extent they constitute personal data within the meaning of the GDPR): transaction data from the payment operator (without full card data);
 - 2.5. marketing/analytical data (with consent or within the limits of objection, to the extent they constitute personal data within the meaning of the GDPR): open/click history, segments, preferences.
3. ARCHIVING PERIOD FOR PERSONAL DATA. The personal data of Service Recipients are stored by the Administrator:
- 3.1. in the case where the basis for data processing is the performance of a contract, for as long as it is necessary to perform the contract, and thereafter for a period corresponding to the period of limitation of claims. Unless a specific provision stipulates otherwise, the limitation period is six years, and for claims for periodic benefits and claims related to conducting business activity - three years,
 - 3.2. in the case where the basis for data processing is consent, until the consent is revoked, and after the revocation of consent for a period corresponding to the period of limitation of claims that may be raised by the Administrator and that may be raised against him. Unless a specific provision stipulates otherwise, the limitation period is six years, and for claims for periodic benefits and claims related to conducting business activity - three years.
4. Data processed in connection with the use of AI functions in the Application.
- 4.1. The Application uses artificial intelligence models to generate content based on data entered by the User (prompts, files).
 - 4.2. AI functions may be implemented using external technology providers (sub-processors), including language model/cloud computing providers located within the EEA and/or outside the EEA. The Administrator notifies about planned changes of sub-processors; the Client may object. User prompts, files, and AI event logs are stored for the period necessary to ensure security, accountability, and technical support, no longer than 360 days, unless a longer period results from pursuing claims or legal obligations. This data is not used to train models without prior, explicit consent.
 - 4.3. The Administrator does not use input data or content generated by the User to "learn/train" models without the User's prior, explicit consent.
 - 4.4. The User should verify the content generated by AI before its publication/use.
 - 4.5. In cases required by law, the User may have an obligation to disclose to recipients that the content was generated or co-created by AI.
 - 4.6. The Administrator conducts logging of significant system events and human oversight over the operation of AI functions in order to ensure security and accountability.
 - 4.7. The User should not send content containing personal data to the Website, in particular images, for the purpose of using the Digital Service. By sending such content, the Client does so at their own risk. The Administrator stores files uploaded by the User only for the period required by law.

5. While using the Website, additional information may be downloaded, in particular: the IP address assigned to the Service Recipient's computer or the external IP address of the Internet provider, domain name, browser type, access time, operating system type.
6. Upon granting separate consent, pursuant to Art. 6 sec. 1 lit. a) GDPR, data may also be processed for the purpose of sending commercial information electronically or making telephone calls for direct marketing purposes - respectively in connection with Art. 398 sec. 1 and 2 of the Act of July 12, 2024. Electronic Communications Law, including those directed as a result of profiling, provided the Service Recipient has given appropriate consent.
7. As part of the User's activity on the Website/Application, profiling may take place, which aims to select appropriate advertising content that will be directed to the User.
8. Profiling means any form of automated processing of personal data, which consists of using personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, personal preferences, interests, reliability, behavior, location or movements. Profiling does not produce legal effects concerning the Service Recipient or similarly significantly affect their situation. Its purpose is solely to better match marketing content and offers.
9. Navigational data may also be collected from Service Recipients, including information about links and references they choose to click or other actions taken on the Website. The legal basis for this type of activity is the legitimate interest of the Administrator (Art. 6 sec. 1 lit. f GDPR), consisting in facilitating the use of services provided electronically and improving the functionality of these services.
10. Providing personal data by the Service Recipient is voluntary but necessary for the proper use of the Website, including the conclusion of an agreement for the provision of a Digital Service.
11. The Administrator exercises particular care to protect the interests of data subjects, and in particular ensures that the data collected by him are:
 - 11.1. processed lawfully,
 - 11.2. collected for specified, lawful purposes and not further processed in a manner incompatible with those purposes,
 - 11.3. factually correct and adequate in relation to the purposes for which they are processed, and kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

§3 RECIPIENTS OF PERSONAL DATA

1. The personal data of Service Recipients are transferred to service providers utilized by the Administrator in operating the Website, and in particular to:
 - 1.1. payment system providers,
 - 1.2. accounting office,
 - 1.3. hosting provider,
 - 1.4. provider of software enabling the conduct of business and the provision of Digital Services,
 - 1.5. entities providing the mailing system,
 - 1.6. provider of software needed to run the website.

2. The service providers referred to in point 1 of this paragraph to whom personal data are transferred, depending on contractual arrangements and circumstances, are either subject to the Administrator's instructions as to the purposes and methods of processing such data (processors) or determine the purposes and methods of their processing themselves (administrators).
3. The personal data of Service Recipients are stored exclusively within the European Economic Area (EEA), subject to § 5 point 5 and § 6 of the Privacy Policy.
4. Personal data may be transferred outside the European Economic Area (EEA), in particular to the United States, in connection with the Administrator's use of services provided by analytical and marketing tool providers (e.g., Google LLC, Meta Platforms Inc.). The transfer of data takes place on the basis of Standard Contractual Clauses (SCC) approved by the European Commission, in accordance with Art. 46 sec. 2 lit. c GDPR.

§4 THE RIGHT OF CONTROL, ACCESS TO THE CONTENT OF ONE'S OWN DATA AND THEIR CORRECTION

1. The data subject has the right to access the content of their personal data and the right to their rectification, erasure, restriction of processing, the right to data portability, the right to object, the right to withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.
2. Legal bases for the Service Recipient's request:
 - 2.1. Access to data - Art. 15 GDPR.
 - 2.2. Rectification of data - Art. 16 GDPR.
 - 2.3. Erasure of data (the so-called right to be forgotten) - Art. 17 GDPR.
 - 2.4. Restriction of processing - Art. 18 GDPR.
 - 2.5. Data portability - Art. 20 GDPR.
 - 2.6. Objection - Art. 21 GDPR.
 - 2.7. Withdrawal of consent - Art. 7 sec. 3 GDPR.
3. In order to exercise the rights referred to in point 2, an appropriate e-mail can be sent to: contact@redesignerplanner.com.
4. In the event that the Service Recipient exercises a right resulting from the above rights, the Administrator complies with the request or refuses to comply with it immediately, but no later than within a month after receiving it. If, however, due to the complex nature of the request or the number of requests, the Administrator is unable to comply with the request within a month, he will comply with it within the next two months, informing the Service Recipient in advance - within a month of receiving the request - about the intended extension of the deadline and its causes.
5. If it is found that the processing of personal data violates the provisions of the GDPR, the data subject has the right to lodge a complaint with the President of the Personal Data Protection Office.

§5 "COOKIES" FILES

1. The Administrator's website uses "cookies".
2. The installation of "cookies" is necessary for the proper provision of services on the Website. "Cookies" contain information necessary for the proper functioning of the

website, and they also provide the opportunity to compile general statistics of website visits.

3. The website utilizes two types of "cookies": "session" and "persistent".
 - 3.1. "Session" cookies are temporary files that are stored on the Service Recipient's end device until logging out (leaving the website),
 - 3.2. "Persistent" cookies are stored on the Service Recipient's end device for the time specified in the "cookies" parameters or until they are deleted by the Service Recipient.
4. The Administrator uses its own cookies exclusively necessary for the operation of the Website in order to better understand how Service Recipients interact with the content of the page. The files collect information about the manner in which the Service Recipient uses the Website, the type of page from which the Service Recipient was redirected, and the number of visits and the time of the Service Recipient's visit to the website. This information does not record specific personal data of the Service Recipient, but serves to compile statistics on the use of the website.
5. The Administrator also uses external cookies to collect general and anonymous static data via Google Analytics analytical tools (external cookie administrator: Google LLC. based in the USA).
6. Cookies may also be used by advertising networks, in particular the Google network, in order to display advertisements tailored to the way the Service Recipient uses the Website. For this purpose, they may retain information about the Service Recipient's navigation path or time remaining on a given page.
7. The Service Recipient has the right to decide regarding the access of "cookies" to their computer by:
 - 7.1. selecting the types of cookies they consent to collect immediately upon entering the Website and the appearance of the message regarding cookies,
 - 7.2. changing settings in their browser window. Detailed information about the possibilities and ways of handling "cookies" are also available in the software (web browser) settings.

§6 ADDITIONAL SERVICES RELATED TO USER ACTIVITY ON THE WEBSITE

1. The Website uses so-called social plugins ("plugins") of social networking sites. By displaying the website www.redesignerplanner.com containing such a plugin, the Service Recipient's browser will establish a direct connection with Instagram servers.
2. The content of the plugin is transferred by the given service provider directly to the Service Recipient's browser and integrated with the page. Thanks to this integration, service providers receive information that the Service Recipient's browser has displayed the website www.redesignerplanner.com, even if the Service Recipient does not have a profile with a given service provider or is not currently logged in. Such information (along with the Service Recipient's IP address) is sent by the browser directly to the server of a given service provider (some servers are located in the USA) and stored there.
3. If the Service Recipient logs into one of the above social networking sites, this service provider will be able to directly assign the visit to the website www.redesignerplanner.com to the Service Recipient's profile on the given social networking site.

4. If the Service Recipient uses a given plugin, e.g., by clicking the "Like" or "Share" button, the relevant information will also be sent directly to the server of a given service provider and stored there.
5. The purpose and scope of data collection and their further processing and use by service providers, as well as the possibility of contact and the rights of the Service Recipient in this regard, and the possibility of making settings ensuring the protection of the Service Recipient's privacy have been described in the privacy policy of the service providers:
 - 5.1. https://help.instagram.com/519522125107875?helpref=page_content
6. If the Service Recipient does not want social networking sites to assign the data collected during visits to the website www.redesignerplanner.com directly to their profile on a given site, they must log out of this site before visiting www.redesignerplanner.com. The Service Recipient may also completely prevent the plugins from loading on the page by using appropriate browser extensions, e.g., blocking scripts using "NoScript".
7. The Administrator uses remarketing tools, i.e., Google Ads, on its website. Their use involves the utilization of Google LLC. cookies relating to the Google Ads service. As part of the mechanism for managing cookie settings, the Service Recipient has the opportunity to decide whether the Service Provider will be able to use Google Ads (external cookie administrator: Google LLC. based in the USA) in relation to them.

§7 FINAL PROVISIONS

1. The Administrator applies technical and organizational measures ensuring the protection of processed personal data appropriate to the threats and categories of data protected, and in particular protects data against unauthorized disclosure, removal by an unauthorized person, processing in violation of applicable regulations, and alteration, loss, damage or destruction.
2. The Administrator provides appropriate technical measures to prevent unauthorized persons from obtaining and modifying personal data sent electronically.
3. In matters not regulated by this Privacy Policy, the provisions of the GDPR and other relevant provisions of Polish law shall apply accordingly.