

Privacy Policy

Since your privacy is important to us, please read the information below.

In our business, we process personal data of individuals. If you use our services, website, mobile application, or otherwise communicate with us, this means that we most likely process your personal data.

In this Policy you will find all relevant information, including who we are, in what situations, for what purposes and to what extent we process your personal data, and what rights you have.

Should anything be unclear to you or need to be discussed, you can always contact us – see below for contact information.

If you do not agree with our Privacy Policy, please do not use our service. Each user decides for himself/herself whether to exercise his/her rights related to control over the processing of his/her data. Exercising the rights that lead to preventing the processing of personal data by the controller, to the extent that they are necessary for the provision of the service by the controller, is tantamount to terminating the service in question.

Who we are and how you can contact us

Controller

The controller of personal data of persons using the senuto.com website and all its subpages (hereinafter: ("Site")) within the meaning of Regulation (EU) 679/2016 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: GDPR) is: SENUTO SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ with its registered office in Warsaw (02-738), at ul. Dominikańska 13, entered in the Business Register of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 13th Commercial Division of the National Court Register, under No. KRS 0000464809, NIP (Tax Identification Number): 9512367837, REGON (Statistical ID No.): 146703642.

Whenever used herein, words "controller", "we", "us", "our", etc. mean Senuto sp. z o.o.

Contact data

You can contact us as follows:

- a. via email at: dane@senuto.com

- b. by chat, Monday to Friday, 9.00 am to 5.00 pm,
- c. by mail sent to the following address: Senuto Sp. z o.o., ul. Dominikańska 13, 02-738 Warsaw, Poland

Safeguards

We are committed to protecting the privacy of all users of our Site, in particular by taking all precautions required by law to protect your personal information against loss, destruction, disclosure, unauthorized access and misuse. Also users, by taking appropriate steps, can contribute to the safety of their data, including personal data on the Internet (including by frequently changing access passwords, using combinations of letters and digits in them).

At the same time, we point out that we are not responsible for the privacy policies of the websites to which you are redirected by clicking on the links provided on the pages of our Site.

What we do

We provide our users with services (hereinafter “**services**”) consisting in providing marketing tools through which users can use functionalities that allow them, among other things, to make multi-faceted analyses of how their website fits into search engine standards, prepare a marketing strategy based on the data and tools we have, and obtain reports on keyword usage, ad data, etc. To this end, we use the Senuto application (hereafter “**Application**”), available in a software-as-a-service model. We operate a website at senuto.com, as well as the Senuto mobile application, which our Users can use to benefit from our services (hereinafter collectively “**Site**”).

Our users are mainly companies and organizations contracting with us. Details of how we provide services are regulated in the [Terms and Conditions](#).

For what purpose and on what basis we process your data

This Privacy Policy applies to each person visiting and using the Site. The purpose and the basis on which we process your data depends on how you use our services or contact us and what your role is. We have described each of the situations below.

Use of the site without registration

We process your data to ensure that our Site is functional. These functionalities are mainly the ability to browse the content of the Site, the ability to use the web chat and contact forms, customizing the content of the Site to your preferences.

In such case, the legal basis for our data processing is our legitimate interest in enabling you to use the Site and its functionality, in accordance with Article 6(1)(f) of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, hereinafter “GDPR”.

We process data about your use of the Site, which we obtain through essential cookies and similar technologies and use to ensure the proper operation of the Site, in particular the ability to navigate the Site and use its basic functions, on the basis of our legitimate interest in ensuring the proper operation of the Site (Article 6(1)(f) of the GDPR).

We process data about your use of the Site, which we obtain through functional cookies and similar technologies and use to “remember” the settings you have selected and to personalize the Site, on the basis of our legitimate interest in enabling us to “remember” the settings you have selected and to personalize the Site (Article 6(1)(f) of the GDPR).

We process data about your use of the Site, which we obtain through analytical cookies and similar technologies and use to provide analytics and statistics on users’ use of the Site in order to improve its performance - which involves, for example, analyzing how users navigate the Site to understand how users use the Site and make it more intuitive and convenient to use in the future, on the basis of your consent to the processing of personal data (Article 6(1)(a) of the GDPR).

We process data about your use of the Site, which we obtain through advertising cookies and similar technologies and use for marketing purposes, such as personalizing ads and content based on your interests, measuring the performance of ads and content, and gaining insight into the audiences who have seen ads and content, based on your consent to the processing of personal data (Article 6(1)(a) of the GDPR).

For details on cookies, see below under Cookies section.

Registration on the site and provision of services

Registration is required for the user to use our services via the Senuto Application.

Registration is always performed by a specific individual. This can be the user himself/herself, if an individual, but this can be an individual who is a member of a body, a proxy, an employee or a civil associate of the user, in which case the individual acts on behalf of the user. We will refer to such persons as “**associates**” without prejudging the specific legal basis on which such person acts on behalf of the user.

Accordingly, we may process your personal data if you are our user or an associate of the user registered with our Site and you are the one who registers on his/her behalf, while providing your personal data.

When registering, please provide personal data – email address, phone number and occupation. In the case of a user who is an individual, this will be his/her personal data. If, on the other hand, the registration is performed by an associate of the user on behalf of the user, please provide personal data of both the associate and the user himself/herself.

In both cases, the data are processed for the purpose of entering into and performing a services agreement between us and the user, in connection with registration.

For the purpose of processing payments and charging you with a VAT invoice for the services we provide, we also process data including the number, expiration date and CVC or CCV number of the payment card you provide, the address of the user being charged with the VAT invoice, and your VAT ID number.

In the case of users who are individuals, the legal basis for processing their data is the necessity to perform the agreement to which the user is a party (Article 6(1)(b) of the GDPR) and our legitimate interest in being able to establish, exercise or defend potential legal claims that may arise in connection with the performance of the agreement to which the user is a party (Article 6(1)(f) of the GDPR). In the case of users' associates, the legal basis for processing their data is our legitimate interest in ensuring the proper conclusion and performance of the agreement to which the user is a party, in particular ensuring contact with the user during the period of performance of the Agreement, verifying that the associate is authorized to take steps and make statements on behalf of the user, and establishing, exercising or defending potential legal claims that may arise in connection with the performance of the agreement to which the user is a party (Article 6(1)(f) GDPR).

In addition, when you log in to the Site, you can change your personal data, including payment details, collected during registration and used to log in to the Site.

Use of the MCP Server

The MCP Server is a means of accessing data held in the User's Account in the Application, designed for AI Clients. A User who has access to the MCP Server logs in to it using the same credentials with which he/she logs in to the User Account in the Application, with the difference that logging in to the MCP Server takes place via a dedicated OAuth form. Once logged in, the User's AI Client can query SEO data from the User's Account in the Application, such as in particular domain positions, keywords, visibility, competitors, Rank Tracker, etc.

The following personal data are processed within the MCP Server:

- the User's email: in order to enable logging in to the MCP Server;

- IP address: rate limiting, security logs;
- the Application API token: in order to maintain the session in the event of a restart;
- session usage data, such as the authentication method, session duration, number of tool calls: for monitoring and analytics purposes;
- SEO data from the User's Account in the Application: processed in order to enable proper use of the MCP Server.

The User's login data are used solely to obtain the API token and are not stored on the MCP Server, as is the case with your SEO data retrieved from the User's Account in the Application, which are processed only for the duration of the session.

In the case of users who are individuals, the legal basis for processing their data is the necessity to perform the agreement to which the User who has purchased access to the MCP Server is a party (Article 6(1)(b) of the GDPR) and our legitimate interest in being able to establish, exercise or defend potential legal claims that may arise in connection with the performance of the agreement to which the user is a party (Article 6(1)(f) of the GDPR). In the case of users' associates, the legal basis for processing their data is our legitimate interest in ensuring the proper conclusion and performance of the agreement to which the user is a party, in particular ensuring contact with the user during the period of performance of the Agreement, verifying that the associate is authorized to take steps and make statements on behalf of the user, and establishing, exercising or defending potential legal claims that may arise in connection with the performance of the agreement to which the user is a party (Article 6(1)(f) of the GDPR).

Workshops and Webinars

Whether you register with our Site or not, we allow you to participate in various workshops, training events and webinars as part of our activities. They cover a wide range of SEO topics and the creation of content placed on websites. In order for you to participate, you must provide us with your personal data, such as your name, email address and contact phone number.

The legal basis for the processing of the personal data you provided when registering for a workshop or webinar is Article 6(1)(a) of the GDPR, i.e. your express consent to the processing of your personal data in order to enable you to participate in the workshop or webinar.

Custom Reports

Custom Reports is one of the types of services we provide. It allows us to prepare a report that includes keyword research, Google Ads data for any Internet domain, a review of the business database created based on Google Maps, a compilation of information about online stores, conducting an analysis of specific industries in the search engine, investigating the correctness of internal linking conducted on your Internet domain, as well as a customer journey analysis.

If you want us to provide Custom Reports service to you, it will be necessary for you to provide such personal data as name, surname, company name, e-mail address, telephone number.

The legal basis for processing the data is the necessity to perform a Custom Reports service agreement to which the person providing data is a party (Article 6(1)(b) of the GDPR) and our legitimate interest in being able to establish, exercise or defend potential legal claims that may arise in connection with the performance of the agreement to which the user is a party (Article 6(1)(f) the GDPR).

Business contacts – users, counterparties and their associates

Whether you register on our Site or not, in the course of our business we interact with current or potential users (customers), counterparties, suppliers, as well as individuals who are their associates (e.g., members of bodies, proxies, employees, associates, etc.). Such communication can take place through various channels - for example, in the form of emails or by telephone, and in such case we process personal data of individuals involved in such communication. In addition to this, the data of such individuals may be provided, for example, in our commercial agreements (as the data of signatories or contact persons).

As such, we may process your personal data if you are one of the above-named individuals.

Where a commercial agreement is entered into with an individual, the legal basis for the processing of such individual's data is the necessity to conclude and perform such agreement (Article 6(1)(b) of the GDPR) and our legitimate interest in being able to establish, exercise or defend potential legal claims that may arise in connection with the performance of such agreement (Article 6(1)(f) of the GDPR). As regards associates of our users, counterparties, suppliers, etc., the legal basis for data processing is our legitimate interest in day-to-day contacts in the course of business and the conclusion and performance of agreements (Article 6(1)(f) of the GDPR) and the possibility of establishing, exercising or defending potential legal claims that may arise in connection with the performance of agreements (Article 6(1)(f) of the GDPR).

Marketing

We process your data for our own marketing purposes, i.e. promoting our services.

Marketing purposes include presenting you with offers and promotions, offering you additional functionalities, etc., including broadcasting advertisements on third-party sites (such as, e.g., Facebook or Google).

If you consent, we may also send you commercial information about our products in the manner of your choosing - e.g., via email, SMS/MMS, telephone, push notifications

or other electronic communications. In such case, we will use your data to send you commercial information in the manner of your choosing.

The legal basis for the processing of your data for marketing purposes is our legitimate interest in enabling us to exercise our rights based on your consent to receive commercial information regarding our products in the manner of your choosing (Article 6(1)(f) of the GDPR).

Contact forms

We provide contact forms and web chat on the site to make it easier for you to contact us. In order to use a form, you need to provide your personal data necessary to be contacted and to receive a reply to your inquiry. You can also provide other data to facilitate contact or the handling of your inquiry. In such case, we process your data in order to identify you and handle your inquiry - the legal basis for the processing is our legitimate interest in communicating with our customers and handling inquiries made via contact forms and web chat (Article 6(1)(f) of the GDPR).

Controller's other own purposes

We also process your data for other purposes that constitute our legitimate interests, such as:

- a. establishing, exercising or defending legal claims, including in connection with the provision of our services;
- b. contacting you – to respond to your notifications and requests for contact, complaints, to be able to contact you on matters related to the provision of our services, to inform you of any amendments to the Terms and Conditions and the Privacy Policy;
- c. verifying accounts, investigating suspicious activity, detecting and preventing fraud and other violations of law or the [Terms and Conditions](#);
- d. for the purpose of monitoring, testing and improving our services and resolving any related issues;
- e. to invite users to participate in projects and interview them about their work experiences related to using the Site, among other things.
- f. to prepare reports using Google Looker Studio, based on the available data, to facilitate their configuration, visualization and sharing of the available statistics.

The legal basis for such processing is Article 6(1)(f) of the GDPR.

In addition to this, we process our users' data for the purpose of complying with our legal obligations, arising in particular from tax and accounting regulations, including to ensure accountability (to demonstrate our compliance with legal obligations). We cooperate with law enforcement agencies and other institutions authorized to request access to your data based on applicable laws. The legal basis for such processing is a legal obligation (Article 6(1)(c) of the GDPR).

From whom we collect your personal data

Data collected directly from the data subject or the user

We collect your personal data mainly from you. You provide them to us, for example, when creating an account on the Site, signing up for newsletters or other forms of marketing. You can also unsubscribe from the newsletter yourself or ultimately delete your account from the Site by contacting us at e-mail address: hello@senuto.com. Each of the communications sent by the Controller as part of the provision of the newsletter service contains a link that allows you to opt out (opt-out option).

We acquire personal data of users of our Site and individuals representing users who are legal entities, as well as other visitors to the Site, mostly directly from data subjects.

If you are an associate of our user, we may have received your data from the user or from his/her other associates – for example, if you are a contact person in respect of a particular agreement or you are involved in a particular project.

You can also provide us with your personal data by communicating with us – e.g. asking questions about services, submitting complaints – on the Site via e-mail, by phone or mail.

In addition, we process your data on how you use the Site from our offers and services.

We may also acquire personal data from other entities that are not users of our Site or their associates, such as Facebook in particular, as long as the data subjects give their consent to the relevant entity providing us with personal data.

Sending commercial information by electronic means

If you consent to receiving commercial information by electronic means (e.g., via e-mail or through tools such as push notifications, web chat or chatbot), sending such information will be tantamount to sending commercial information by electronic means and may also constitute direct marketing through the use of telecommunications terminal equipment conducted using automatic calling devices – depending on the device on which you receive such communications.

If you agree to be contacted by phone or SMS for marketing purposes, commercial information will be transmitted by phone to the phone number which you provided for this purpose. Such contact will constitute direct marketing using telecommunications terminal equipment and may be conducted using automated calling devices.

You can withdraw such consents at any time, or restrict the manner which we use to send you such information – for details see below under “Withdrawal of consent and objection to processing” section.

Profiling for marketing purposes

In some cases, for marketing purposes, we may make automated decisions to you based on profiling, i.e. automatic processing of your personal data. Profiling is a way of processing personal data that involves, among other things, using personal data to analyse or predict personal preferences, interests, etc. The use of profiling makes it possible to customize advertising and content presented to the user.

The profiling we may use may involve using computer algorithms to analyze your personal data (your behaviour on the Site, your use of the Application, data collected through cookies, as well as the personal data you provide) in order to display to you directly on the Site, or in direct marketing (e-mails, SMS/MMS, telephone marketing, push notifications, web chat or chatbot etc.), as well as on third-party websites (so-called remarketing), tailored offers based on your potential preferences and interests that may relate to our services.

The basis for profiling is generally our legitimate interest in marketing our own services in a way that matches your hypothetical preferences (Article 6(1)(f) of the GDPR). However, in some cases we ask you to give consent to selected forms of marketing or automated decision-making towards you on the basis of profiling, in which case the legal basis for processing is your consent (Article 6(1)(a) of the GDPR).

What personal data we process

General information

What data we process depends on your situation, including your use of the Site, as well as the data you provide to us and your role. In particular, we may process the following categories of your personal data:

- a. name, surname;
- b. company name, TIN, business address;
- c. your occupation;
- d. e-mail address, telephone number – which you provide, for example, when registering or for marketing or sending commercial information electronically on the basis of a separate consent;
- e. information about which of our services you use;

- f. data required for the purpose of paying for our services (e.g., your bank account number, the name of the bank holding the account, the number, expiration date and CVC or CCV number of the payment card provided);
- g. information about your use of our Site collected through cookies (if you have given your consent to the use of cookies – for details on the use of cookies, see below under the **Cookies section**), such as: payment currency, overall profits generated, the current Package you use, the country in which you use the Site; information about clicks, accesses to selected tabs and sub-pages on the Service and Application, and other activities you perform as a user on the Site and Application. In addition, in order to improve the Site and the Application, we will record your mouse movements on the Site by recording the screen of your use of the Site and the Application, while obscuring any sensitive data, passwords - we ensure that a limited number of people operating the Site and the Application will have access to such data.
- h. IP address from which you communicate with our Site, information about the device you use when visiting the Site, including its settings (e.g. browser, screen resolution), the Application API token you hold;
- i. information you include in your statements and communications sent to us – such as email correspondence or telephone conversations, as well as complaints, for example;
- j. the content and scope of the consents you have provided via the Site.

Data collected automatically

During your presence on the Site and use of our Application, some of your data will be collected automatically.

Data acquired automatically on the Site

We process so-called usage data (data characterizing the use of the Site), including in particular identifying data, your IP address, data identifying the telecommunications network termination or information and communication system you use, browser type, browser language, information about the use of our services, information about the start, end and scope of your use of the Site each time, type and version of the operating system, screen resolution, data collected in server logs and other similar information.

Data acquired automatically via the Mobile Application

If you use our mobile application we will collect and gather data such as: certain information about the mobile phone or tablet used to access the application, including the mobile device ID (Device ID), user ID (User ID), type and version of the operating program.

Our application may ask, depending on the needs and functions of the mobile application, for access to various peripheral devices, in respect of which you may refuse consent.

Data acquired automatically from third-party providers

We may also automatically acquire personal data from other entities that are not users of our Site or their associates, such as: Facebook or Google.

We only use your data acquired from third-party providers in connection with the provider's tool or application provided to us. Your data acquired automatically from third-party providers will not be collected by us or shared with other parties, and our access to them is limited to our ability to process them in connection with and with the use of the provider's tool or application.

Purposes of processing automatically collected data

We will use the above data (i.e., data collected through the Site and Application), among other things, to analyse traffic information on the Site and the Application, to transmit communications on the Site and Application, as well as to provide the service requested by you.

Notwithstanding the above, we will use the data we collect automatically to customize the content and advertise our services, within and outside of our site as part of remarketing (for more details, see below under the Cookies section). Data collected automatically may be used for profiling.

We will also use the data collected automatically to monitor traffic on the Site pages and in the Application.

How long we retain your data

The period of time for which we may retain your personal data depends on the purpose and legal basis for processing. More specifically:

- a. where we process your personal data on the basis of your consent - until you withdraw such consent;
- b. in the case of processing for the purpose of performing an agreement with you - for the term or performance of the agreement or until you terminate your account on the Site and, after such time, for the period of limitation of claims that may arise in connection with the performance of the agreement under the law;
- c. in the case of processing for the purpose of complying with our legal obligations - for a period of time resulting from generally applicable laws;
- d. in the case of processing on the basis of our legitimate interest - until such interest ceases to exist (e.g., the period of limitation for claims) or until you object - in situations where such an objection should be accepted in accordance with the law.

However, the data processing period may be extended where the processing is necessary to establish, exercise and defend any legal claims, or for the purpose of complying with accountability obligations for data processing, and after such time, only in the event and to the extent that this is required by law.

Who we share your data with

Entities processing data on our behalf

We share personal data with companies whose services we use to comply with our obligations to you or to conduct our business, in accordance with the purposes of the processing. Accordingly, your personal data that are required for the purpose in question may be shared with the following recipients:

- a. in the case of payments for our services - entities that act as intermediaries in processing payments, for the purposes of such service, banks;
- b. companies that provide us with technology solutions and services required to provide the functionality of our site;
- c. marketing, analytics and statistical service providers who help us understand what our customers are interested in and create offers, promotions, as well as personalize marketing, such as: Google Analytics, PostHog, Google Search Console, Google Ads, Facebook Ads, Looker Studio, Calendly, Highcharts, Postman, Sentry, Cloudflare, Amazon Web Services, viesapi;
- d. companies that conduct direct marketing on our behalf (e.g., sending emails) or provide other advertising services;
- e. companies that enable day-to-day customer service, such as: GetResponse, MailerLite, Postmark, SMSAPI, FirstPromoter, Hubspot, Intercom.com, Pipedrive.com - to operate the service;
- f. companies that provide accounting, legal, auditing, consulting or tax advisory services to us;
- g. providers of standard services related to the flow and storage of information - providers of hosting, e-mail, IT infrastructure, database maintenance and other IT services, e.g. Amazon Web Services, Cloudflare.

We also share your data with our authorized employees and associates.

Public authorities

We may also be required to share personal data with entities authorized to obtain them under applicable laws, such as law enforcement agencies and other public institutions.

Transfer of data outside the European Economic Area

Data in the Senuto Application and Site are processed in the European Economic Area. In the course of providing our services, we use third-party services and therefore your personal data may be transferred outside the European Economic Area. In the absence of a decision by the European Commission on the determination of an adequate level of personal data protection with respect to the United States, in order to adequately safeguard personal data, we use the Standard Contractual Clauses adopted by the European Commission referred to in Article 46(2) of the GDPR in our relationship with the aforementioned entities, and we have assessed the planned transfer of personal data to ensure compliance with the law. The Standard Contractual Clauses set out basic data safeguards, such as the obligation to process data in accordance with the data exporter's instructions and clauses, the obligation to suspend the transfer of data, the provision of technical and organizational safeguards, the obligation to notify requests for disclosure of personal data, the obligation to notify accidental or unauthorized access, and the obligation to provide inspection facilities.

In the exercise of our legitimate interest, we share the following categories of recipients the categories of data indicated below, for the purposes indicated below:

Categories of data recipients	Categories of data	Purpose of processing
providers of online services and tools, for: internal communications, customer service, data centre, applications that enable reports, advertisements, analysis, charts, visualizations and workshops or webinars, server hosting, billing for services provided, payment intermediation	internet traffic information and, depending on the category of data recipient: name, surname; company name, TIN, business address; position; e-mail address, telephone number; information about services purchased or ordered; bank account number, name of the bank that maintains the account, number, expiration date and CVC or CCV number of the payment card	Contacting customers and potential customers, internal information exchange, conducting workshops, webinars, meetings, e-mail contact, preparing reports and visualizations based on the available data, preparing advertising campaigns, keyword research, server hosting, data backup, data collection and storage, billing for services rendered, issuing VAT invoices, brokering payment for services, affiliate activities and CRM, sending ordered commercial information.

	provided; IP address, information about the device through which the site was visited	
electronic mail address (email)	e-mail address (User subscribing to the newsletter)	sending newsletter, sending ordered commercial information
marketing and advertising agencies	name, surname; company name, TIN, business address; position; e-mail address, telephone number	e-mail contact, sending ordered commercial information on the basis of previously given consent

You have the right to obtain a copy of your personal data transferred to a third country at any time.

Withdrawal of consent and objection to processing

Withdrawal of consent

To the extent that the processing is based on your consent, you may **withdraw such consent** at any time, without giving any reason. Withdrawal of consent does not affect the lawfulness of the processing based on the consent before its withdrawal.

However, please note that in some cases your consent is necessary to provide certain services or perform a transaction – of which we give you notice when collecting your consent. In such case, withdrawal of consent will make it impossible to provide such service or perform such activity.

Objection to data processing

You can also at any time:

- a. object to the processing of data for direct marketing purposes, including profiling, and
- b. object, on grounds relating to your particular situation, to the processing of data on the basis of our legitimate interest.

If you object to processing for direct marketing purposes, including profiling, we will no longer process your data for such purposes.

If you object on grounds relating to your particular situation to processing based on our legitimate interests, we will no longer process your data for the purposes of our legitimate interests, unless we demonstrate the existence of valid legitimate grounds for processing that override your interests, rights and freedoms, or grounds for establishing, exercising or defending legal claims.

Please note that if you object to the processing of your data for a specific purpose (e.g., for marketing), we will be able to continue to process your data for other purposes - such as performance of a contract, etc.

How you can withdraw consent or object

You can withdraw your consent or object by sending an e-mail to dane@senuto.com.

Your additional rights

Right to access the content of your personal data and to obtain a copy of your data

You have the right to obtain confirmation from the controller as to whether your personal data are being processed, and if they are, you are entitled to access them and the following information:

- a) the purpose of processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- d) where possible, the envisaged period for which the personal data will be retained, or, if not possible, the criteria used to determine such period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data pertaining to the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) information about automated decision-making, including profiling as referred to in Article 22(1) and (4) of the GDPR, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject - at the moment the Controller neither undertakes nor plans to undertake such activities.

You also have the right to request from us a copy of your personal data that we process.

Right to rectification

You have the right to request that we rectify any inaccurate personal data concerning you without undue delay. Taking into account the purposes of processing, insofar as this relates to your personal data, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Right to erasure – Right to be forgotten

You have the right to request from us the erasure of personal data concerning you without undue delay (“right to be forgotten”), and we are obliged to erase personal data without undue delay where one of the following grounds apply:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based in accordance with Article 6(1)(a) and there is no other legal ground for the processing;
- c) the data subject objects to the processing under Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing under Article 21(2) of the GDPR;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be deleted for compliance with a legal obligation under Union or Member State law to which the controller is subject;
- f) personal data were collected in connection with the offering of information society services, as referred to in Article 8(1) of the GDPR.

However, we reserve the right to refuse to delete personal data if they are required to be retained for the purpose of exercising legal claims or if required by applicable laws.

Right to restriction of processing

In the following cases, you also have the right to request us to restrict the processing of your personal data:

- a) when you contest the accuracy of your personal data - for a period enabling us to verify the accuracy of the personal data;

- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- d) you have objected to processing under Article 21(1) of the GDPR - pending the verification whether the legitimate grounds of the controller override those of the data subject.

Right to portability

You have the right to receive from us the personal data provided to us in a structured, commonly used machine-readable format, and you have the right to transmit those data to another controller without hindrance from us if:

- a) the processing is based on consent pursuant to Article 6(1)(a) of the GDPR or on a contract pursuant to Article 6(1)(b) of the GDPR; and
- b) the processing is carried out by automated means.

At the same time, you have the right to request that your personal data be transmitted by us directly to another controller, where technically feasible.

How to exercise additional rights

You can withdraw your consent or object by sending an e-mail to dane@senuto.com.

The exercise of these rights is free of charge. However, if the data subject's requests are manifestly unfounded or excessive, particularly because of their repetitive character (e.g., unreasonable, repetitive requests for information), then we may charge a reasonable fee for providing the information or communication, or taking the action requested, taking into account administrative costs, as well as refuse to act on the request.

We stipulate that the exercise of the rights described above may require verification of your identity. If we fail to successfully verify your identity, we may refuse to act on your request.

We will provide you with information about the steps taken on your request within one month of receiving the request. If necessary, we may extend this deadline for another two months if the request is complex or if there are numerous requests. In such case,

we will inform you within one month of receiving your request of such an extension and provide the reasons for the delay.

Right to lodge a complaint with the supervisory authority

If, in your opinion, we have violated your rights in connection with the processing of your personal data, you have the right to lodge a complaint directly with the supervisory authority, i.e. the President of the Office for Personal Data Protection, ul. Stawki 2, 00-193 Warsaw. In your complaint, you should describe the situation and indicate what action you consider to have violated your rights or freedoms. The complaint should be submitted directly to the supervisory authority.

Voluntary provision of data

Provision of data is voluntary but may be necessary for some purposes - for example, to enter into an agreement and create an account on the Site. Provision of data and consent for marketing purposes is voluntary.

In the case of data processing for the purpose of fulfilling our legal obligations, the provision of personal data is a statutory requirement.

In the case of processing based on our legitimate interests, the provision of personal data is voluntary, but necessary for the purposes of our legitimate interests.

Age

The Site is not designed or intended for individuals under the age of eighteen. We do not provide for the intentional collection of data, concerning individuals under the age of eighteen.

In the event that we obtain information that a user of the Site is under the age of eighteen, we will take appropriate steps to remove such user's information from the database and restrict such user's future access to the service.

Cookies and similar technologies

What cookies are

Our Site and Application use cookies. Cookies are IT data, in particular text files, commonly used on the Internet, stored on your final device used for browsing the Internet (e.g. computer, smartphone, tablet).

The information contained in cookies can be read by our computer system or third-party systems. Cookies are used to collect information about your use of the Site and the Application - for example, by remembering your visits to the Site and the activities you perform on the Site.

Information, including personal data, obtained in connection with the use of cookies on the Site and Application is processed by us and may be processed by our partners (hereinafter “**partners**”).

What cookies we use

The Site and Application use the following types of cookies:

- a. essential cookies – they are used to ensure proper operation of the Site and the Application, in particular the ability to navigate the Site and the Application and use their basic functions. They are necessary for the operation of the Site and the Application and cannot be disabled, as disabling them would prevent the Site and the Application from working;
- b. functional cookies – they are used to “remember” the settings you have chosen and to personalize the Site and the Application and the functionalities available within them;
- c. analytical cookies – they are used to improve the performance of the Site and the Application and to collect information and create statistics about how you use the Site and Application, to improve the Site and Application, to customize the operation of the Site and the Application to your preferences, and to create statistics on the use of the Site and the Application. The information collected in this way may be shared with our partners we cooperate with, if you consent;
- d. advertising cookies – they are used for marketing purposes, such as personalizing ads and content based on your interests, measuring the performance of ads and content, and gaining insights into the audiences who have seen ads and content. The information collected in this way may be shared with our partners we cooperate with, if you consent;

We use both session cookies and persistent cookies. Session cookies are stored on the device and remain there until the session of a particular browser ends. The stored information is then permanently deleted from the device’s memory. Persistent cookies, on the other hand, are stored on the device for the time specified in the parameters of the cookies or until they are deleted - this can be from 1 day to several years, depending on the type and function of the cookie in question. Ending the session of a particular browser or shutting down the device does not remove them from the device.

We use both first-party cookies, i.e. our own cookies, and third-party cookies, i.e. cookies that come from third parties that are our partners. The cookies we use take the forms of HTTP, HTML, PIXEL, INDEXED_DB,

First-party cookies are used to handle registration and login, maintain navigation parameters, monitor traffic on the Site and the use of the Site by Users, improve the presentation of content on the Site and personalize Site content, handle forms, match Site content to the preferences of a given user, ensure proper operation of the Site and its functionality, detect errors and abuse, as well as for statistical, analytical and marketing purposes.

Third-party cookies are set by web servers of sites other than the Site and the Application. Third-party cookies are used for functional, content personalization, statistical, analytical and marketing purposes.

Below you will find detailed information about the providers of cookies and their types (essential, functional, analytical or advertising), taking into account the definitions of the types of cookies presented above:

Cookie provider	Cookie type
Senuto.com	essential
Senuto.com	optional (functional)
Senuto.com	optional (analytical)
Senuto.com	optional (advertising)
Usercentrics / Cookiebot (cookiebot.com)	essential
Facebook.com (Meta Pixel)	optional (advertising)
Intercom.com	optional (advertising)
Intercom.com	optional (functional)

Calendly.com	essential
Calendly.com	optional (analytical)
Cloudflare	essential
Stripe.com (via Calendly widget)	essential
Stripe.com (via Calendly widget)	optional (functional)
Google.com	essential
Google.com	optional (analytical)
Google.com	optional (advertising)
Highcharts.com	essential
Youtube.com	optional (advertising)
posthog.com	optional (analytical)

Consent to the use of cookies

Cookies are used on the Site and the Application on the basis of consent given by selecting the appropriate option when using the Site and the Application, adjusting cookie choices via the Cookie Settings panel, or by configuring browser settings accordingly. Giving consent to use cookies is voluntary.

Before giving your consent to the use of cookies, you are informed about the purposes of using cookies and the possibility to change your cookie settings at any time.

You can withdraw your previously given consent to the use of cookies and make changes to your cookie settings at any time through the Cookie Settings panel, as well as delete cookies from the memory of your device.

How you disable or delete cookies in your browser settings

In many cases, your web browsing software (web browser) allows cookies to be stored by default on the device you use to connect to the Site.

You can change your browser's cookie settings at any time. For example, it is possible to configure your web browser to prevent or limit the storage of cookies on your terminal device. You can change the configuration using the settings of your web browser. Depending on your Internet browser, these settings can be changed, for example, to block automatic handling of cookies or to inform you each time cookies are placed on your terminal device.

You can also delete cookies after they are stored on your terminal device by using the appropriate functions of your web browser.

Detailed instructions on how to prevent cookies from being stored, as well as how to delete stored cookies, can be found on the web browsers' support pages or the respective browsers' instructions for use.

In order for us to permanently remember your decision not to allow us to use cookies for the purposes described above, we are required to store a cookie on your device that stores such information. Unless allowed by your device settings, it will be natural to ask you for consent each time.

If you do not want to receive cookies, you should use the option of the Internet browser used to connect to the Sites and select the automatic rejection option. These settings usually also allow you to manage cookies.

The above remarks about web browsers also apply to other programs used for web browsing.

Individual browsers

You can at any time change the settings for cookies used on the Site in your browser settings. Below you will find links to sample official websites of the manufacturers of the most commonly used web browsers, where you will find information on the steps needed to change the settings of a particular browser to the extent described above:

Internet Explorer, Windows 10:

<https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies>

Mozilla Firefox:

<http://support.mozilla.org/pl/kb/ciasteczka>

Google Chrome:

<http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>

Opera:

<http://help.opera.com/Windows/12.10/pl/cookies.html>

Safari:

<https://support.apple.com/pl-pl/guide/safari/sfri11471/mac>

Key tools used by our partners

Google Analytics

We use the Google Analytics tool provided by Google LLC ("**Google**") based in the United States. This is a web analytics service that is performed by Google (Google is the data processor here) on our behalf using cookies. Information produced by cookies about your use of the Site which is described here: <https://policies.google.com/privacy?hl=pl>, are transferred to and stored on a Google server in the USA. We have activated IP address anonymization, which truncates the IP addresses of Google users in advance. Only exceptionally will the full IP address be transmitted to a Google server in the US and truncated there. Anonymization occurs immediately after receiving the data, even before they are saved. On our behalf, Google will use the information obtained to verify your use of our services, to create reports on their functionality and to provide additional services to us related to the use of digital services or the Internet, in particular Google Analytics reports on the services provided by demographics and interests. The IP address provided by your browser within Google Analytics will not be combined with other Google data.

You can prevent Google from storing data that have been obtained by means of cookies and data (including your IP address) related to your use of the website, as well as prevent Google from processing such data by downloading and installing the browser plug-in available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=pl>.

Pixel Meta

We use the Pixel Meta tool to measure the effectiveness of advertising our Site via the Facebook platform and to optimize our ads that appear there. This is a tool that helps us measure the effectiveness of advertisements based on analysis of the actions taken by users on our Sites. We use the pixel data to the following extent:

- broadcasting ads to the right audience,
- creating groups of advertising recipients,
- analysing what happened as a result of clicking on an ad,
- using other Facebook advertising tools.

Information about the data collected by Facebook can be found here: <https://www.facebook.com/business/gdpr#faq>, under “What data does the pixel collect?”.

Facebook Ads

We use this tool to target and display Facebook ads to people who have not yet visited our Site on their device. In addition, we use this tool to target and display remarketing ads to people who have already visited our Site on their device.

For more information, click here: <https://www.facebook.com/business/tools/facebook-ads>.

PostHog

With the help of this tool, we perform product analytics, allowing us to analyze the activities performed by individual users of the application in areas such as the choice of payment currency, the profit generated on the Site overall, the current Package the user is using and the country the user is from; this tool also allows us to collect information about clicks, accesses to selected tabs and subpages and other activities the user performs within the Senuto Site and Application. This tool also allows us to record your screen on the Site and Application and your mouse movements (while obscuring any sensitive data, passwords) for the purpose of improving the Site and Application. We assure you that a limited number of people operating the Site and Application will have access to such data.

You can find more information here: <https://posthog.com/docs/privacy>

Google Ads, Google Search Console, Looker Studio (formerly Google Data Studio)

We use these tools to target and display ads to people who have not yet visited our Site on their device. In addition, we use this tool to target and display remarketing ads to people who have already visited our Site on their device.

In addition, we also use them to analyse the display of our Site in Google search, quantitative analysis of traffic on the Site and our Application and its segmentation, and analysis of users' click patterns on elements on the Site or the Application.

In addition, we use them to create internal analytical reports

For more information, click here:

<https://policies.google.com/technologies/ads?hl=pl>

https://support.google.com/adwords/answer/93148?hl=pl&ref_topic=3119146

You can prevent data that have been obtained by means of cookies and data (including your IP address) related to your use of the website from being stored by Google, as well as prevent Google from processing such data by changing the settings available at the following link:

<https://adssettings.google.com/authenticated?hl=pl>

Amendments to the Privacy Policy

This Policy is verified on an as-necessary basis and updated, if necessary.

This Website Privacy Policy takes effect as of 23.08.2023.