

PRIVACY POLICY

SEMHOUSE LIMITED LIABILITY COMPANY

1. General provisions

- 1.1 The controller of personal data of persons using the website semhouse.com and all its sub-sites (hereinafter: the *Website*) within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons in relation to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter: *GDPR*) is SEMHOUSE Spółka z ograniczoną odpowiedzialnością with its registered office in Warsaw at ul. Złota 61/101, 00-819 Warsaw, entered in the Register of Entrepreneurs 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 KRS number: 0001063860, NIP: 527-308-03-25, REGON: 526677066 (hereinafter: *Controller*).
- 1.2 The Controller can be contacted at the following email address: gdpr@semhouse.com.
- 1.3 This Privacy Policy applies to each person visiting and using the Website (hereinafter: *User*).
- 1.4 The Controller informs that all content available on the Website is protected by law, including copyright or trademark protection rights, and may not be used in any way without the Controller's prior written consent under pain of invalidity, with the exception of permitted personal use of works within the meaning of the Act on Copyright and Related Rights of 4 February 1994.
- 1.5 Any action beyond the above-mentioned permitted use is not permitted and may result in civil and criminal liability.
- 1.6 The Controller endeavours to protect the privacy of the Users, in particular by applying all precautions required by law to protect the Users' data against loss, destruction, disclosure, access by unauthorised persons and misuse. Also, Users by appropriate actions may contribute to the security of their data, including personal data on the Internet (e.g. by changing the access password frequently, using combinations of letters and numbers).
- 1.7 It is up to each User to decide whether or not to exercise his or her rights (see section 5 below) to control the processing of his or her data. Exercising rights that lead to preventing the Controller from processing personal data to the extent that they are necessary for the provision of the service by the Controller is tantamount to opting out of the service in question.
- 1.8 The Controller is not responsible for the privacy practices of websites to which the User is redirected by clicking on links on the Website.
- 1.9 The Controller reserves the right to amend this Privacy Policy in order to keep it up to date.
- 1.10 If you do not agree with this Privacy Policy, please do not use the Service.

2. Processing of personal data, purposes of data processing, legal grounds for data processing

- 2.1 The Controller obtains personal data of Users visiting the Website directly from the data subjects.
- 2.2 Personal data is obtained by automated means. Below you can find the categories of personal data that the Controller processes:

Data subject	Type of personal data	Processing purposes	Legal basis for processing
User visiting the Service	internet traffic information	performance of the Controller's legal obligations	Article 6(1)(c) GDPR
	essential cookies	operation of the Service	Article 6(1)(f) GDPR
	other cookies	see point 7 below	Article 6(1)(a) GDPR
	e-mail address, name, company, telephone number (if applicable)	dispatch of newsletters, sending of requested commercial information, contact for direct marketing purposes using automated calling systems	Article 6(1)(a) GDPR

- 2.3 Personal data of Users subscribing to the newsletter available in the Knowledge Base bookmark are processed for the purpose of direct marketing of the Controller and entities interested in marketing their own goods or services - sending the Users commercial information related to the Website, with new content available through the Website and commercial information on conferences and trainings related to the Knowledge Base bookmark - the basis of processing is the User's explicit consent. If the User does not give his/her consent, the Controller will not process the User's data for marketing purposes.
- 2.4 The newsletter service referred to in point 2.3 is activated by means of the form available on the Website, and then after clicking on the link sent to the e-mail address provided by the User when subscribing. The legal basis for the processing of this data is the User's consent, whereby the User may at any time withdraw the consent previously given and resign from this service with immediate effect by submitting an appropriate request to the Controller. In each of the messages sent by the Controller as part of the newsletter service, there is a link enabling termination of the service in such a manner (**opt-out option**). The Controller confirms both the commencement and termination of the newsletter service by appropriate messages sent to the e-mail address provided by the User.
- 2.5 The User, in accordance with his/her preferences, may also expressly consent to the sending of commercial information for direct marketing of the services or goods offered by the Controller by means of electronic communication, in particular by e-mail, and to be contacted for direct marketing purposes by means of automated calling systems.

3. Transfer of personal data and recipients

- 3.1 In the exercise of the Controller's legitimate interest, the Controller shall communicate the following categories of data to the following recipients, for the purposes indicated below:

Data subject	Recipients of data	Data category	Purpose of the transfer
	Internet service providers, data centres	internet traffic information	server hosting, data backup
	electronic mail service providers (e-mail)	e-mail address (user subscribing to the newsletter)	dispatch of a newsletter, dispatch of requested commercial information

Data subject	Recipients of data	Data category	Purpose of the transfer
User visiting the Service	administrative authorities, ordinary courts, state authorities	information and data which the Controller is obliged to disclose under the provisions of the law	performance of a legal obligation incumbent on the Controller

4. Storage of personal data

- 4.1 Users' personal data will be stored until the User exercises his/her rights leading to the cessation of the processing of his/her personal data (see section 5 below), revocation of the User's consent to the processing (if the processing is carried out solely on the basis of consent), unsubscribing from the newsletter service by using opt-out option
- 4.2 In the event of an existing or potential legal dispute between the User and the Controller, as well as in the event of the existence of a legitimate obligation of the Controller, the Controller may continue to store such personal data as will be strictly necessary for the Controller to protect and/or exercise its rights or fulfil its obligations.

5. Rights of Service Users

- 5.1 The User has the right to obtain from the Controller confirmation as to whether or not personal data concerning him or her is being processed and, if this is the case, he or she is entitled to access it and the following information:
- the purpose of the processing;
 - categories of personal data concerned;
 - information on 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 organisations;
 - as far as possible, the intended period of retention of personal data, and, where this is not possible, the criteria for determining this period;
 - information on the right to request from the controller the rectification, erasure or restriction of the processing of personal data concerning the data subject, and to object to such processing;
 - information on the right to lodge a complaint with a supervisory authority;
 - information on automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR, and relevant information on the modalities of such decision-making, as well as on the significance and envisaged consequences of such processing for the data subject- at present, the Controller does not undertake and does not plan to undertake this type of action
- 5.2 The user has the right to request the Controller to rectify without delay personal data concerning him or her that is inaccurate. Taking into account the purposes of the processing, the data subject has the right to request the completion of incomplete personal data, including by providing an additional statement.
- 5.3 You have the right to request from the Controller the immediate deletion of personal data concerning you ("right to be forgotten"), and the Controller is obliged to delete personal data without undue delay if one of the following circumstances applies:
- personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
 - data subject has withdrawn the consent on which the processing is based in accordance with Article 6(1)(a) and there is no other legal basis for
 - the data subject objects under Article 21(1) GDPR to the processing and there are no overriding legitimate grounds for the processing, or the data subject objects under Article 21(2) GDPR to the processing;
 - personal data were processed unlawfully;

- e. personal data must be erased in order to comply with a legal obligation under European Union law or the law of a Member State to which the Controller is subject;
- f. personal data was collected in connection with the offering of information society services, as referred to in Article 8(1) of the GDPR.

The Controller reserves the right to refuse to delete User data if their retention is necessary for the purpose of settling claims or if required by applicable law.

- 5.4 The data subject has the right to request the Controller to restrict processing in the following cases:
 - a. The user questions the correctness of the personal data - for a period of time allowing the Controller to check the correctness of the data;
 - b. processing is unlawful and the user, objects to the erasure of the personal data, requesting instead the restriction of its use;
 - c. The controller no longer needs the personal data for the purposes of the processing, but they are needed by the user to establish, assert or defend a claim
 - d. The user has raised an objection under Article 21(1) GDPR to the processing - until such time as it is determined whether the legitimate grounds on the part of the Controller override the grounds of the data subject's objection.
- 5.5 The data subject shall have the right to receive in a structured, commonly used machine-readable format the personal data concerning him or her which he or she has provided to the Controller, and shall have the right to send that personal data to another controller without hindrance from the Controller, if:
 - a. the processing is carried out on the basis of consent pursuant to Article 6(1)(a) of the GDPR or on the basis of a contract pursuant to Article 6(1)(b) of the GDPR; and
 - b. processing is carried out by automated means.
- 5.6 You have the right to request that the personal data be sent by the Controller directly to another controller, insofar as this is technically possible.
- 5.7 You have the right to object at any time to the processing of your personal data for the purposes of the Controller's direct marketing, including profiling, to the extent that the processing is related to such direct marketing.
- 5.8 The user has the right to lodge a complaint with the supervisory authority - the President of the Office for the Protection of Personal Data, ul. Stawki 2, 00-193 Warsaw.
- 5.9 Where the User's personal data is processed on the basis of consent, the User's consent may be withdrawn at any time. The withdrawal of consent shall not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.
- 5.10 Contact with the Controller on matters related to this Privacy Policy and the protection of personal data, including the exercise of the User's rights, is possible through the following communication channels:
 - e-mail: gdpr@semhouse.com;
 - postal address: ul. Złota 61/101, 00-819 Warsaw.

6. Analytical tools and advertising used

6.1 Google Analytics

The website uses Google Analytics, a tool provided by Google LLC (hereinafter: Google). Google Analytics uses its own cookies to track Users' interactions with other websites or applications. The data collected by Google Analytics is in principle collected anonymously and does not allow Users to be identified. The data collected by Google Analytics may include, for example: approximate

geolocation, demographic data, information about the device used, system, browser, screen resolution, language set, ISP, type of Internet connection, as well as User behaviour on the website.

Detailed information on the data collected by Google Analytics is described in the Google Analytics privacy policy available at:

https://support.google.com/analytics/topic/2919631?hl=pl&ref_topic=1008008.

6.2 **Google Ads**

The website uses the Google Ads tool, which is an advertising system that allows advertising messages to reach you through channels owned by Google. For example, Google Ads collects the following types of data: search queries entered in the Internet search engine, tracking data on User activity on other websites. As a general rule, the data collected by Google Ads does not identify you uniquely.

Detailed information on Google Ads is described in Google's privacy policy, available at: <https://policies.google.com/privacy>.

The user can independently opt out of tracking by Google Ads through the respective settings of his/her browser. For detailed information on how to opt-out of tracking by Google Ads, please follow the link:

<https://support.google.com/google-ads/answer/32050>.

6.3 **Remarketing**

The website uses the remarketing function offered by Google Analytics in combination with the Google Ads tool provided by

Remarketing is a way of conducting advertising activities on the Internet. Advertising activities are targeted at people who have visited the Website. Through the use of mechanisms based on cookies, the User's interest in a given product or service is determined, on the basis of which a specific marketing message is directed to the User. Marketing messages are displayed to the User when the User is using Google's search engine, browsing websites or as part of their presence on social networks.

Users can independently deactivate the remarketing option on the devices used via the deactivation option available under the link:

<https://www.google.com/settings/ads/onweb/>.

6.4 **Google privacy policy**

Detailed information on the principles of processing and protection of personal data processed by Google are described in Google's privacy policy, available at the following link:

<https://policies.google.com/privacy>.

6.5 **Facebook Pixel**

The Site uses the Facebook Pixel functionality provided by Meta Platforms Inc. The Facebook pixel is a short code placed on your website to measure the effectiveness of your ads based on analysis of your actions. The Facebook Pixel is used to target ads to the right audience, automatically configure marketing messages, and measure the performance of display ads.

Detailed information on the principles of processing and protection of personal data processed by Meta Platforms Inc. are described in Facebook's privacy policy, available at the following link:

<https://www.facebook.com/policy.php>.

7. Information on cookies

- 7.1 A cookie is a text file which, with the consent of Users, is stored by a website server on the User's computer or mobile device. Retrieving or reading the contents of such a cookie is only possible from the level of the website server concerned. Each cookie is unique to the User's web browser and contains anonymous information such as a unique identifier and the name of the website.
- 7.2 Cookies may also constitute personal data, to which the relevant provisions of this Privacy Policy apply.
- 7.3 The Controller uses cookies that are strictly necessary for the operation of the Website. The Controller uses the remaining cookies on the basis of the Users' consent. Below is information on the cookies used on our Website:

Cookie provider	Purpose for which cookies are used	Type of cookie
Controller	ensuring the security and the integrity of the Service	essential (compulsory)
Controller	statistical purposes, depicting the way the Website is used by Users, adapting and optimising the Website to the needs of Users, creating statistics on the number of users viewing the Website's pages	essential (compulsory)
Controller	analysis of the behaviour of User on the Website in order to adapt the services and content provided to the individual interests, requirements and needs of the User concerned	optional
Google LLC	analysis of User behaviour on the Website, advertising services, re-marketing, measurement services and analytical services	optional
Meta Platforms Inc.	advertising services, re-marketing, measurement and analysis services	optional
HotJar Ltd.	analysis of the behaviour of user on the Website	optional
HubSpot Inc.	Analysis of user behaviour on the Platform, analytical and measurement services, marketing, support of sales processes	optional
LinkedIn Corporation	advertising services, re-marketing, measurement and analysis services	optional
SEOptimer Limited	measurement and analysis services	optional

- 7.4 The entities that may install and use cookies within the Service on the basis of the User's consent are the Controller and:
- Google LLC, headquartered in Mountain View, California, United States. To learn more about this Controller's privacy policy click here: <https://policies.google.com/privacy>;
 - Facebook Inc. based in Menlo Park, California, United States. To learn more about this Controller's privacy policy, click here: <https://www.facebook.com/policy.php>;
 - HotJar Ltd, a private limited company registered under Maltese law. To find out more about this Controller's privacy policy, click here: <https://www.hotjar.com/legal/policies/privacy/>;
 - HubSpot Inc. based in Cambridge, Massachusetts, United States. To learn more about this Controller's privacy policy, click here: <https://legal.hubspot.com/privacy-policy>;

- e. LinkedIn Corporation, headquartered in Mountain View, California, United States. To learn more about this Controller's privacy policy click here: <https://www.linkedin.com/legal/privacy-policy>;
 - f. SEOptimer Limited based in Hong Kong. To learn more about this Controller's privacy policy click here: <https://www.seoptimizer.com/privacy-policy/>.
- 7.5 The Website uses session cookies, which are deleted when you stop using the Website and close your web browser window, as well as persistent cookies, which are stored on the devices through which you use the Website for a specific period of time or until they are deleted.
- 7.6 Data originating from cookies, will be stored depending on the type of cookies: (i) for the duration of the use of the Website (session files), (ii) until the User exercises his/her rights leading to the cessation of the processing of his/her personal data (see section 5 above), or (iii) until the User revokes his/her consent to their processing.
- 7.7 The User may, independently and at any time, change the settings concerning cookies, specifying the conditions for storing and accessing cookies on the User's device. The User may change the settings referred to in the previous sentence by means of the settings of his/her Internet browser or by means of the configuration of the service. These settings can be changed, in particular, in such a way as to block the automatic handling of cookies in the web browser settings or inform on their placement on the User's device each time. Detailed information on the possibility and methods of using cookies is available in the settings of your software (web browser).
- 7.8 **You can manage your consent to the processing of cookies at any time by clicking [HERE](#).**

8. Exclusion of liability

- 8.1 This Privacy Policy does not apply to services and companies whose contact details are provided on the Website.
- 8.2 Any announcements, advertisements or other similar content placed on the Website are of purely informative nature, do not constitute an offer within the meaning of the Civil Code and cannot constitute the basis for any claims against the Controller.

9. Final provisions

- 9.1 This Website Privacy Policy takes effect on 12.02.2024.