

PRIVACY POLICY

This Privacy Policy (hereinafter: "**Policy**") contains information on the processing of your personal data in connection with the use of the "Alibee" application, operating at the Internet address: www.alibee.ai (hereinafter: "**Application**").

Any capitalized terms not otherwise defined in the Policy shall have the meaning given to them in the Application terms and conditions, available at: <https://alibee.ai/termsandconditions> (hereinafter: "**Application Terms and Conditions**").

Personal data controller

The controller of your personal data is Radosław Czerski, conducting business activity under the name "Alibee Radosław Czerski" (address of the permanent place of business: Mortąg 18, 82-450 Mortąg), entered into the Central Registration and Information on Business kept by the minister in charge of economy, with NIP: 5792070360, REGON number: 366212879 (hereinafter: "**Controller**").

Contact with the Controller

In all matters related to the processing of personal data, you can contact the Controller by e-mail at: gdpr@alibee.ai

Personal data protection measures

The Controller applies modern organizational and technical safeguards to ensure the best possible protection of your personal data and guarantees that it processes them in accordance with the provisions of 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: "**GDPR**"), the Act of 10 May 2018 on the Protection of Personal Data and Other Personal Data Protection Regulations.

Information on the personal data processed

The use of the Application requires the processing of your personal data. Below you will find detailed information about the purposes and legal grounds of processing, as well as the period of processing and the obligation or voluntariness to provide them.

Purpose of processing	Personal data processed	Legal basis
Conclusion and performance of the Agreement	1) name and surname 2) company name 3) E-mail address 4) data saved on the account on an external website (if they are used to authenticate the Service Recipient's data)	Article 6(1)(b) of the GDPR (processing is necessary for the performance of an Agreement concluded with the data subject or to take steps to conclude it)
Providing the above-mentioned personal data is a condition for concluding and performing the Agreement (providing them is voluntary, but the consequence of not providing them will be the inability to conclude and perform the Agreement).		

The Controller will process the above-mentioned personal data until the statute of limitations for claims under the Agreement expires.

Purpose of processing	Personal data processed	Legal basis
Conclusion and performance of the Newsletter Delivery Agreement	E-mail address	Article 6(1)(b) of the GDPR (processing is necessary for the performance of the Newsletter Delivery Agreement concluded with the data subject or to take steps to conclude it) and Article 6(1)(f) of the GDPR (processing is necessary for the purpose of the legitimate interest of the Controller, in this case informing about new products and promotions available in the Application)
Providing the above-mentioned personal data is voluntary, but necessary to receive the Newsletter (the consequence of not providing it will be the inability to receive the Newsletter).		
The Controller will process the above-mentioned personal data until the effective objection is raised or the purpose of the processing is achieved, or until the claims under the Newsletter Delivery Agreement expire (whichever occurs first).		

Purpose of processing	Personal data processed	Legal basis
Email notifications	E-mail address	Article 6(1)(f) of the GDPR (processing is necessary for the purpose of pursuing the legitimate interest of the Controller, in this case informing the Service Recipients about the activities undertaken related to the performance of the Agreements concluded with the Service Recipients)
Providing the above-mentioned personal data is voluntary, but necessary to receive information about activities related to the performance of the Agreements concluded with the Service Recipients (the consequence of failure to provide them will be the inability to receive the above-mentioned information).		
The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of processing is achieved (whichever occurs first).		

Purpose of processing	Personal data processed	Legal basis
Handling requests for a demo version of the Application	1) E-mail address 2) other data contained in the message to the Controller	Article 6(1)(f) of the GDPR (processing is necessary for the purpose of the legitimate interest of the Controller, in this case responding to inquiries about the demo version of the Application)
<p>Providing the above-mentioned personal data is voluntary, but necessary to receive a response to the inquiry about the demo version of the Application (the consequence of not providing them will be the inability to receive a response).</p> <p>The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of processing is achieved (whichever occurs first).</p>		

Purpose of processing	Personal data processed	Legal basis
Handling inquiries (including inquiries submitted via the contact form)	1) name and surname 2) E-mail address 3) other data contained in the message to the Controller	Article 6(1)(f) of the GDPR (processing is necessary for the purpose of pursuing the legitimate interest of the Controller, in this case responding to the inquiry received)
<p>Providing the above-mentioned personal data is voluntary, but necessary to receive a response to the inquiry (the consequence of failure to provide them will be the inability to receive an answer).</p> <p>The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of processing is achieved (whichever occurs first).</p>		

Purpose of processing	Personal data processed	Legal basis
Conducting verification proceedings and dealing with appeals against decisions on the handling of Prohibited content	1) name and surname, 2) contact details, including email address	Article 6(1)(c) of the GDPR (processing is necessary for compliance with a legal obligation to which the Controller is subject, in this case the obligations of: <ul style="list-style-type: none"> – provide a mechanism for reporting unacceptable content (Article 16 of Regulation 2022/2065 on the Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act) (hereinafter: "DSA"),

		– consideration of complaints (Article 20 of the DSA).
<p>Providing the above-mentioned personal data is a condition for receiving a response to the application or exercising the Applicant's rights under the DSA regulations (their provision is voluntary, but the consequence of not providing them will be the inability to receive a response to the notification and the exercise of the above-mentioned rights).</p> <p>The Administrator will process the above-mentioned personal data for the duration of the complaint procedure, and in the case of exercising the above-mentioned rights of the Applicant – until they expire.</p>		

Purpose of processing	Personal data processed	Legal basis
Fulfilling tax obligations (m.in. issuing a VAT invoice, storing accounting documentation)	1) Name and surname/company 2) address of residence/registered office 3) TIN	Article 6(1)(c) of the GDPR (processing is necessary to comply with a legal obligation to which the Controller is subject, in this case obligations under tax law)
<p>Providing the above-mentioned personal data is voluntary, but necessary for the Controller to meet its tax obligations (the consequence of failure to provide them will be the Controller's inability to meet the above-mentioned obligations).</p> <p>The Controller will process the above-mentioned personal data for a period of 5 years from the end of the year in which the deadline for payment of tax for the previous year expired.</p>		

Purpose of processing	Personal data processed	Legal basis
Compliance with obligations related to the protection of personal data	1) name and surname 2) contact details provided by you (e-mail address; correspondence address; telephone number)	Article 6(1)(c) of the GDPR (processing is necessary to comply with a legal obligation to which the Controller is subject, in this case the obligations resulting from the provisions on the protection of personal data)
<p>Providing the above-mentioned personal data is voluntary, but necessary for the proper performance by the Controller of obligations resulting from the provisions on the protection of personal data, m.in. the exercise of the rights granted to you by the GDPR (the consequence of failure to provide the above-mentioned data will be the inability to properly exercise the above-mentioned rights).</p> <p>The Controller will process the above-mentioned personal data until the expiry of the limitation periods for claims for violation of personal data protection regulations.</p>		

Purpose of processing	Personal data processed	Legal basis
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Establishing, exercising or defending against legal claims	1) Name and surname/company 2) E-mail address 3) address of residence/registered office 4) PESEL number 5) TIN	Article 6(1)(f) of the GDPR (processing is necessary for the purpose of pursuing the legitimate interest of the Controller, in this case establishing, investigating or defending against claims that may arise in connection with the performance of the Agreements concluded with the Controller)
<p>Providing the above-mentioned personal data is voluntary, but necessary to establish, pursue or defend against claims that may arise in connection with the performance of the Agreements concluded with the Controller (the consequence of failure to provide the above-mentioned data will be the inability of the Controller to take the above-mentioned actions)</p> <p>The Controller will process the above-mentioned personal data until the expiry of the limitation periods for claims that may arise in connection with the performance of the Agreements concluded with the Controller.</p>		

Purpose of processing	Personal data processed	Legal basis
Analysis of your activity in the Application	1) date and time of the visit 2) IP number of the device 3) device operating system type 4) approximate location 5) type of web browser 6) time spent in the App 7) visited subpages and other actions taken within the Application	Article 6(1)(f) of the GDPR (processing is necessary for the purpose of the legitimate interest of the Controller, in this case obtaining information about your activity in the Application)
<p>Providing the above-mentioned personal data is voluntary, but necessary for the Controller to obtain information about your activity in the Application (the consequence of failure to provide them will be the Controller's inability to obtain the above-mentioned information).</p> <p>The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of the processing is achieved.</p>		

Purpose of processing	Personal data processed	Legal basis
Application administration	1) IP address 2) server date and time 3) Web browser information 4) Operating System Information The above data are saved automatically in the so-called server logs, each time the Application is used (it would not	Article 6(1)(f) of the GDPR (processing is necessary for the purpose of pursuing the legitimate interest of the Controller, in this case ensuring the proper operation of the Application)

	be possible to administer it without the use of server logs and automatic saving).	
<p>Providing the above-mentioned personal data is voluntary, but necessary to ensure the proper operation of the Application (the consequence of failure to provide them will be the inability to ensure the proper operation of the Application).</p> <p>The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of the processing is achieved.</p>		

Profiling

To create your profile for marketing purposes and direct marketing tailored to your preferences, the Controller will process your personal data in an automated manner, including profiling them – however, this will not have any legal effects on you or significantly affect your situation in a similar way.

The scope of profiled personal data corresponds to the scope indicated above regarding the analysis of your activity in the Application.

The legal basis for the processing of personal data for the above purpose is Article 6(1)(f) of the GDPR, according to which the Controller may process personal data to pursue its legitimate interest, in this case to conduct marketing activities tailored to the preferences of recipients. Providing the above-mentioned personal data is voluntary, but necessary to achieve the above-mentioned purpose (the consequence of not providing them will be the Controller's inability to conduct marketing activities tailored to the preferences of recipients).

The Controller will process personal data for the purpose of profiling them until an effective objection is raised or the purpose of processing is achieved.

Recipients of personal data

The recipients of personal data will be the following external entities cooperating with the Controller:

- a) hosting company;
- b) online payment system provider;
- c) data authentication system provider;
- d) companies providing tools for analyzing activity in the Application and directing direct marketing to its users (m.in. Google Analytics);
- e) accounting office.

In addition, personal data may also be transferred to public or private entities, if such an obligation results from generally applicable law, a final court judgment or a final administrative decision.

Transfer of personal data to a third country

In connection with the Controller's use of the services provided by Google LLC, your personal data may be transferred to the following third countries: Great Britain, Canada, USA, Chile, Brazil, Israel, Saudi Arabia, Qatar, India, China, South Korea, Japan, Singapore, Taiwan (Republic of China), Indonesia and Australia. The basis for the transfer of data to the above-mentioned third countries are:

- in the case of the United Kingdom, Canada, Israel, Japan and South Korea - a decision of the European Commission stating an adequate level of protection of personal data in each of the above-mentioned third countries;
- for the USA, Commission Implementing Decision (EU) 2023/1795 of 10 July 2023 pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council, determining the adequacy of the level of protection of personal data ensured by the EU-US data protection framework;
- in the case of Chile, Brazil, Saudi Arabia, Qatar, India, China, Singapore, Taiwan (Republic of China), Indonesia and Australia, adequacy contractual clauses in line with the standard contractual clauses set out in Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council.

You can obtain from the Controller a copy of the data transferred to a third country.

Permissions

In connection with the processing of personal data, you have the following rights:

- 1) the right to be informed what personal data concerning you is processed by the Controller and to receive a copy of this data (the so-called right of access). Issuing the first copy of the data is free of charge, for subsequent copies the Controller may charge a fee;
- 2) if the processed data becomes outdated or incomplete (or otherwise incorrect), you have the right to request its rectification;
- 3) in certain situations, you can ask the Controller to delete your personal data, e.g. when:
 - a) the data will no longer be needed by the Controller for the purposes of which it has informed;
 - b) you have effectively withdrawn your consent to the processing of data - unless the Controller has the right to process the data on another legal basis;
 - c) the processing is unlawful;
 - d) the need to delete the data results from a legal obligation to which the Controller is subject;
- 4) if personal data is processed by the Controller on the basis of the consent granted to the processing or in order to perform the Agreement concluded with him, you have the right to transfer your data to another Controller;
- 5) if personal data is processed by the Controller on the basis of your consent to the processing, you have the right to withdraw this consent at any time (the withdrawal of consent does not affect the lawfulness of the processing that was carried out on the basis of consent before its withdrawal);
- 6) if you believe that the processed personal data are incorrect, their processing is unlawful, or the Controller no longer needs certain data, you can request that for a specified period of time (e.g. checking the correctness of the data or pursuing claims) the Controller does not perform any operations on the data, but only stores them;
- 7) you have the right to object to the processing of personal data based on the legitimate interest of the Controller. In the event of an effective objection, the Controller will cease to process personal data for the above-mentioned purpose;
- 8) you have the right to lodge a complaint with the President of the Office for Personal Data Protection if you believe that the processing of personal data violates the provisions of the GDPR.

Cookies

1. The Controller informs that the Application uses "cookies" installed on your end device. These are small text files that can be read by the Controller's system, as well as by systems belonging to other entities whose services are used by the Controller.
2. The Controller uses cookies for the following purposes:
 - a) ensuring the proper operation of the Application – thanks to cookies, it is possible for the Application to operate efficiently, use its functions and conveniently move between individual subpages;
 - b) increasing the comfort of browsing the Application – thanks to cookies, it is possible to detect errors on some subpages and constantly improve them;
 - c) creating statistics – cookies are used to analyse the way the Service Recipients use the Application. This makes it possible to constantly improve the Application and adapt its operation to the preferences of the Service Recipients;
 - d) conducting marketing activities – thanks to cookies, the Controller can direct advertisements to Service Recipients tailored to their preferences.
3. Your Controller can place both permanent and temporary (session) files on your device. Session cookies are usually deleted when you close your browser, but closing your browser does not delete persistent cookies.
4. Detailed information about cookies used by the Controller is displayed in the panel located in the central part of the Application website. Depending on your decision, you can enable or disable cookies of categories (except for necessary cookies) and change these settings at any time.
5. The data collected by means of cookies do not allow the Controller to identify you.
6. Through most used browsers, you can check whether cookies have been installed on your end device, as well as delete installed cookies and block their installation in the future by the Application. However, disabling or limiting the use of cookies may cause quite serious difficulties in using the Application, e.g. in the form of the need to log in on each subpage, longer loading period of the Application page, restrictions in the use of certain functionalities.

Final provisions

To the extent not regulated by the Policy, the generally applicable provisions on the protection of personal data shall apply.

The policy is effective from 13.03.2025 r.