

# Security policy

## Data transmission encryption

Communication between the user and the Responso.com website is done using a secure, encrypted SSL protocol.

## Technical service

Service activities are performed immediately if any malfunction of the server or network infrastructure is detected.

## Backups

Twice a day all data entered into the system is backed up.

## System update

In the case of changes in external systems with which the system is integrated (e.g. Allegro.pl service), the application is adjusted to the current requirements of these services in an immediate manner so as to ensure continuous and correct operation of the system with as few interruptions as possible.

## Server security

The server that is used by the Responso system is located in a Data Center monitored 24 hours a day, 7 days a week. Only authorized administrators are allowed to operate servers. The server room is protected against fires, access by unauthorized persons and has a power supply independent of city power.

## Users' accounts

Each user's account is protected by a login and password. The password is stored in an encrypted form (hash) - if you lose your password, you can only set a new password. It is not possible to recover a password based on its encoded form.

## **Network data security**

Because all data is stored on our server, customers do not have to worry about theft or failure of their computer. In such cases, their data will be available immediately from another computer.

# **Privacy policy of the Website**

**<https://responso.com/> („Website”)**

## **DEAR USER!**

We are committed to protecting your privacy and want you to feel comfortable while using our services. This is why we would like to present you with the most important information on principles regarding the processing of your personal data and the cookies used by our Website. This information was prepared in compliance with the GDPR – the General Data Protection Regulation.

## **PERSONAL DATA CONTROLLER**

HelpRatchet spółka z ograniczoną odpowiedzialnością z siedzibą w Gdańsku, ul. Mariana Kołodzieja 55B/41, 80-180 wpisana do Krajowego Rejestru Sądowego – rejestru przedsiębiorców prowadzonego przez Sąd Rejonowy dla M. St. w Gdańsku, KRS 0000919366, NIP 5833435693, REGON 389833253, e-mail: [kontakt@responso.com](mailto:kontakt@responso.com);

If you would like to contact our Data Protection Officer, please send an email to: [kontakt@responso.com](mailto:kontakt@responso.com).

## **YOUR RIGHTS**

You have the right to:

access your personal data, including obtaining a copy of your data (Article 15 of the GDPR or if applicable - art. 13 (1) (f) of the GDPR),  
correct them (Article 16 of the GDPR),  
delete them (Article 17 of the GDPR),  
limit their processing (Article 18 of the GDPR),  
transfer data to another administrator (Article 20 of the GDPR).

Furthermore, you have the right to:

object to the processing of your data at any time:

- for reasons related to your particular situation – regarding the processing of your personal data in accordance with Article 6 (1) (f) of the GDPR (i.e. based on our legally justified interests), including profiling (Article 21 (1) of the GDPR);
- if personal data are processed for the purposes of direct marketing, including profiling, within the scope related to such direct marketing (Article 21 (2) GDPR).

Please contact us if you want to exercise your rights. Your objection to our use of cookies (about which you can read below) can be expressed, in particular, through the appropriate browser settings.

If you think that your data are processed unlawfully, you can submit a complaint to the President of the Personal Data Protection Office.

## **PERSONAL DATA AND PRIVACY**

We process your data for the purposes related to the functioning of the Website and the provision of the services it offers. You will find detailed information on the processing of your data depending on your activities in the table below.

### **1. USING FREE-OF-CHARGE SERVICES OFFERED ON THE WEBSITE**

**What for?**

performance of the contract for the provision of services within the Website

#### **On what basis?**

contract for the provision of services (Article 6 (1) (b) of the GDPR)

#### **For how long?**

for the duration of the contract

Furthermore, your data will be processed until the expiry of the period during which redressing is possible – by you or us (more information on this subject can be found in the last table of this section)

#### **What happens if I do not provide my data?**

you will not be able to use our services

## **2. USING PAID SERVICES OFFERED ON THE WEBSITE**

#### **What for?**

performance of the contract for the provision of services within the Website

#### **On what basis?**

contract for the provision of services (Article 6 (1) (b) of the GDPR)

our legal obligation to process your personal data (Article 6 (1) (c) of the GDPR)

#### **For how long?**

for the duration of the contract

until the legal obligation related to accounting ceases to apply

Furthermore, your data will be processed until the expiry of the period during which redressing is possible – by you or us (more information on this subject can be found in the last table of this section)

#### **What happens if I do not provide my data?**

you will not be able to use our services

### **3. CONTACTING US (E.G. MAKING AN INQUIRY)**

#### **What for?**

processing of your inquiries or submissions

#### **On what basis?**

contract or actions taken at your request to conclude it (Article 6 (1) (b) of the GDPR) – if your inquiry or notification concerns a contract that we are or may be a party to our legitimate interest in processing your data consisting in communicating with you (Article 6 (1) (f) of the GDPR) – if your inquiry or notification is not related to the contract

#### **For how long?**

for the duration of the contract binding us or, if the contract is not concluded – until the expiry of the redress period – see the last table in this section until the redress period expires or until we accept your objection to the processing \*

Furthermore, your data will be processed until the expiry of the period during which redressing is possible – by you or us (more information on this subject can be found in the last table of this section)

#### **What happens if I do not provide my data?**

we will not be able to respond to your inquiry or application

\* depending on whichever is applicable in that case and whichever takes place sooner.

### **4. BROWSER SETTINGS AND OTHER SIMILAR ACTIVITY ALLOWING FOR ANALYTICAL ACTIVITIES**

#### **What for?**

analysis of how you use and navigate the Website, to adapt it to the needs and behaviour of Users (for more information on that topic read the "Analytical Activities" and "Cookies" sections of the Privacy Policy)

#### **On what basis?**

our legitimate interest consisting in the processing of data for the purposes mentioned above (Article 6 (1) (f) of the GDPR)

#### **For how long?**

until the cookie validity expires or until you delete the analytical cookies \*

#### **What happens if I do not provide my data?**

we will not take your preferences regarding the use of the Website into consideration when developing it further

\* depending on whichever is applicable in that case and whichever takes place sooner.

## **5. BROWSER SETTINGS OR ANOTHER APPROXIMATE MARKETING ACTIVITY**

#### **What for?**

direct marketing, consisting of displaying personalized advertisements (you can read more about this in the "Profiling" and "Cookies" sections of the Privacy Policy).

#### **On what basis?**

our legitimate interest consisting in the processing of data for the purposes mentioned above (Article 6 (1) (f) of the GDPR)

#### **How long?**

until the cookie validity expires or until you delete the marketing cookies \*

#### **What happens if I do not provide my data?**

you will not receive any product or service suggestions that you may be interested in

\* depending on whichever is applicable in that case and whichever takes place sooner.

## **6. TAKING ACTION OR REFRAINING FROM TAKING ACTION WHICH MAY RESULT IN CLAIMS RELATED TO THE WEBSITE OR OUR SERVICES**

#### **What for?**

establishment, exercise or defence of legal claims related to the concluded contract or services provided

### **On what basis?**

our legitimate interest consisting in the processing of data for the purpose indicated above (Article 6 (1) (f) of the GDPR)

### **For how long?**

until the statute of limitation on claims expires or until we accept your objection to the processing \*

### **What happens if I do not provide my data?**

no possibility to establish, exercise or defend legal claims

## **PROFILING**

Within the Website, we conduct profiling activities – this takes place if you allow such activities (e.g. by properly adjusting your browser settings). This profiling is the automatic assessment of which products or services you may be interested in, using the information about the content you display. This way, advertisements for products or services displayed as part of the online services you use will be more tailored to you and your needs.

The conducted profiling does not result in decisions that have legal effects on you or similarly important impact

## **ANALYTICAL ACTIVITIES**

Within the Website, we conduct analytical activities aimed at increasing its intuitiveness and accessibility – this takes place if you allow such activities (e.g. by properly adjusting your browser settings). As part of the analyses, we will take the way you navigate the Website into consideration, for example, how much time you spend on a given subpage, or which places of the Website you click on. That way we can customise the layout and appearance of the Website and the content we post on it to the needs of Users.

## **DATA SAFETY**

While processing your personal data, we use organisational and technical measures which comply with the relevant provisions of law, including encrypting the connection with the use of an SSL certificate.

## **COOKIES**

This Website, like most Internet websites, uses the so-called cookies. These cookies:

- are stored in the memory of your device (computer, mobile phone, etc.);
- do not introduce any changes in the settings of your device.

On this Website, cookies are used for the purposes of:

- remembering your session,
- collecting statistical data,
- marketing,
- making the functions of the Website available.

To learn how to manage cookies and disable them in your browser, you can use your browser's help files. You can get more information about this topic if you press F1 while using the browser. Additionally, you can find relevant information on the following subpages, depending on the browser you use:

- [Firefox](#)
- [Chrome](#)
- [Safari](#)
- [Internet Explorer / Microsoft Edge](#)

Below you will find information about the features of the cookie files we process and their period of validity:

Cookie file name	Validity period	Explanation
__utma	24 months	This is one of the four main cookies set by Google Analytics, which allows for tracking visitor behaviour and measuring website performance. This cookie's lifetime is 2 years by default and distinguishes between Users and sessions.
__utmb	30 minutes	This is the second of the four main cookie files set by Google Analytics, which allows for tracking visitor behaviour and measuring website performance. This cookie file specifies new sessions and visits and expires after 30 minutes..
__utmc	Session	Set to enable interoperability with older versions of the Google Analytics code. This is a session cookie which is deleted when the User closes the browser.

__utmt	10 minutes	This cookie file is set by Google Analytics. According to its documentation, it is used to limit the bandwidth of the service – thus limiting data collection on high-traffic websites. It expires after 10 minutes.
__utmz	6 months	This cookie file identifies the source of website traffic – that way Google Analytics can tell website owners where individual site visitors came from. The cookie's lifetime is 6 months and is updated each time data is sent to Google Analytics.
_ga	24 months	Cookie file associated with Google Universal Analytics – which is an important update to the more frequently used Google Analytics service. This cookie file is used to distinguish unique Users by assigning a randomly generated number as a customer identifier. It is included in every page request on the website and is used to calculate visitor, session and campaign data for website analysis reports.

_gid	24 hours	Cookie file associated with Google Universal Analytics. The cookie's lifetime is 24 hours. It is used to distinguish Users.
_BEAMER_LAST_UPDATE_zeKLgqli17986	12 months	Cookie file associated with the Hotjar service and helps us to track events and the way Users move around the Service - you can read more about this in the "Analytical activities" section. In addition, the file can measure the performance and stability of the application.
ajs_user_id	12 months	Cookie file associated with the Hotjar service and helps us to track events and the way Users move around the Service - you can read more about this in the "Analytical activities" section. In addition, the file can measure the performance and stability of the application..
gcl_au	3 months	An advertising cookie from Google Ads collecting conversion data - allows us to determine how many times people who have clicked on

		ads have taken action on our website, such as registration.
fr	3 months	A basic cookie used in Facebook ads, applied to display, measure effectiveness and improve the relevance of ads.
spin	1 day	It collects information concerning, for instance, logging on to Facebook - this data may be used to adjust advertising tools to the user.
act	session	Used by Facebook for analytical and research purposes (understanding the way Facebook products are handled by users in order to indicate which parts of the service need to be improved).
c_user	365 days	Used together with the xs cookie to authenticate User identity on Facebook.

x-referer	session	Used by Facebook for analytical and research purposes (understanding the way Facebook products are handled by users in order to indicate which parts of the service need to be improved).
wd	1 week	A Facebook cookie that allows you to ensure the best possible results for your user screen..
dpr	1 week	A Facebook cookie that allows you to ensure the best possible results for your user screen.
_fbp	3 months	A Facebook cookie that identifies browsers for the purpose of providing advertising and site analysis services.
presence	session	A Facebook cookie used to enable features that help deliver Facebook products

sb	2 years	A Facebook cookie that identifies the browser for login and authentication purposes
datr	2 years	A Facebook cookie that identifies browsers for the purposes of site security and integrity, including account recovery and identification of potentially compromised accounts
m_pixel_ratio	session	A Facebook cookie used to provide users with optimal conditions for site use, including fast loading of Facebook products.
xs	1 year	Used together with the c_user cookie to authenticate user identity on Facebook.

By using the appropriate options of your browser, you can, at any time:

- delete cookies,
- block the use of cookies in the future.

In these cases, we will no longer process them..  
 More information on cookies is available on [Wikipedia](#).

## EXTERNAL SERVICES / DATA RECIPIENTS

We use the services of external entities which support us in running our business. We entrust them with the processing of your data – these entities process data only on our documented instructions.

Below you will find a list of recipients of your data:

Activity	Data receivers	Data transmission outside the European Union
every action related to the Website	hosting providers	does not take place
	entities cooperating on the basis of civil agreements, supporting our business activity	does not take place
using the Website with settings allowing for conducting analytical activities	entities providing statistics on the Website **	yes (United States of America) **
using the Website with settings allowing for conducting marketing activities	entities providing marketing on the Website **	yes (United States of America) **

In addition:

competent public authorities within the scope in which we are obliged to make data available to them.

## **TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION**

\*\* For the above reasons, your personal data may also be processed by entities outside the European Union. An adequate level of protection of data processing, including through the use of appropriate security measures is ensured by the application of the standard data protection clauses adopted by the European Commission referred to in Article 46(2)(c) of the GDPR.

Responso use and transfer to any other app of information received from Google APIs will adhere to [Google API Services User Data Policy](#), including the Limited Use requirements.