

CTHINGS.CO®

Privacy Policy

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1. Introduction

CTHINGS.CO respects your privacy and is dedicated to protecting the Personal Data it collects. The purpose of this Privacy Policy ("Policy") is to inform you about how we collect, use, and protect your personal information when you use our Services ("Services").

By using or accessing our Services including, without limitation, visiting our websites, applications, products, or otherwise providing your Personal Data to CTHINGS.CO, you accept and consent to the rights, obligations, and practices described in this Policy. If you do not agree to this Privacy Policy, please do not access the Site, or otherwise use the Services.

2. Who are we?

The data controller of your personal data, meaning the entity responsible for determining the purposes and methods of processing, is CTHINGS.CO Sp. z o.o. (hereinafter: CTHINGS.CO) with its registered office in Warsaw, Aleja Niepodległości 18 (postal code: 02-653). If you have any questions or concerns related to the processing of your personal data, you can also reach out to us via e-mail at: contact@cthings.co.

The Data Protection Officer of Controller can be contacted via e-mail: contact@cthings.co.

CTHINGS.CO handles personal data in compliance with the law, specifically Regulation (EU) 2016/679, known as the GDPR. This regulation safeguards the rights and privacy of individuals concerning their personal data and replaces Directive 95/46/EC.

3. What data do we collect?

CTHINGS.CO processes the following data when you use our Services:

- **Personal Identification Information:** your first and last name, e-mail address, telephone number.
- **Data About Your Company:** company name, address, website, phone number, e-mail address.
- **Device and Usage Information:** device information, browser type and version, geo-location information, computer and connection information, statistics on page views, traffic to and from Services, Internet Protocol (IP) address, standard web log information.
- **Information for Invoice and Shipping:** first and last name or company name, VAT number (if applicable), country, address, postcode.

Additionally, when purchasing access to the Services, we may require you to provide financial and billing information to our third-party payment processing service providers for invoice creation and payment processing.

4. How do we collect your data?

You directly provide CTHINGS.CO with most of the personal data we collect. We collect data and process data when you:

- Register online at our websites, applications, products, or Services.
- Enter information to our websites, applications, products, or Services.
- Communicate with us when you request information about our Services, chat with us, submit web forms, send e-mails, request customer or technical support, apply for a job or otherwise communicate with us.
- Contact us via telephone calls which may be recorded for training and operational purposes and CTHINGS.CO may enter information you provide via telephone into its systems to use for the purposes described in this paragraph.
- Elect to purchase Services online using a web form, CTHINGS.CO will use the information to establish your account.
- Provide consent for the dispatch of notifications or marketing content, including information about planned events and workshops, business-related updates, joining the event community, subscribing to our newsletter, or receiving eBooks and other information.

Providing data is necessary for entering into agreements, conducting business activities, and fulfilling CTHINGS.CO legal requirements. Failure in data provision may, depending on the specific case, prevent contract conclusion, access to selected Services, or full website functionality. In other cases, especially for the processing of data for marketing purposes, providing data is voluntary.

You must not provide CTHINGS.CO with personal data of third parties. If you intend to transfer data on behalf of third parties, ensure you obtain their explicit consent and provide a signed declaration confirming this consent to CTHINGS.CO.

5. How and why do we process your data?

CTHINGS.CO processes your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with Services to enter or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.

CTHINGS.CO processes your personal information for a variety of reasons, depending on how you interact with our Services, including:

- **Purpose:** Responding to inquiries through contact forms, including interactive windows on our website. **Legal Basis:** Article 6(1)(f) of the GDPR - Legitimate interests pursued by the controller or a third party. The legitimate interest is replying to inquiries sent using the contact form.
- **Purpose:** Sending marketing content, including event details, newsletters, and eBooks based on consent. **Legal Basis:** Article 6(1)(a) of the GDPR – Consent based on the data subject's consent.
- **Purpose:** Sending SaaS Platform Notifications. **Legal Basis:** Article 6(1)(b) of the GDPR - Necessary for or the performance of a contract to which the data subject is a party.
- **Purpose:** Recruitment and Talent Acquisition, including processing application documents. **Legal Basis:** Article 6(1)(b) of the GDPR - Necessary for pre-contractual steps.
- **Purpose:** Establishing contact for tailored offers of services and products. **Legal Basis:** Article 6(1)(b) of the GDPR - Necessary for pre-contractual steps.
- **Purpose:** Adapting and developing website functionalities, creating statistics, and maintaining service security and quality. **Legal Basis:** Article 6(1)(f) of the GDPR - Legitimate interest of the Controller. The legitimate interest is improving the security and quality of products and Services.
- **Purpose:** Investigating and safeguarding against potential claims. **Legal Basis:** Article 6(1)(f) of the GDPR - Legitimate interest of the Controller. The legitimate interest is protecting against fraudulent activities and service abuses.
- **Purpose:** Conducting statistical analysis to improve activities. **Legal Basis:** Article 6(1)(f) of the GDPR - Legitimate interests. The legitimate interest is to improve our marketing activities.
- **Purpose:** Processing service requests, handling orders, delivering products and services, processing payments, and communicating about orders and activities. **Legal Basis:** Article 6(1)(b) of the GDPR - Necessary for the performance of a contract.
- **Purpose:** Providing access to Services and Features. **Legal Basis:** Article 6(1)(b) of the GDPR - Necessary for the performance of a contract.
- **Purpose:** Quality Assurance and Service Improvement. **Legal Basis:** Article 6(1)(f) of the GDPR - Legitimate interests pursued by the Controller. The legitimate interest is improving the safety and quality of products and Services.
- **Purpose:** Preventing or detecting fraud or abuses of the Services. **Legal Basis:** Article 6(1)(f) of the GDPR - Legitimate interests pursued by the Controller. The legitimate interest is protecting against fraudulent activities and service abuses.
- **Purpose:** Enabling third parties to carry out technical, logistical, or other functions on our behalf. **Legal Basis:** Article 6(1)(b) or Article 6(1)(f) of the GDPR, depending on the specific third-party function or legitimate interests pursued by the Controller or a third party. The legitimate interest is efficiently utilizing third-party services to support business operations.

- **Purpose:** Cookies management. **Legal Basis:** Article 6(1)(f) of the GDPR - Legitimate interests pursued by the Controller. The legitimate interest is website management, conducting analytics, advertising, by the Controller.

6. How do we store your data?

CTHINGS.CO places fundamental emphasis on matters related to cybersecurity and privacy. Therefore, we protect collected Personal Data with reasonable safeguards against loss or theft, as well as against unauthorized access, disclosure, copying, use or modification. We protect the security of your information during transmission to or from our websites, applications, products, or Services by using cryptographic encryption protocols and software. We store your data on the Microsoft Azure servers located within the European Economic Area (EEA) and on Google Cloud Platform Poland.

Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You are solely responsible for keeping your virtual spaces secure. Make sure you follow the privacy rules and laws in all the places where you use your virtual space to handle personal information. CTHINGS.CO is not responsible if you don't protect personal information properly in your virtual space.

7. How long do we store your data?

CTHINGS.CO will only keep your personal data for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal data, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

8. Do we share or transfer your data?

Third party data transfer

CTHINGS.CO in order to conduct its business activities may share your personal information with the following groups of third parties:

- **Service Providers:** Personal information is shared with third-party service providers for various purposes, including IT services, information handling, customer service, and support for service provision.
- **Payment Processing Vendor (Applicable only to users of SaaS Platforms):** We use **Stripe** for payment, analytics, and other business services. Stripe collects and processes personal data, including identifying information about the devices that connect to its services. Stripe uses this information to operate and improve the services it provides to us, including for fraud detection and prevention. You can learn more about Stripe and its processing activities via privacy policy at [Stripe's Privacy Policy](#).
- **Notifications Processing Vendor (Applicable only to users of SaaS Platforms):** We use custom-built notification systems which are an integral part of our SaaS Platforms. We implemented it to ensure you stay informed and receive important updates, system maintenance alerts, account-related information, and other communications related to our services. To deliver e-mail messages generated by the notification system we are using SendGrid platform, provided by Twilio, Inc. To fulfill this process SendGrid has access to your e-mail address, your first name and last name. For detailed information about data collection, usage, and your privacy rights, please refer to Twilio's privacy policies, available at [Twilio Privacy Notice](#).
- **Business Partners:** Personal information may be provided to business partners with whom we jointly offer products or Services, and both company names will be disclosed.
- **Affiliates:** CTHINGS.CO shares personal information with its affiliated companies.
- **Advertising Partners:** CTHINGS.CO doesn't use personal information to advertise third-party products but may use it to market its own services through third-party platforms.
- **Merger, Sale, or Asset Transfers:** If CTHINGS.CO is involved in various business transactions, personal information may be sold or transferred as allowed by law and contracts.
- **Disclosures to Regulatory Agencies:** CTHINGS.CO may transfer personal data to law enforcement and other agencies as required by lawful processes or written consent. We may also disclose information to comply with legal obligations.
- **Disclosures to Protect Us or Others:** CTHINGS.CO may access, preserve, and disclose information to protect rights, property, safety, enforce policies, collect owed amounts, or assist in investigations.
- **Disclosures to Other Third Parties:** Information may be shared with other organizations for regulatory auditing, fraud prevention, and credit risk reduction. Third parties providing services to CTHINGS.CO must adhere to privacy protections.

Transfer of personal data to a third country or international organisation

Outside the European Economic Area (EEA), the level of personal data protection differs from that provided by European law (GDPR). CTHINGS.CO transfers your personal data outside the EEA to third

countries only if it is necessary to achieve business purposes (incl. the use of IT tools provided by third country entities) and when the third country ensures an adequate level of protection, through:

- issued a relevant decision of the European Commission regarding the assurance of an adequate level of protection of Personal Data in that country,
- the use of standard contractual clauses issued by the European Commission, if a given country does not have a confirmed decision of the European Commission,
- application of binding corporate rules approved by the competent supervisory authority.

You can request more details about these security measures and obtain copies of these agreements from by contacting us via e-mail: contact@cthings.co.

9. What are your data protection rights?

CTHINGS.CO would like to make sure you are fully aware of all your data protection rights. To reiterate, every user is entitled to the following:

The right to access - You control access to Personal Data maintained or stored by you via CTHINGS.CO's web-based interface for account management. You have the right to request CTHINGS.CO for copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right update your information at any time by using CTHINGS.CO's web-based interface for account management. You have the right to request that CTHINGS.CO correct any information you believe is inaccurate. You also have the right to request CTHINGS.CO to complete the information you believe is incomplete.

The right to erasure – You have the option to cancel your account at any time and you have the right to request that CTHINGS.CO erase your personal data, under certain conditions applicable by law.

The right to restrict processing – You have the right to request that CTHINGS.CO restrict the processing of your personal data, under certain conditions applicable by law.

The right to object to processing – You have the right to object to CTHINGS.CO's processing of your personal data, under certain conditions applicable by law.

The right to data portability – You have the right to request that CTHINGS.CO transfer the data that we have collected to another organization, or directly to you, under certain conditions applicable by law.

Individuals whose data is processed have the right to lodge a complaint with the supervisory authority, namely the President of the Personal Data Protection Office in Poland. For more information, please visit: <https://uodo.gov.pl/pl/83/155>.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us via e-mail: contact@cthings.co.

10. Do we collect sensitive information?

CTHINGS.CO does not intentionally collect or maintain sensitive information, such as medical or health conditions, race, ethnic origin, political opinions, religious beliefs, or other sensitive data. We request that you do not provide such information. If you host any material or information that is sensitive and subject to privacy laws or regulations, you are solely responsible for safeguarding it and ensuring compliance with applicable laws. CTHINGS.CO will not be held responsible for any sensitive information you store on our systems.

11. Do we collect information from minors?

CTHINGS.CO Services are not directed at children under 18 (or any other age as required by local law). We do not knowingly collect personal information from children under the age of 18. If You have reason to believe that a child under the age of 18 has provided Us with personal information, contact us. If we learn that we have collected any personal information in violation of applicable law, we will promptly take steps to delete such information from our databases.

12. Who is subject to this Policy?

CTHINGS.CO Privacy Policy is for you and your Covered Users which means anyone you invite to use our Services. You need to let these other users know about this Policy and agree to it on their behalf. If we make any changes to this Policy in the future, you will also need to inform them about those changes and make sure they agree to the updated Policy.

13. Do we use cookies?

CTHINGS.CO uses cookies. Cookies are small text files stored in the Web browser of your IT equipment when you visit our Websites. These cookies play an essential role in enhancing users browsing experience by helping us remember your preferences. Moreover, CTHINGS.CO utilizes cookies for service administration, conducting analytics, advertising, marketing, and enhancing website functionality.

Your consent is obligatory for Us to store your cookies, which You can change or withdraw your consent at any time.

Facebook Pixel

CTHINGS.CO uses Facebook Pixel, a tool provided by Facebook, Inc., which tracks and analyzes user interactions on our Websites for marketing and analytical purposes. The Facebook Pixel deploys cookies to collect data, which may include your IP address, and create user profiles. Your data may also be transmitted to the United States. Data transfers to the United States are ensured through standard contractual clauses or comparable protective measures. You can manage your cookie preferences in your browser settings. For comprehensive information on data processing, please review [Facebook's Data Policy](#).

Google Ads Conversion Tracking

CTHINGS.CO employs Google Ads Conversion Tracking - a service offered by Google LLC, which measures the effectiveness of our advertising campaigns. Google Ads Conversion Tracking utilizes cookies that track your interactions with our website and record conversions. Your IP address may be included in this data. Information collected is usually anonymized and aggregated. Data may be transmitted to Google's servers, including those in the United States, and is safeguarded through standard contractual clauses or equivalent safeguards. You can manage your cookie settings to opt out. For detailed insights into data processing, consult [Google's Privacy Policy](#).

Google Analytics

CTHINGS.CO utilizes Google Analytics, which is a web analysis service provided by Google LLC, that collects and evaluates data related to the use of our Websites. Google Analytics uses cookies that monitor users' interactions with our platforms. This data is utilized for analytical purposes and may encompass your IP address. Typically, this data is anonymized and aggregated. Information may be transmitted to Google's servers, including those situated in the United States. The transfer of data to the United States is protected by standard contractual agreements or other suitable mechanisms. If you wish to opt out of Google Analytics cookies, you can do so by enabling the [Google's Analytics opt-out browser add-on](#), for a comprehensive understanding of data collection, processing procedures, and your rights, please refer to [Google's Privacy Policy](#).

Google Tag Manager

CTHINGS.CO employs Google Tag Manager, is used for managing tags (markers) on the website through an interface and is provided by Google LLC, to streamline and organize various tags on our Websites, especially those for analytics and marketing. Google Tag Manager may deploy cookies to facilitate tag management. These cookies are used for administrative purposes and do not collect personal data. For more details on data processing, please refer to [Google's Privacy Policy](#).

HubSpot

CTHINGS.CO uses HubSpot. It is a marketing automation platform provided by HubSpot, Inc., that analyzes our Websites and enhances our marketing campaigns. HubSpot utilizes cookies to recognize

your browser and may collect and transmit data, including your IP address. Data may be pseudonymously used to create user profiles. Your data may also be transferred to the United States. Data transfers to the United States are carried out using standard contractual clauses or other suitable safeguards. You can prevent the storage of cookies by adjusting your browser settings; however, this may impact your experience on our website. For detailed information about data collection, usage, and your privacy rights, please refer to HubSpot's privacy policies available at [HubSpot Privacy Policy](#).

LinkedIn Insight Tag

CTHINGS.CO Websites incorporate the LinkedIn Insight Tag. It is a tool offered by LinkedIn Corporation that gathers data about visitors' interactions with our sites. The LinkedIn Insight Tag utilizes cookies to track your website activity and provide insights. Data such as your IP address may be collected by it. Data transmission to LinkedIn's servers, which may include servers in the United States, is secured through standard contractual clauses or similar safeguards. To learn more about data collection and your privacy choices, consult [LinkedIn's Privacy Policy](#).

14. Do we process data in an automated manner?

CTHINGS.CO uses cookies. This process involves the automated processing of personal data, such as browsing behavior, preferences, and interactions with our site, for various purposes, including enhancing user experience, providing personalized content, and improving CTHINGS.CO Services. By using this website, you consent to the automated processing of your data as described in this Privacy Policy. CTHINGS.CO uses third-party tools that are explained below.

15. Processing data for the purpose of sending a newsletter

CTHINGS.CO provides you with an option to join our newsletter. By subscribing to our newsletter, you enable us to send you emails that may include advertising, commercial, or marketing content. We use the third-party HubSpot platform for newsletter management, provided by HubSpot, Inc. You can join our newsletter recipient list by providing your email and granting your explicit consent. You can withdraw your consent to receive our newsletter at any time by using an unsubscribe link, which is included in every email you receive through HubSpot. For detailed information about data collection, usage, and your privacy rights, please refer to HubSpot's privacy policies, available at [HubSpot Privacy Policy](#).

16. Privacy policies of other websites

This Policy does not apply to any third-party websites, services, or applications, even if they are accessible through our Services. Our Privacy Policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

17. Changes to our Privacy Policy

CTHINGS.CO keeps its Privacy Policy under regular review and place any updates and changes to our Privacy Policy on this web page unless another type of notice is required by the applicable law. Changes to this Privacy Policy are effective when they are posted on this page.

18. How to contact us

If you have any questions about Our Company's Privacy Policy, the data we hold on to you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

E-mail: contact@cthings.co.

Registered Office: CTHINGS.CO Sp. z o.o., al. Niepodległości 18, 02-653 Warszawa, Polska.

Office Address: CTHINGS.CO Sp. z o.o., al. Niepodległości 18, 02-653 Warszawa, Polska.