

# CTHINGS.CO

# Privacy Policy

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## 1. Introduction

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Welcome to CTHINGS.CO ("we," "us," or "our") website and our ecosystem of software-as-a-service **CTHINGS.CO** respects customer privacy and is committed to protecting the personal information 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")** or otherwise interact with us and what rights you have in connection with it.

**When using our Services, including but not limited to visiting our websites, using our applications, products, or otherwise providing your personal data to CTHINGS.CO, you should first read this Policy. If you do not agree with the ways in which we process your personal data, please do not use the Site or other Services.**

CTHINGS.CO processes personal data in accordance with the law, in particular in accordance with Regulation (EU) 2016/679, known as GDPR. This regulation protects the rights and privacy of individuals in relation to their personal data and replaces Directive 95/46/EC.

In the Privacy Policy, when referring to "Services", this means subscription-based access to cloud platforms, web applications, hosting services, computing resources and other services offered by CTHINGS.CO, including, but not limited to, websites, applications, software, hardware, APIs, machines, devices, documentation and technologies made available to users as part of a specific set of services.

CTHINGS.CO attaches fundamental importance to issues related to cybersecurity and privacy. Therefore, we protect the collected personal data with appropriate security measures, including against loss, theft, unauthorized access, disclosure, copying, use or modification. We also protect the security of your data during transmission to our websites, applications, products or Services and back, using encryption protocols and software.

Azure servers located in the European Economic Area (EEA) and on Google Cloud Platform in Poland.

Although we make every effort to protect your personal data in accordance with GDPR requirements, remember to also take care of the security of your virtual spaces yourself. Make sure that you comply with the privacy, confidentiality, regulations and procedures in force in the places where you use such spaces, in particular that you do not share your passwords with third parties, use secure network access, protect your equipment from unauthorized access, etc.

CTHINGS.CO shall not be liable if the sole cause of damage is your failure to secure personal data in your virtual space.

### Who does this Policy apply to?

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If you use our services and also share them with your Users, in accordance with the scope of services provided to you, the CTHINGS.CO Privacy Policy also applies to your Users. You should inform these users about this Policy.

If we make changes to this Policy in the future, please inform those users of the changes.

## 2. Who are we and how to contact us?

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The administrator of your personal data, i.e. 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 at Al. Niepodległości 18, 02-653 Warsaw**. In case of any questions or doubts related to the processing of your personal data, you can contact us by correspondence - to the address of our registered office or via e-mail: [contact@cthings.co](mailto:contact@cthings.co)

Our Data Protection Officer (DPO) monitors compliance with GDPR regulations and can answer questions or concerns regarding the processing of your data.

**Contact details of the Data Protection Officer:** Tomasz Ochocki, e-mail: [iod@cthings.co](mailto:iod@cthings.co) . You can also contact the IOD by mail, to the address of the Administrator's registered office.

## 3. What data do we collect?

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Purposes, legal basis of processing, scope, source of data, information whether the provision of data is mandatory, data storage period, possible recipients.

We process different ranges of personal data and for different purposes – depending on the relationship you have with us. **Remember that you can act in more than one role, e.g. you can be both our client and the recipient of marketing activities. In such a situation, remember to read each part of the policy that applies to you.**

Most of the personal data we collect is provided to us directly by you. If we obtain it from sources other than you, the table below indicates the source of this data and its scope, and whether providing the data is mandatory. We also indicate the possible recipients of your data and the period for which it will be stored. We would like to point out that CTHINGS.CO stores your personal data only for as long as necessary for the purposes set out in this privacy policy, unless a longer storage period is required or permitted by law (e.g. for tax, accounting or other legal requirements) – we have also included information in this document.

When we no longer have a legitimate business need to process your personal data, we will delete or anonymize it, unless this is impossible (e.g. due to personal data being stored in backup archives - backup copies are deleted periodically, at least once every 3 months). In such a case, we will securely store your data and isolate it from further processing until it is possible to delete it. Personal data stored in backup copies will be securely isolated and deleted in accordance with the retention schedule when restoration is no longer necessary.

### User role 1: User pages

#### 1.1 Purposes, legal basis of processing, scope and source of data, information whether the provision of data is mandatory.

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**We collect and process your data when:**

- **You visit our website** (also as a non-logged-in user) – more information on processing can be found in the section on **cookies and tracking technologies** referred to below in this Policy.
- We process your data **for the purpose** of pursuing our legitimate interests, i.e. ensuring the functionality of the website and facilitating its use, analyzing the activities of logged-in or non-logged-in users (Article 6, paragraph 1, letter f of the GDPR), as well as for the purposes indicated in the content of consents – if such were expressed (Article 6, paragraph 1, letter a of the GDPR) and for the purpose of fulfilling legal obligations arising from the law, in particular the Electronic Communications Law (Article 6, paragraph 1, letter c of the GDPR).
- You use the functionalities provided by us (also as an unregistered user), e.g. contact forms, chats, interactive windows, etc. – we process your data in order to respond to the messages you send, which is considered as our legitimate interest (Article 6 paragraph 1 letter f of the GDPR, and if you are our client and correspondence is necessary for the performance of a contract to which you are a party or to take action at your request before concluding a contract – the legal basis for processing is Article 6 paragraph 1 letter b of the GDPR).
- **You register** online on our websites, applications, products or Services or when **you purchase Services online** using an online form (CTHINGS.CO will then use the information you provide to set up your account) – we process your data for the purpose of providing the account management service (Article 6, paragraph 1, letter b of the GDPR).
- If the processing of your data may give rise to claims, your data will be processed for the purposes of determining, pursuing or defending against claims, which constitutes our legitimate interest (Article 6 (1) (f) of the GDPR).
  - We also process your data for the purposes indicated in the content of consents, if such consents were expressed (Article 6, paragraph 1, letter a of the GDPR).

Providing data other than that those requested by the Administrator, or providing data marked as optional, is an explicit action that is equivalent to giving consent to the processing of personal data for the purposes for which they were provided.

#### Data scope:

- **Technical data:** IP address, device type and browser information to improve the security and performance of our services.
- Depending on the configuration of the account management service, these may include: first name, last name, e-mail address, telephone number, login and password, transaction history visible in the account, log of events related to the use of the account.

#### Data source:

We typically obtain data directly from you. Your personal data may also be obtained from another source, e.g. from our client – the company, if you are its employee or representative.

#### Obligation to provide data:

Providing data is not generally a statutory or contractual requirement but is necessary to achieve the purposes of processing. Providing some data may be necessary to conclude and later perform a contract – failure to provide such data will result in the inability to conclude a contract.

## 1.2 Data storage time

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**Data from cookies and tracking technologies** are stored for the time resulting from their operation – more information on this can be found in the section of the policy dedicated to cookies and tracking technologies.

**Technical data from system logs** (IP address, browser information, device type) – 12 months from the last visit to the website.

**If you use our forms available on the website or chat:** for a period of 2 years from the last communication within a given matter.

**In the scope of the account management service**, if you have an account on our website – personal data will be stored for the duration of the service, and then until the expiry of the limitation periods for claims arising from the implementation of this service.

**Registration data used for logging in** – until the user deletes the account, resigns from the service or after 3 years of inactivity.

**If you contact us by email**, we store your data for a period of 2 years from the last communication within a given matter.

**If the processing of your data may give rise to claims**, the data will be stored until the statute of limitations for such claims expires.

If we process specific data on the basis of the legitimate interest of the Controller (Article 6 paragraph 1 letter f of the GDPR) and you submit an effective objection to the processing before the expiry of the basic storage period, then the data will be processed for this specific purpose for a shorter period, i.e. until your objection is upheld.

If we process certain data based on your consent (Article 6, paragraph 1, letter a of the GDPR) and you withdraw your consent before the expiry of the basic storage period, the data will be processed for this specific purpose for a shorter period, i.e. until you withdraw your consent.

## 1.3 Recipients of your data

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**The recipients of your data may be:**

- **our service providers**, in particular entities that provide IT tools for processing your data, tracking technologies or entities that have access to your data as part of service work carried out on IT systems,
- companies recycling or archiving documents and other media, entities auditing our activities,
- entities providing us with legal assistance,
- state authorities or other entities authorized under the regulations, if it is necessary to fulfill the legal obligations of the Administrator.

**Advertising Partners:** CTHINGS.CO does not use your personal information to advertise third party products but may use it to promote its own services through external platforms.

**Other Third Parties:** Information may be shared with other organizations for the purposes of regulatory audits, fraud prevention and credit risk reduction.

## User role 2: The client and potential client of CTHINGS.CO, their representatives, employees and associates

### 2.1 Purposes, legal basis of processing, scope and source of data, information whether the provision of data is mandatory.

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We collect and process your data for the purpose of:

- **To perform a contract or take action before entering into a contract**, at the client's request, expressed in any manner, e.g. by filling out a contact form on the website (Article 6 paragraph 1 letter b of the GDPR – if you are a client; Article 6 paragraph 1 letter f of the GDPR – if you are a natural person acting in the name of or on behalf of the client), i.e., among others, for the purpose of handling and fulfilling orders for services or delivering products, processing payments, delivering a service or goods, communicating on orders and activities, providing access to services and functions, sending notifications in the SaaS platform.  
  
Please also note that when purchasing access to the Services, you may be required to provide financial and billing information to our third-party payment service providers in order to issue invoices and process payments.
- **Fulfillment of obligations arising from legal provisions**, in particular tax and accounting provisions (Article 6, paragraph 1, letter c of the GDPR).
- **Determining, pursuing or defending against claims**, which constitutes our legitimate interest (Article 6, paragraph 1, letter f of the GDPR).
- **Documenting the content of meetings - business**, operational and sales arrangements and activities, which constitutes the legitimate interest of the Controller (Article 6 paragraph 1 letter f of the GDPR).
- **In the purposes indicated in the content of the consents** to the processing of personal data, if such consents were expressed (Article 6, paragraph 1, letter a of the GDPR).

Providing data other than that requested by the Administrator or providing data marked as optional is an explicit action that is equivalent to consenting to the processing of personal data for the purposes for which they were provided.

#### Data scope:

Before entering into an agreement with a client, we obtain the data necessary to present an offer. Which are usually:

- **Basic identification and contact data:** name and surname, e-mail address, telephone number, position, place of work.
- **Data about your company:** company name, registered office address, website, telephone number, e-mail address.

At the stage of concluding the contract, we may also obtain the PESEL number or identity card number – for identification purposes.

In connection with the implementation of meeting transcriptions, we process your voice and personal data that appear in conversations during the meetings to which the transcript relates.

During the term of the contract, we obtain or process further data, such as:

- **Billing information:** account number, VAT number (if applicable).
- **Technical data:** IP address, device type and browser information, to improve the security and performance of our services.
- Data on **concluded transactions** or, in general, **the history of cooperation**, including the results of **satisfaction surveys**.

#### Data source:

If our client is an institution, e.g. a commercial law company, we process personal data of persons acting on its behalf, e.g. the president, proxy or contact persons for the implementation of the contract. If we did not obtain this data directly from you, then their source was our client.

Sometimes we obtain personal data from public sources, e.g. the client's website or from so-called business intelligence agencies, if we want to verify the client before establishing cooperation with him.

#### Obligation to provide data:

Providing some data is necessary for the conclusion and subsequent performance of the contract. Failure to provide such data results in the inability to conclude or perform the contract.

## 2.2 Data storage time

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Personal data will be stored until the limitation periods for claims arising from the contract with the customer expire. Certain data will also be stored until the expiry of data storage obligations resulting from special regulations, in particular the storage of accounting documents (no less than 5 years from the end of the calendar year in which the tax payment deadline expired), e.g. purchase data, also obtained via online forms.

If we process specific data on the basis of the legitimate interest of the Controller (Article 6 paragraph 1 letter f of the GDPR) and an effective objection to processing is raised before the expiry of the basic storage period, then the data will be processed for this specific purpose for a shorter period, i.e. until the objection is upheld.

If we process certain data on the basis of consent (Article 6, paragraph 1, letter a of the GDPR) and the consent is withdrawn before the expiry of the basic storage period, the data will be processed for this specific purpose for a shorter period, i.e. until the consent is withdrawn.

Personal data in the form of voice is not stored – it is only used to create transcripts during meetings. Meeting transcripts are retained for a period of 30 days.

**Communication data obtained from web forms, e-mail correspondence, chat, as part of customer technical support** – 2 years after the last communication within a given case.

**If claims may be related to the processing**, the data will be stored until the limitation period for such claims expires.

**If no contract is concluded between us**, the data will be stored until the offer expires or negotiations are concluded, but no longer than for a period of 6 months from the last contact, unless claims may be related to the processing, in which case the data will be stored until such claims are time-barred.

## 2.3 Recipients of your data

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The recipients of your data may be:

- **our service providers**, in particular entities that provide IT tools for processing your data or entities that have access to your data as part of service work carried out in IT systems, entities providing HR, accounting and consulting services, companies utilizing or archiving documents and other media, entities auditing our activities, marketing agencies,
- **Notification Processing Provider** (for SaaS platform users) Twilio,
- entities providing us with **legal assistance**,
- companies providing courier and postal services,
- state authorities or other entities authorized under the regulations, if it is necessary to fulfill the legal obligations of the Administrator,
- **Banks**,
- **Payment service provider** (for users of SaaS platforms): We use Stripe for payment processing, analytics, and other business services. Stripe collects and processes personal data, including device identification data, of devices that connect to its services. For more information, please see Stripe's privacy policy: [Stripe Privacy Policy](#).

## User role 3: Recipient of marketing activities, including newsletter recipients

### 3.1 Purposes, legal basis of processing, scope and source of data, information whether the provision of data is mandatory.

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We collect and process your data when:

- To pursue the legitimate interest of the Controller in **marketing its own products and services** (Article 6, paragraph 1, letter f of the GDPR), including by sending information about planned events and workshops, business updates, joining the event community, subscribing

to our newsletter, receiving eBooks and other information materials, using the following forms of communication:

- voice calls,
- email messages,
- text messages,
- traditional mail.

**NOTE** : the use of some forms of communication requires separate consent to use this channel. This applies to e-mails, text messages and voice calls, in accordance with the provisions of the Electronic Communications Law.

By providing us with your data for the purpose of sending us marketing information, you consent to such marketing through explicit action (e.g. by entering your email address when subscribing to the newsletter).

In case of subscribing to the newsletter, we inform you that the subscription requires double confirmation (double opt -in). This means that after providing your email address, you will receive an email asking you to confirm your consent.

- **Establishing, pursuing or defending against claims**, which constitutes our legitimate interest (Article 6 (1) (f) of the GDPR).

#### **Data scope:**

As a standard, we only collect the data necessary to send a marketing message, i.e. name and surname, e-mail address, telephone number or – in the case of messages sent by traditional post – correspondence address.

#### **Data source:**

We normally obtain data directly from you. We could also obtain it from our client, for whom you work/cooperate. The source of the data may also be an entity that has had your consent to share your data with us, or another valid legal basis.

#### **Obligation to provide data:**

Providing data is not a statutory or contractual requirement. However, data processing is necessary to achieve the purposes of processing.

Consent to marketing is completely voluntary – its absence does not affect the services we provide in any way.

### **3.2 Data storage time**

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**Marketing consents** - until you withdraw your marketing consent or until you object to marketing activities (i.e. let us know in any way that you do not want to receive marketing communications from us), or after 2 years of inactivity.

**Newsletter subscribers**, marketing consent can be easily withdrawn at any time by clicking on the unsubscribe link found in each email.

If you make specific claims related to our sending of marketing communications, your data will be stored until the limitation periods for such claims expire.

### 3.3 Recipients of your data

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The recipients of your data may be:

- **our service providers**, in particular entities that provide IT tools for processing your data or entities that have access to your data as part of service work carried out in IT systems, entities providing consulting services, companies utilizing or archiving documents and other media, entities auditing our activities,
- marketing agencies, entities providing marketing message sending services on our behalf,
- entities providing us with legal assistance,
- companies providing courier and postal services,
- state authorities or other entities authorized under the regulations, if it is necessary to fulfill the legal obligations of the Administrator.

### User role 4: AI Assistant chatbot user

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You can find more about AI Assistant in [What is AI Assistant?](#)

### 4.1 Purposes, legal basis of processing, scope and source of data, information whether the provision of data is mandatory.

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We collect and process your data for the purpose of:

- Enabling communication with a chatbot to obtain:
  - Technical information related to the Services, including technical analysis of edge devices.
  - Support in managing devices and containers.
  - Information from the technical documentation of the Service.

This is an element of our Service, which makes processing necessary for the performance of the contract (Article 6, paragraph 1, letter b of the GDPR).

- **Recording events in chatbot logs**, which constitutes our legitimate interest (Article 6 (1) (f) of the GDPR) in ensuring the continuity of system operation, security and incident handling, as well as in connection with securing against potential claims.

**Data scope:**

- The user's session identifier associated with the user's account.
- Information about technical events.
- Conversation content, including technical data of edge devices.

The user is asked not to provide any other personal data. The system also blocks the possibility of providing such data.

**Data source:**

By default, we collect data directly from you in connection with your use of the chatbot. The session identifier is generated automatically.

**Obligation to provide data:**

Using the chatbot is optional. If you want to use it, you must provide the personal data indicated above.

## 4.2 Data storage time

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**The content of the conversation** is saved in your browser for the duration of the session.

**System logs** are stored for a period of 3 months from the last user activity. In the event of a need to secure claims, the storage period may be extended until the end of the given proceedings.

## 4.3 Recipients of your data

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**The recipients of your data** is Google Cloud Poland sp. z o. o.

If you intend to provide CTHINGS.CO with personal data of third parties, remember to ensure that you have an appropriate legal basis for doing so. If such a basis is the consent of such parties, you must provide CTHINGS.CO with appropriate evidence of obtaining valid consent (e.g. a signed statement confirming such consent).

## 4. Do we collect special categories of data?

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CTHINGS.CO does not intentionally collect or store special categories of data, i.e. data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying an individual or data concerning health, sex life or sexual orientation. Please do not provide us with such information. If you store any sensitive material or information that is subject to privacy laws, you are solely responsible for safeguarding it and ensuring compliance with applicable laws. CTHINGS.CO is not responsible for your storage of sensitive information on our systems.

## 5. Do we collect information from minors?

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CTHINGS.CO Services are not directed to children under the age of 18 (or such other age as required by local law). We do not knowingly collect information from minors under the age of 18.

If such data is accidentally collected, it will be deleted immediately. Please contact us if you believe that a minor has provided us with personal data.

## 6. Do we share or transfer your data to third countries?

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Your personal data will generally not be transferred outside the European Economic Area (hereinafter: EEA). However, taking into account the services provided by the Controller's subcontractors in the implementation of support for ICT services and IT infrastructure, the Controller may commission specific IT activities or tasks to recognized subcontractors operating outside the EEA, which may result in the transfer of your data outside the EEA.

Recipients outside the EEA, in accordance with the decision of the European Commission, ensure an adequate level of protection of personal data in accordance with EEA standards (in the case of Google and other US companies on the Data Privacy Framework list - the basis is the COMMISSION IMPLEMENTING DECISION (EU) 2023/1795 of 10 July 2023 based on Regulation (EU) 2016/679 of the European Parliament and of the Council, stating the adequate level of protection of personal data ensured within the framework of EU-US data protection). In the case of recipients in the territory of Countries not covered by the decision of the European Commission, in order to ensure an adequate level of this protection, the Controller concludes agreements with recipients of your personal data based on standard contractual clauses issued by the European Commission in accordance with Article 46 paragraph 2 letter c of the GDPR.

A copy of the standard contractual clauses can be obtained from the Administrator by contacting the contact details provided above. The method of securing your data used by the Administrator is consistent with the principles set out in Chapter V of the GDPR. You can request further information on the security measures used in this regard, obtain a copy of these safeguards and information about where they are made available.

AI Assistant servers are located in the European Economic Area.

## 7. What are your data protection rights?

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CTHINGS.CO wants to make sure you are fully aware of your data protection rights. Every user has the right, to the extent resulting from the GDPR, i.e.:

- **Right of access to data (to the extent resulting from Art. 15 of the GDPR):**
- You have the right to access personal data stored by CTHINGS.CO, in particular you can exercise this right using the online account management interface if you have such an account with us. You have the right to request a copy of your personal data from

CTHINGS.CO. The first copy of the data is free of charge, but a reasonable fee may be charged for subsequent copies based on administrative costs.

- **Right to withdraw consent at any time (Article 7, paragraph 3, GDPR):**  
If the processing of your data is based on consent, you may withdraw your consent at any time. This does not affect the lawfulness of processing carried out before the withdrawal of consent.
- **The right to rectify data (to the extent resulting from Art. 16 of the GDPR):**
  - You have the right to request that your data be rectified if it is incorrect and to complete data that you consider incomplete. You can update your data yourself at any time via the CTHINGS.CO online account management interface if you have such an account with us.
- **The right to erasure (“the right to be forgotten”) (to the extent resulting from Article 17 of the GDPR):**
  - You have the right to request the deletion of your personal data. We will delete your data if we are required to do so under the GDPR. You may cancel your account at any time, at your own discretion, if you have one with us and request the deletion of your personal data by CTHINGS.CO, in accordance with the conditions set out in applicable law.
- **Right to restrict processing ( to the extent resulting from Art. 18 of the GDPR):**  
You have the right to request the restriction of the processing of your personal data by CTHINGS.CO in certain cases provided for by law.
- **Right to data portability (to the extent resulting from Art. 20 of the GDPR):**  
You have the right to request that CTHINGS.CO transfers your personal data to another organization or directly to you, under certain conditions provided for by law, and also:
- **The right to object to processing (to the extent resulting from Article 21 of the GDPR):**
  - You may object to the processing of your personal data at any time if the legal basis for their processing is the legitimate interest of the Controller or a third party (Article 6 paragraph 1 letter f of the GDPR). When filing an objection, you must indicate the reasons for it related to your particular situation - then we will cease processing your personal data for these purposes, unless we demonstrate the existence of important legitimate grounds for processing that override your interests, rights and freedoms or the existence of grounds for establishing, pursuing or defending claims.
  - If your objection concerns the processing of data for direct marketing purposes – then you do not have to provide any reasons for the objection – in this case, we will cease processing your personal data for these purposes.

If you make a request under the GDPR, we have one month to respond. To exercise any of your rights, please contact us at the address provided at the beginning of the policy.

In addition to the above rights, you also have:

- The right to lodge a complaint with the supervisory authority:

- Persons whose data is processed have the right to file a complaint with the supervisory authority if they believe that their data is being processed unlawfully. In Poland, this authority is: the President of the Personal Data Protection Office (UODO). More information can be found at: <https://uodo.gov.pl/pl/83/155>.

## 8. Will your data be subject to automated decision-making, including profiling, that produces legal effects or similar significant impact on you?

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Your data will not be subject to a decision based solely on automated processing, including profiling, that produces legal effects or has a similar significant impact.

## 9. What is AI Assistant?

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AI Assistant is a chatbot based on generative artificial intelligence (AI). It runs on the Vertex platform within Google Cloud. This means that the answers you receive do not come from a human. The answers are generated based on your queries, technical data, and knowledge that AI Assistant has access to. Your data and the history of your conversation with AI Assistant will not be used further to train any AI models - by Google or CTHINGS.CO.

We do not need your personal data to respond. Please do not provide it.

**Generative AI sometimes makes mistakes. Verify relevant information.**

## 10. Do we use cookies and tracking technologies?

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We use cookies for the following purposes:

- **Essential cookies:** Required for the website to function. Without them, you will not be able to use our online services properly. We use them by default, i.e. we save them on your computer, smartphone or tablet when you visit our website. They do not require user consent, in accordance with Article 399 paragraph 3 of the Electronic Communications Act.
- **Analytical and marketing cookies:** Used to analyze website usage and provide personalized advertising content. We only activate and use these cookies if you give us permission to do so.
- Analytical cookies allow us to track the number and sources of visits, so that we can measure and improve the performance of our website. This type of cookie helps us understand which pages are most or least visited and how visitors move around our site. If you refuse to have analytical cookies saved on your computer or smartphone, your visit will not be included in our statistics, but this will not limit any functionality on our website.

- Marketing cookies may be used in our advertising campaigns that are run on third-party websites. If you agree to the use of marketing cookies, you may receive information about the websites of our trusted partners on which you have responded to our advertisements. If you opt out of marketing cookies, you will be shown generic and non-personalized advertisements. As with analytical cookies, if you refuse to have marketing cookies saved on your computer or smartphone, this will not limit any functionality on our website for you.

**Since some of the cookies we use constitute personal data, we want you to know that your personal data will be processed to provide the basic functions of our website. If you have given appropriate (voluntary) consent, your data will also be processed to provide you with services, offers and communications tailored to your preferences and to analyze traffic on the site and provide social functions (depending on the preferences you have indicated).**

**For more information on the principles of personal data processing and your rights, please see the rest of the Privacy Policy.**

**The cookies we use are listed and described in detail in the CMP on our website.**

## Cookie management

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Cookie management tools from HubSpot, Inc. to manage your cookie preferences, in accordance with applicable privacy laws. HubSpot allows us to:

- Displaying cookie banners that allow you to accept, reject or customize cookies during your visit to our site.
- Collecting and storing your consent preferences, ensuring compliance with GDPR and other regulations.
- Enabling you to withdraw or change your cookie consent at any time via the " Cookie Settings " link on our website.

If you select "Allow", it means that you accept all cookies placed on our website and confirm that you have read the information about cookies and the purposes of their use, as well as the cases in which data collected using cookies is transferred to our partners.

If you do not want our cookies to be saved on your device, you can select the "Reject" option. By selecting this option, you will reject all cookies, except technically necessary, that we use on our website.

You can adjust cookies to your preferences. To do this, select "Cookie Settings " on the cookie banner displayed to you.

We also use tracking technologies on our websites, which are tools used to monitor user behavior on websites and applications. The purpose is to collect information about user actions, which is then used to personalize ads, analyze the effectiveness of marketing campaigns and optimize the website. We use these technologies if you consent to this.

## Third-party tracking technologies we use:

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### Facebook Pixel

CTHINGS.CO uses Facebook Pixel, a tool provided by Meta, Inc. that tracks and analyzes user interactions on our websites for marketing and analytics purposes. Facebook Pixel uses cookies to collect data such as your IP address and to create user profiles. Your data may also be transferred to the United States. Data transfers to the United States are secured pursuant to an adequacy decision or through standard contractual clauses or comparable protections. You can manage your preferences via the "Cookie Settings" option on the cookie banner displayed to you. For detailed information on data processing by Facebook Pixel, please see [the Facebook Data Policy](#).

### Google Ads Conversion Tracking

CTHINGS.CO uses Google Ads Conversion Tracking, a service provided by Google LLC that measures the effectiveness of our advertising campaigns. Google Ads Conversion Tracking uses cookies to track user interactions with our site and record conversions. The data collected may include your IP address. This information is typically anonymized and aggregated. The data may be transferred to Google servers, including those located in the United States, and its transfers are secured in accordance with the adequacy decision or standard contractual clauses, or equivalent protections. You can manage your cookie settings via the "Cookie Settings" option on the cookie banner displayed to you to opt out of this service. Details on data processing can be found in [the Google Privacy Policy](#).

### Google Analytics

CTHINGS.CO uses Google Analytics, a web analytics service provided by Google LLC, which collects and evaluates data about the use of our websites. Google Analytics uses cookies to monitor user interactions with our platforms. This data is used for analytical purposes and may include your IP address. Typically, this data is anonymized and aggregated. The information may be transferred to Google servers, including those located in the United States. Data transfer to the United States is secured in accordance with the adequacy decision or standard contractual clauses, or other appropriate mechanisms. If you wish to opt out of the use of Google Analytics cookies, you can do so by installing the [Google Analytics Opt -Out](#) browser add-on HYPERLINK "https://tools.google.com/dlpage/gaoptout". For more information, see [the Google Privacy Policy](#).

### Google Tag Manager

CTHINGS.CO uses Google Tag Manager, a tool provided by Google LLC that allows you to manage tags on the website via an interface. Google Tag Manager organizes various tags on our websites, especially those related to analysis and marketing. Google Tag Manager may use cookies to facilitate tag management but does not collect personal data. Details on data processing can be found in [the Google Privacy Policy](#).

### HubSpot

CTHINGS.CO uses HubSpot, a marketing automation platform provided by HubSpot, Inc., to analyze our websites and optimize marketing campaigns. HubSpot uses cookies to recognize your browser and may collect and transfer data, including your IP address. The data may be pseudonymized to create user profiles. Your data may also be transferred to the United States, and data transfers are made in accordance with an adequacy decision or through standard contractual clauses or other appropriate

safeguards. You can prevent the storage of cookies by using the "Cookie Settings " option on the cookie banner displayed to you. For details, see [HubSpot's Privacy Policy](#).

### **LinkedIn Insight Tag**

The CTHINGS.CO websites contain the LinkedIn Insight Tag, a tool provided by LinkedIn Corporation that collects data about user interactions with our sites. The LinkedIn Insight Tag uses cookies to track site activity and provide analytics. It may collect data such as your IP address. The data may be transferred to LinkedIn servers, including to the United States, and its transfers are secured in accordance with an adequacy decision or standard contractual clauses or similar protections. You can prevent the storage of cookies by using the "Cookie Settings " option on the cookie banner displayed to you. For details, see [the LinkedIn Privacy Policy](#).

## **11. Privacy policies of other websites**

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

## **12. Changes to the Privacy Policy**

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CTHINGS.CO regularly reviews its Privacy Policy and posts any updates or changes on this website unless other notice is required by applicable law. Changes to the Privacy Policy are effective upon posting on this website.

In the event of material changes to the Privacy Policy, we will notify you on our website or by email, where possible.