

## PRIVACY POLICY

### I. INTRODUCTION

1. The Controller of personal data collected in particular through the platform available at [www.seeplaces.com](http://www.seeplaces.com) (hereinafter: Service or Platform), i.e. the entity that decides how your personal data will be used, is Akati Sp. z o.o. with its registered office at ul. Reymonta 39, 45-072 Opole (hereinafter: Controller or Akati). Contact with the Controller is possible via e-mail address: [info@seeplaces.com](mailto:info@seeplaces.com).  
The Controller is responsible for the security of the personal data provided and for processing it in accordance with the law.
2. The Controller has appointed a Data Protection Officer (hereinafter: DPO), who can be contacted on matters related to the processing of personal data and the exercise of your rights under data protection laws. Contact with the DPO is possible via e-mail address: [info@seeplaces.com](mailto:info@seeplaces.com).
3. Your personal data is processed following the Regulation of the European Parliament and of the Council (EU) 2016/679 of April 27, 2016, on the protection of natural persons concerning the processing of personal data connection with the processing of personal data and on the free movement of such data and the repeal of Directive 95/46/EC (hereinafter: GDPR), and other currently applicable data protection laws.
4. During a visit to the Service, collection occurs via:
  - 1) Personal data provided by you (users of the Service),
  - 2) Data acquired and recorded automatically.
5. The purpose and scope of personal data used by the Controller are indicated in detail in the following section "Privacy Policy".

### II. DATA COLLECTED - BASIC INFORMATION

1. The following information applies to all of the Controller's uses of the personal data you provide, as indicated in Sections III and IV.
2. Personal data will not be used by the Controller to make decisions based solely on the automated processing of personal data, including profiling within the meaning of Article 22 of the DPA.
3. With all guarantees of data security, personal data processed through the Service may be transferred to other entities, including:
  - 1) entities entitled to receive them under the law,
  - 2) entities that process them on behalf of the Controller, such as technical service providers, hosting providers, analytics providers, marketing agencies, and consulting service providers,
  - 3) other data Controllers to the extent necessary for the execution of the contract, performance of services and legal requirements, in particular, suppliers of travel services presented on the Platform, notary or legal offices, companies providing postal and courier services,
  - 4) contractors performing services for the Controller based on concluded contracts.
4. The Controller, to the extent necessary for the proper performance of the contract, may transfer personal data to Akati's recognized subcontractors or contractors processing personal data in countries outside the European Economic Area (hereinafter: EEA).

Considering that the level of protection of personal data in these countries may differ from that provided by the GDPR within the European Union, the transfer of data is carried out with an appropriate degree of protection, primarily by:

- 1) Cooperation with processors of personal data in countries outside the EEA for which the European Commission has determined that they provide an adequate level of protection (this includes US companies certified under the approved EU-US Data Protection Framework, such as Microsoft),

and in the absence of the aforementioned decision of the European Commission:

- 2) The use of standard contractual clauses in contracts with such companies,
- 3) application of binding corporate rules approved by the relevant supervisory authority,
- 4) application of the terms and conditions set forth in Article 49 of the GDPR.

The Controller ensures that any transfer of personal data is carried out based on appropriate agreements, in a secure and controlled manner.

In any of the cases described in paragraphs 2-4 above, you may request further information on the safeguards in place in this regard, obtain a copy of these safeguards and information on where they are available.

5. The Controller informs that in connection with the processing of personal data obtained through the Service, each data subject has the right to submit a request concerning:
  - 1) access to data (including obtaining information on what data is processed by the Controller and to what extent, as well as obtaining a copy of the data - details: Article 15 GDPR),
  - 2) rectify the data (i.e., correct it if the data processed by the Controller is incorrect or incomplete - details: Article 16 of GDPR),
  - 3) deletion of data (if, for example, the data are no longer needed for the purposes for which they were collected or the Controller has no legal basis for processing the data - details: Article 17 of the GDPR),
  - 4) limitation of data processing (if, for example, you question the accuracy of the personal data used by the Controller, if the data is no longer needed by the Controller, but must be processed because you are pursuing a claim - details: Article 18 of the DPA),
  - 5) object to the processing of personal data, including profiling (if the personal data is processed based on the legitimate interest of the Controller, or is used for direct marketing purposes - details: Article 21 GDPR).
  - 6) transfer of data to another Controller (if the processing of data provided to the Controller is carried out by automated means, on the basis of consent or based on a contract - details: Article 20 GDPR).
  - 7) if the processing is based on consent (e.g., consent to the use of data for marketing purposes), you have the right to withdraw consent at any time by any means (whereby withdrawal of consent does not affect processing that occurred before the submission of the statement of withdrawal of consent).
6. Any person whose data is processed has the right to lodge a complaint with the President of the Office for Personal Data Protection (supervisory authority) if you believe that the processing of personal data violates the law (for more information: <https://uodo.gov.pl/pl/83/155>).
7. The data was obtained by the Controller directly from you (users of the Website). The Controller may also process:
  - 1) data of other persons, provided by the user of the Website during their use of the services described in this "Privacy Policy",
  - 2) personal data obtained from entities with which the Controller cooperates based on concluded contracts (e.g., business data of employees designated for contact

for the purpose of contract execution, data of persons who are participants in events organized by the Controller),

- 3) personal data obtained from third parties cooperating with the Controller, whereby the data was made available to the Controller based on your consent,
- 4) data obtained from publicly available sources, such as the National Court Register, the Central Register and Information on Business Activity, websites.

### **III. PERSONAL DATA PROVIDED BY YOU**

#### **III. A. E-MAIL OR TELEPHONE CONTACT**

1. The Controller processes personal data, in particular your name, e-mail address and other information provided by you, to the extent necessary to handle requests and fulfill your inquiry, including conducting communication and answering questions asked via the contact phone number and e-mail address provided on the Service (legal basis: Article 6(1)(f) GDPR - legitimate interest).
2. The Controller has the right to process personal data for the period necessary to carry out the inquiry, including to respond to the correspondence sent or the application/question provided during the phone call.
3. Provision of data is voluntary but necessary to respond to the submitted question or for proper handling of the application and execution of the inquiry. The consequence of failing to provide personal data may be the inability to answer or fulfill the inquiry.

#### **III. B. FORM (CONTACT / OFFER)**

1. The Controller may collect your personal data through the form available on the Website, in particular:
  - 1) name,
  - 2) e-mail address,
  - 3) IP address,
  - 4) other information provided by you through the form (e.g., phone number).
2. The Controller processes personal data only to the extent necessary:
  - 1) to receive and handle the request, including conducting communications and responding to requests and questions submitted via the form (legal basis: Article 6(1)(f) GDPR - legitimate interest),
  - 2) to establish contact (through the chosen communication channel) and to prepare and present an offer in response to the Service user's request transmitted through the form (legal basis: Article 6(1)(b) GDPR - taking action at the request of the data subject before entering into a contract).
3. The Controller has the right to process personal data for the period necessary for the purposes indicated above. Depending on the legal basis, this will be respectively:
  - 1) The time required to process the request and respond to the inquiry sent by the user via the form,
  - 2) The time required to prepare and communicate a dedicated offer.
4. Providing personal data indicated in the form is voluntary, but necessary to respond to the submitted inquiry, properly handle the request, and prepare and present a dedicated offer. The consequence of failing to provide personal data may be the inability to respond, process the inquiry or present an offer.

### III. C. PROVISION OF SERVICES

1. The Controller processes your personal data for the purpose of:
  - 1) providing a service (including a service provided electronically) aimed at providing information about travel services from Suppliers and directing to Suppliers a request for quotation, under the Terms and Conditions of Use of the "SeePlaces.com" Platform. (legal basis: Article 6(1)(b) GDPR - taking action at the request of the data subject),
  - 2) performing the Controller's legal obligations, e.g. financial settlements and accounting reporting, including issuing and storing invoices or responding to complaints (legal basis: Article 6(1) (c) GDPR - legal obligation),
  - 3) to pursue contractual claims (legal basis: Article 6(1)(f) GDPR - legitimate interest); the deadlines for pursuing contractual claims are detailed in the Civil Code,
  - 4) Verification of the quality of services provided in connection with the concluded contract (legal basis: Article 6(1)(f) GDPR - legitimate interest),
  - 5) Direct marketing (of the Controller's own products and services and those of its partners), including personalization of marketing content (legal basis: Article 6(1)(f) GDPR - legitimate interest),
  - 6) conduct marketing communications using electronic communication (in particular, e-mail, telephone calls, SMS messages) based on a separate consent to process data for this purpose (legal basis: Article 6(1)(a) GDPR - consent).
2. The identification and contact information of all persons listed in a request for quotation submitted for a selected travel service offered by its Supplier is obtained by the Controller directly from the person who sends the request through the Service.
3. The person who executes the inquiry referred to in paragraph 2 above also does so on behalf of all persons named in the inquiry and thus assumes responsibility for informing them of the Controller's personal data processing rules set forth herein.
4. The Controller has the right to process personal data for the period necessary for the purposes indicated above. Depending on the legal basis, this will be respectively:
  - 1) the time necessary to implement the contract,
  - 2) the time for the performance of legal obligations and the time for which the law mandates the storage of data, such as tax regulations,
  - 3) the time after which the statute of limitations for claims under the contract will expire,
  - 4) the time until an objection is expressed,
  - 5) the time until you withdraw your consent to communicate via the chosen communication channel (e-mail address, phone number).
5. The provision of personal data, to the extent that the processing of data occurs to enter into and perform a contract, is voluntary, but necessary to enter into a contract, including the execution of a request for quotation submitted for a selected travel service offered by its Provider.
6. Providing data to receive marketing communications through the chosen communication channel (i.e. e-mail address, telephone number) is voluntary, but necessary to receive commercial information. The consequence of not providing personal data will be the inability to receive marketing content (e.g. information about promotional offers).
7. The recipient of marketing communications may opt out of receiving them at any time, in particular by contacting the Controller or the DPO (via the contact information indicated above). The withdrawal of consent does not affect the legality of the use of data during the period when such consent was in effect.

### **III. D. MARKETING COMMUNICATIONS**

1. The Controller processes your personal data for the purpose of:
  - 1) conduct marketing communications using electronic communication (in particular, e-mail, telephone calls, SMS messages) based on a separate consent to process data for this purpose (legal basis: Article 6(1)(a) GDPR - consent),
  - 2) To carry out direct marketing, including sending information about the Controller's offerings and information about products and services of third parties cooperating with Akati (e.g. business partners), including personalization of marketing content, i.e. preparation and presentation of an offer tailored to your preferences (legal basis: Article 6(1)(f) GDPR - legitimate interest).

- taking into account the provisions of the Law on Provision of Electronic Services and the provisions of the Telecommunications Law.
2. The Controller has the right to process personal data for the period necessary for the purposes indicated above. Depending on the legal basis, this will be respectively:
  - 1) time until you withdraw your consent to communicate through the chosen communication channel (e-mail address, phone number),
  - 2) time until an objection is expressed.
3. Providing data to receive marketing communications through the chosen communication channel (i.e. e-mail address, telephone number) is voluntary, but necessary to receive commercial information. The consequence of not providing personal data will be the inability to receive marketing content.
4. The recipient of marketing communications may opt out of receiving them at any time, in particular by contacting the Controller or the DPO (via the contact information indicated above). The withdrawal of consent does not affect the legality of the use of data during the period when such consent was in effect.
5. The Controller may also share your personal data with third parties (e.g. business partners) for these entities to carry out their own marketing activities. Sharing your personal data will be possible only based on your separate consent to process your data for such a purpose. The entity indicated in the content of the consent will then become an independent Controller of the personal data provided on this basis.

### **III. E. ADDING RATINGS AND OPINIONS**

1. The Controller processes personal data to allow you to add ratings and opinions on the travel services presented on the Platform from Suppliers, via an online survey that is made available in an e-mail, after you have used the selected service (legal basis: Article 6(1)(a) GDPR - consent).
2. The Controller has the right to process your personal data until you withdraw your consent.
3. Provision of personal data is voluntary, but necessary to take advantage of the opportunity offered by the Controller to add ratings and reviews. The consequence of not providing the required personal data will be the inability to add ratings and reviews.

### **III. F. LINKEDIN**

1. Akati is the Controller of personal data of users using the services and products offered by LinkedIn Ireland Unlimited Company, headquartered in: Wilton Place, Dublin 2, Ireland (hereinafter: LinkedIn), who visit the Controller's website available at: <https://www.linkedin.com/company/seeplaces/> (hereinafter: Company Site).

As the Controller, it is responsible for the security of the personal data provided and processing in accordance with the law.

2. The Controller processes the personal data of users who, using LinkedIn products and services, visit the Company Site. This data is processed:
  - 1) in connection with the operation of the Company's Website, including the promotion of its own brand (legal basis: Article 6(1)(f) GDPR - legitimate interest);
  - 2) to respond to inquiries made through the services offered by LinkedIn (legal basis: Article 6(1)(f) GDPR - legitimate interest); if you provide specific categories of data (e.g., health information), you declare that you consent to their use for the proper handling of the request and fulfillment of the inquiry, including communication and response (legal basis: Article 9(2)(a) GDPR - consent).
3. The Controller has the right to process:
  - 1) publicly available personal information (such as username, profile picture, activity status on LinkedIn), the content of comments and other information publicly shared by a user using LinkedIn products and services,
  - 2) personal data provided by a user visiting the Company Website, including the collection of information provided in the user's profile and other content, comments, messages and communications (e.g., photos, contact information, place of work, place of residence, information on education, interests or worldview beliefs),
  - 3) other personal data provided by users in the content of messages through LinkedIn services (including contact and health data) to respond to the inquiry sent or to fulfill a contact request.
4. The scope of the processing of personal data, the specific purposes and the rights and obligations of the user using LinkedIn's products and services follow directly from:
  - 1) LinkedIn's rules and regulations (the document is available on LinkedIn at: <https://pl.linkedin.com/legal/user-agreement>) and
  - 2) "Privacy Policy" (the document is available on LinkedIn at: <https://pl.linkedin.com/legal/privacy-policy>) or
  - 3) Applicable laws- and are refined as a result of the user's actions on the LinkedIn social network.
5. The Controller has the right to process personal data for the period necessary for the purposes indicated above. Depending on the legal basis, this will be respectively:
  - 1) the time until you object (or delete your LinkedIn user account),
  - 2) the time until you withdraw your consent (or delete your LinkedIn user account). The withdrawal of consent does not affect the lawfulness of data processing during the period when consent was in effect;
  - 3) the period necessary to handle the inquiry sent by the user through LinkedIn services.
6. The catalog of recipients of personal data processed by the Controller is primarily based on the range of products and services used by the LinkedIn user, but also on the user's consent or by law. With all guarantees of data security, the Controller may transfer the personal data of a user visiting the Company Page to other entities that process data on behalf of the Controller, such as technical service providers and consulting service providers (including law firms) and contractors that perform services for the Controller based on concluded contracts.
7. The Controller will not transfer the personal data of a user using LinkedIn products and services to countries outside the European Economic Area (countries other than those of the European Union and Iceland, Norway and Liechtenstein).
8. The Controller may process the personal data of users of LinkedIn products and services who visit the Company Page to analyze users' use of the Controller's website and related content (to

conduct statistics) - in case users' use of the Company Page and related content triggers the creation of an event for website statistics, with which the processing of personal data is connected (legal basis: Article 6(1)(f) GDPR - legitimate interest).

9. In the case of personal data processed to keep statistics on user actions taken on the Company Page (including following or unfollowing the Company Page, recommending the Company Page in a post or comment), Akati and LinkedIn are Joint Controllers of users' personal data. The types of data and the scope of their processing, as well as the privacy principles and rights of users, are indicated in detail:
  - 1) in this document,
  - 2) in the document "Privacy Policy," published on LinkedIn at: <https://pl.linkedin.com/legal/privacy-policy>,
  - 3) in the document "Page Insights Joint Controller Addendum," published on LinkedIn at: <https://legal.linkedin.com/pages-joint-controller-addendum>.
10. It is LinkedIn's responsibility to notify users using LinkedIn's products and services of the processing of data for site statistics and to allow them to exercise their rights under the GDPR (information about the data used to create site statistics has been made available on LinkedIn's website at: <https://pl.linkedin.com/legal/privacy-policy>).
11. LinkedIn's Data Protection Officer can be contacted via the form provided at: <https://www.linkedin.com/help/linkedin/ask/TSO-DPO>.

### **III. G. FACEBOOK**

1. Akati is the Controller of the personal data of users using the products and services offered by Meta Platforms Ireland Limited, registered office: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (hereinafter: Meta), who visit the Controller's company website available at: <https://www.facebook.com/SeePlacescom/> (hereinafter: Fanpage). As the Controller, it is responsible for the security of the personal data provided and the processing of such data in accordance with the law.
2. The Controller processes the personal data of users who visit the Fanpage when using Meta's products and services. These data are processed:
  - 1) in connection with the operation of the Fanpage, including promoting one's own brand (legal basis: Article 6(1)(f) GDPR - legitimate interest),
  - 2) to respond to inquiries made via Messenger or other services offered by Meta (legal basis: Article 6(1)(f) of the GDPR - legitimate interest); if you provide special categories of data (e.g., health information), you state that you consent to their use to properly handle your request and fulfill your inquiry, including communication and response (legal basis: Article 9(2)(a) of the GDPR - consent).
3. The Controller has the right to process:
  - 1) publicly available personal information (such as username, profile picture, Facebook or Messenger activity status), the content of comments and other information publicly shared by a user using Meta's products and services,
  - 2) Personal data provided by a user visiting the Fanpage, including the collection of information shared in the user's profile and other content, comments, messages and communications (e.g., photos, videos, contact information, information on interests or worldview beliefs, place of residence),
  - 3) other personal data provided by you in the content of your messages via Messenger or other Meta services (including contact information, health information, etc.) to respond to your inquiry or to fulfill your contact request.

4. The scope of the processing of personal data, the specific purposes and the rights and obligations of the user using Meta's products and services arise directly from:
  - 1) Facebook's Terms and Conditions (the document is available at: <https://www.facebook.com/legal/terms>) and
  - 2) "Data Principles" (the document is available at: <https://www.facebook.com/policy>) or
  - 3) Applicable laws- and are refined as a result of the user's actions on Facebook.
5. The Controller has the right to process personal data for the period necessary for the purposes indicated above. Depending on the legal basis, this will be respectively:
  - 1) the time until you object (or delete your Facebook user account),
  - 2) the time until you withdraw your consent (or delete your Facebook user account); withdrawal of consent does not affect the lawfulness of data processing while consent was in effect,
  - 3) the period necessary to handle an inquiry sent by you through Messenger or other Meta services.
6. The catalog of recipients of personal data processed by the Controller is primarily based on the range of products and services used by the Facebook user, but also on the user's consent or by law. With all guarantees of data security, the Controller may provide personal data of the user visiting the Fanpage to other entities, including entities that process data on behalf of the Controller, such as providers of technical services and entities that provide consulting services (including law firms) and contractors that provide services to the Controller based on concluded agreements.
7. The Controller will not transfer your personal data using Meta's products and services to countries outside the European Economic Area (countries other than those of the European Union and Iceland, Norway and Liechtenstein).
8. The Controller may process the personal data of users of Meta's products and services who visit the Fanpage to analyze users' use of the Controller's website and related content (to conduct statistics) - in case users' use of the Fanpage and related content triggers the creation of an event for website statistics, with which the processing of personal data is connected (legal basis: Article 6(1)(f) GDPR - legitimate interest).
9. In the case of personal data processed to keep statistics on user actions taken on the Fanpage (including following or unfollowing the page, recommending the page in a post or comment, liking the page or post, and cancelling a like), Akati and Meta are Joint Controllers of users' personal data. The types of data and the scope of their processing, as well as the principles of privacy protection and users' rights, are indicated in detail:
  - 1) in this document,
  - 2) in the document "Data Principles," published at: <https://www.facebook.com/policy>,
  - 3) In the document "Information on site statistics", published on the site: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).
10. It is Meta's responsibility to notify users who use Meta's products and services of the processing of data for site statistics and to enable them to exercise their rights under the GDPR (information about the data used to create site statistics has been made available at: [https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data)).
11. Meta's Data Protection Officer can be contacted via the form available at: <https://www.facebook.com/help/contact/540977946302970>.



### III. H. INSTAGRAM

1. Akati is the Controller of the personal data of users using Meta's products and services on Instagram who visit the Controller's company page available at: <https://www.instagram.com/seeplacescom/> (hereinafter: Company Profile).

As the Controller, it is responsible for the security of the personal data provided and its processing in accordance with the law.

2. The Controller processes the personal data of users who visit the Company Profile when using Meta's products and services. This data is processed:

- 1) in connection with the maintenance of the Company Profile, including promoting one's own brand (legal basis: Article 6(1)(f) GDPR - legitimate interest),
- 2) to respond to inquiries made via Instagram or other services offered by Meta (legal basis: Article 6(1)(f) GDPR - legitimate interest); if you provide specific categories of data (e.g., health information), you state that you consent to its use to properly handle your request and fulfill your inquiry, including conducting communication and responding (legal basis: Article 9(2)(a) GDPR - consent).

3. The Controller has the right to process:

- 1) publicly available personal information (such as username, profile picture, activity status on Instagram), the content of comments and other information publicly shared by a user using Meta's products and services on Instagram,
- 2) personal data provided by a user visiting the Company Profile, including the collection of information shared in the user profile and other content, comments, messages and communications (e.g., photos, videos, contact information, information on interests or worldview beliefs, place of residence),
- 3) other personal information provided by users in the content of messages via Instagram or other Meta services (including contact information, health information, etc.) to respond to a submitted inquiry or to fulfill a contact request.

4. The scope of the processing of personal data, the specific purposes and the rights and obligations of the user using Meta's products and services arise directly from:

- 1) Instagram rules and regulations (the document is available at: <https://help.instagram.com/581066165581870>) and
- 2) "Privacy Principles" (the document is available at: <https://privacycenter.instagram.com>) or
- 3) Applicable laws

- and are refined as a result of the user's actions on the social network Instagram.

5. The Controller has the right to process personal data for the period necessary for the purposes indicated above. Depending on the legal basis, this will be respectively:

- 1) the time until you object (or delete your Instagram user account),
- 2) the time until the consent is withdrawn (or the Instagram user account is deleted); withdrawal of consent does not affect the lawfulness of data processing during the period when consent was in effect,
- 3) the period necessary to handle the request sent by the user via Instagram or other Meta services.

6. The catalog of recipients of the personal data processed by the Controller is primarily based on the range of products and services used by the Instagram user, but also on the user's consent or by law. With all guarantees of data security, the Controller may provide personal data of the user

visiting the Company Account to other entities, including entities processing data on behalf of the Controller, such as providers of technical services and entities providing consulting services (including law firms) and contractors performing services for the Controller based on concluded contracts.

7. The Controller will not transfer your personal data using Meta's products and services to countries outside the European Economic Area (countries other than those of the European Union and Iceland, Norway and Liechtenstein).
8. The Controller may process the personal data of users of Meta's products and services who visit the Company Profile to analyze users' use of the Controller's website and related content (conduct statistics) - in case users' use of the Company Account and related content triggers the creation of an event for website statistics, with which the processing of personal data is connected (legal basis: Article 6(1)(f) GDPR - legitimate interest).
9. In the case of personal data processed to keep statistics on the actions taken by the user on the Company Profile (including following or unfollowing the Company Profile, recommending the Company Profile in a post or comment, liking the Company Profile or a post, cancelling a like), Akati and Meta are Joint Controllers of users' personal data. The types of data and the scope of their processing, as well as the principles of privacy protection and users' rights, are indicated in detail:
  - 1) in this document,
  - 2) in the document "Privacy Policy," published on the website:  
<https://privacycenter.instagram.com/policy>,
  - 3) in the document "Information on site statistics", published at:  
[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).
10. It is Meta's responsibility to notify users who use Meta's products and services of the processing of data for site statistics and to enable them to exercise their rights under the GDPR (information about the data used to create site statistics has been made available at: [https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data)).
11. Meta's Data Protection Officer can be contacted via the form available at: <https://www.facebook.com/help/contact/540977946302970>.

### III. I. YOUTUBE

1. Akati is the Controller of personal data of users who use the products and services offered by Google Ireland Limited with registered office: Gordon House, Barrow Street, Dublin, D04 E5W5, Dublin, Ireland (hereinafter: Google) on YouTube who visit the Controller's company page available at: [https://www.youtube.com/channel/UCV-Q\\_jlZD32ESqnCQsMy5YQ](https://www.youtube.com/channel/UCV-Q_jlZD32ESqnCQsMy5YQ) (hereinafter: Company Channel). As the Controller, it is responsible for the security of the personal data provided and its processing in accordance with the law.
2. The Controller processes the personal data of users who visit the Company Channel when using YouTube products and services. This data is processed:
  - 1) in connection with the operation of the Company Channel, including the promotion of its own brand (legal basis: Article 6(1)(f) GDPR - legitimate interest);
  - 2) to respond to inquiries made via YouTube or other services offered by Google (legal basis: Article 6(1)(f) GDPR - legitimate interest; if you provide specific categories of data (e.g., health information), you state that you consent to its use for the proper handling of the request and the execution of the inquiry, including communication and response (legal basis: Article 9(2)(a) GDPR - consent).
3. The Controller has the right to process:

- 1) publicly available personal information (such as username, profile picture, YouTube activity status), comment content and other information publicly shared by a user using YouTube products and services,
  - 2) personal data provided by a user visiting the Company Channel, including the collection of information shared in the user's profile and other content, comments, messages and communications (e.g., photos, videos, contact information, information on interests or worldview beliefs, place of residence),
  - 3) other personal data provided by users in the content of messages via YouTube or other Google services (including contact information, health data, etc.) to respond to a submitted inquiry or to fulfill a contact request.
4. The scope of the processing of personal data, the specific purposes, and the rights and obligations of the user using YouTube's products and services are derived directly from:
- 1) YouTube regulations (the document is available on YouTube's website at: <https://www.youtube.com/intl/pl/about/policies/#community-guidelines>) and
  - 2) the document "Privacy Policy - Privacy and Terms" (the document is available on Google's website at: <https://policies.google.com/privacy>) or
  - 3) Applicable laws
- and are refined as a result of user actions on YouTube.
5. The Controller has the right to process personal data for the period necessary for the purposes indicated above. Depending on the legal basis, this will be respectively:
- 1) the time until you object (or delete your YouTube user account),
  - 2) the time until you withdraw your consent (or delete your YouTube user account). The withdrawal of consent does not affect the lawfulness of data processing during the period when consent was in effect;
  - 3) the period necessary to handle the request sent by the user via YouTube or other Google services.
6. The catalog of recipients of personal data processed by the Controller is primarily based on the range of products and services used by the YouTube user, but also on the user's consent or by law. With all guarantees of data security, the Controller may provide the personal data of a user visiting the Company Channel to other entities, including entities processing data on behalf of the Controller, such as providers of technical services and entities providing consulting services (including law firms) and contractors performing services for the Controller based on concluded contracts.
7. The Controller will not transfer the personal data of a user using YouTube products and services to countries outside the European Economic Area (countries other than those of the European Union and Iceland, Norway and Liechtenstein).
8. The Controller may process the personal data of users of YouTube products and services who visit the Company Channel to analyze how users use the Controller's website and related content (to conduct statistics) - in the event that users' use of the Company Channel and related content triggers the creation of an event for website statistics, with which the processing of personal data is associated (legal basis: Article 6(1)(f) GDPR - legitimate interest).
9. In the case of personal data processed to keep statistics on user actions taken on the Company Channel (including following or unfollowing the Company Channel, recommending the Company Channel in a post or comment, liking a video, cancelling a like), Akati and Google are separate Controllers of users' personal data. The types of data and the scope of their processing, as well as the principles of privacy protection and users' rights, are indicated in detail:
- 1) in this document,

- 2) in the document "Privacy Policy-Privacy and Terms," published on Google's website at: <https://policies.google.com/privacy>,
10. It is Google's responsibility to notify users who use YouTube products and services of the processing of data for site statistics and to enable them to exercise their rights under the GDPR (information about the data used to create site statistics has been made available on Google's website at: <https://policies.google.com/privacy>).
11. Google's Data Protection Officer can be contacted via e-mail address: [data-protection-office@google.com](mailto:data-protection-office@google.com).

#### **IV. DATA COLLECTED AUTOMATICALLY**

1. Using the service available at <https://seeplaces.com> involves sending requests to the server, which are automatically recorded in event logs.
2. Event logs record data on user sessions. In particular, these are: the IP address, type and name of the device, information about the web browser and operating system, and date and time of visiting the Site.
3. Data recorded in event logs are not associated with specific individuals.
4. Access to the contents of event logs is granted to persons authorized by the Controller to administer the Service.
5. The chronological record of event information is only auxiliary material, used for administrative purposes. The analysis of event logs makes it possible, in particular, to detect threats, ensure adequate security of the Service and create statistics to learn about the use of the Service by its users.
6. User session data is used by the Controller to diagnose problems with the functioning of the Service and to analyze possible security violations, manage the Service and produce statistics (legal basis: Article 6(1)(f) GDPR - legitimate interest).
7. We use cookies on the Website. For more information, please see the "[Cookie Policy](#)" available below.

#### **V. FINAL PROVISIONS**

1. This "Privacy Policy" is for informational purposes and applies specifically to the Platform available at <https://seeplaces.com>.
2. The Website may contain links to websites of other entities, e.g. social networks (e.g. Facebook, Instagram, LinkedIn, YouTube), service providers and business partners of Akati. The Controller recommends that each user, after navigating to the websites of other entities, read the privacy policies in force there.
3. The Controller reserves the right to make changes to the current "Privacy Policy", in particular in cases of:
  - 1) technology development,
  - 2) changes in generally applicable laws, including in the area of personal data protection or information security,
  - 3) Development of the Service, including implementation of new services and functionalities.
4. The Controller will notify users about relevant changes in the content of the "Privacy Policy" in particular by posting a notice on the Website.
5. This version of the "Privacy Policy" is applicable as of June 8, 2024.