

## ECOTONE | PRIVACY POLICY

Last Modified: 21.03.2025

<b>General Information</b>	You are invited to read the information on the processing of personal data in connection with services provided while using the Website. Among other things, you will find the principles, purposes and legal basis of data processing, information on data recipients and your rights. The use of Website and its functionalities is voluntary. However, some information is required for proper use. If you do not accept the Privacy policy provisions, discontinue use of the Website.	
<b>Who is the Controller of your personal data?</b>	The Controller of your personal data is Dariusz Gafka conducting business as Dariusz Gafka Simply Coded Software, ul. Romana Felińskiego 5/14, 81-578 Gdynia, NIP (Tax ID) 5871681098, REGON 366137994	
<b>How can you contact with the Controller?</b>	For all matters relating to the protection of your personal data you may contact the Controller by writing to the following e-mail address: <a href="mailto:support@simplycodedsoftware.com">support@simplycodedsoftware.com</a> .  In the absence of such obligations, I have not appointed a data protection officer.	
<b>Definitions</b>	<b>Data processing</b>	an operation or set of operations performed on Personal data or sets Personal data by automated or non-automated means, such as collecting, recording, organising, structuring, storing, adapting or modifying, downloading, viewing, using, disclosing by transmission, dissemination or otherwise making available, matching or linking, restricting, deleting or destroying;
	<b>GDPR</b>	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);
	<b>Joint Controller</b>	a controller who jointly with the Controller determines the purposes and means of Data processing (Article 26 (1) GDPR);

	<p><b>Personal data</b></p> <p>personal data within the meaning of the GDPR, including identification data (e.g. name, surname, business name), contact data to the extent provided by the User (e.g. phone number, address, e-mail address);</p> <p><b>Privacy Policy</b></p> <p>This Privacy Policy available at <a href="https://ecotone.tech">ecotone.tech</a></p> <p><b>Processor</b></p> <p>a natural or legal person or other entity that processes Personal data on behalf of the Controller;</p> <p><b>User / you</b></p> <p>any natural person visiting the Website or using one or more of the services or functionalities described in the Privacy policy;</p> <p><b>Website</b></p> <p>Internet service managed by the Controller at <a href="https://ecotone.tech">ecotone.tech</a></p>
<b>Joint Controllers</b>	<p>The Joint Controller of the Personal data are:</p> <ul style="list-style-type: none"> <li>– Paddle Payments Ltd. (Limerick House, Limerick Lane, Newbridge, Kildare Ireland);</li> <li>– Paddle.com Inc (3811 Ditmars Blvd, #1071 Astoria, New York, 11105-1803, USA);</li> <li>– Paddle.com Market Ltd. (Judd House, 18-29 Mora Street, London, EC1V 8BT, United Kingdom)</li> </ul> <p>Co-Data processing is related to the use of payment platforms.  Privacy policy: <a href="https://www.paddle.com/legal/privacy">https://www.paddle.com/legal/privacy</a>;  Data processing Addendum: <a href="https://www.paddle.com/legal/data-processing-addendum">https://www.paddle.com/legal/data-processing-addendum</a>  Data Sharing Addendum: <a href="https://www.paddle.com/legal/data-sharing-addendum">https://www.paddle.com/legal/data-sharing-addendum</a></p>
<b>Scope of the Privacy policy</b>	<p>Privacy policy applies to the Controller's Data processing, including under the data processing agreement, authorisation or provision of personal data. The Controller processes the User's Personal data to the extent necessary for the use of the performance of the agreement. The Controller may also process Personal data identifying the device through which you use the Website, such as IP addresses, Internet identifiers, data obtained from cookies. In combination with other data, this data could potentially identify you. It is used to identify the User's session, to customise the content displayed and for statistical, analytics purposes. If User interacts with the Controller via other platforms, the controller of the relevant</p>

**Purposes, scope, legal basis and duration of Data processing and obligation / voluntariness to provide Personal data**

platform is a Joint Controller, which means that it determines the purpose and means of data processing independently of the Controller.

The duration of the Data processing depends mainly on the purpose of the Data processing. As a general rule, Personal data will be processed for the duration of the use of the services/performance of the respective purpose of processing and thereafter until the statute of limitations for possible claims, for the duration of mandatory storage of Personal data and for analytical and statistic purposes. Some of your Personal data may be processed until your object and, if the basis for the Data processing is consent, until it is withdrawn. The detailed purposes, scope and legal basis for the Data processing collected during the use of the Website, its functionalities and the Controller services are described below.

The use of Website and the conclusion of the agreements with the Controller are voluntary, as is the provision of Personal data to the Controller. However, certain Personal data are necessary for the conclusion and performance of the agreement and for the proper provision of the services. The Controller has analysed the risks involved. The User's Personal data will be processed in accordance with current legislation and with appropriate technical and organisational security measures. Personal data may be processed for the following purposes, on the basis of the indicated legal ground, to the extent and for the duration indicated:

**1. Conclusion and performance of the agreement**

**Personal data scope:** Personal data necessary for the conclusion and execution of the agreement: name, surname, business name, name of the country/region, street, postal code, city, telephone number, e-mail address, VAT number, tax identification number. Optionally – depending on what services the agreement concerns – other Personal data provided by the User.

Provision of data is voluntary, but necessary for the conclusion and performance of the agreement. The consequence of not providing the Personal data is the inability to conclude and perform the agreement.

**Legal basis:** Article 6 (1) (b) of the GDPR (necessary for the conclusion and performance of the agreement for the provision of services).

**The duration of the Data processing:** for the duration of the agreement and thereafter until the expiry of the statute of limitations for claims arising from the concluded agreement, and for the purpose of establishing and asserting any claims relating to the agreement or defending against claims – until the expiry of the statute of limitations for claims, and for the purpose of fulfilling accounting and tax obligations and for archival purposes, as well as for statistical purposes.

## **2. Establishment and maintenance of the User account and the provision of User account maintenance services**

**Personal data scope:** e-mail address required to set up the User's account and, for the purposes of contracting and using services through the account, billing information: name, surname, business name, country/region, street, postal code, city, phone number, e-mail address, VAT number, tax identification number, IP number from which the User's account was registered.

Provision of data is voluntary, but necessary for the establishment and maintenance of the User account. The consequence of not providing the Personal data is the inability to establish and maintain the User account.

**Legal basis:** Article 6 (1) (b) of the GDPR (necessary for the conclusion and performance of the agreement for the establishment and maintaining a User account).

**The duration of the Data processing:** for the duration of the agreement and thereafter until the expiry of the statute of limitations for claims arising from the agreement, as well as for the purpose of the possible establishment and investigation of claims relating to the agreement or the defence against claims – until the expiry of the statute of limitations for claims.

## **3. Complaints handling**

**Personal data scope:** Personal data included in the content of the complaint request.

**Legal basis:** Article 6 (1) (c) of the GDPR (necessary to fulfil the Controller's legal obligation, i.e. to recognise a valid complaint).

**The duration of the Data processing:** until the complaint procedure is completed and then until the expiration of the statute of limitations for claims under the agreement, as well as for the purpose of possible establishment and investigation of claims – until the expiry of the statute of limitations for claims, and for the purpose of fulfilling accounting and tax obligations and for archival and statistical purposes;

#### **4. Manage correspondence, including e-mail and traditional correspondence**

**Personal data scope:** e-mail address and other Personal data contained in the content of the correspondence. The Controller also processes the IP number from which the message was sent.

Provision of data is voluntary, but necessary in order to receive a reply to the message. The consequence of not providing the Personal data is the inability to establish correspondence and obtaining response to the message.

**Legal basis:** Article 6 (1) (f) GDPR (necessity in order to realise the legitimate interest of the Controller, i.e. to reply to the message sent, to communicate with the User, to conduct traditional correspondence and e-mail with the User and to provide services to the User); Article 6 (1) (a) GDPR (consent expressed by voluntary action – sending a message); Article 6 (1) (b) GDPR (necessity to act upon request).

The User may at any time withdraw consent to the processing of Personal data, without prejudice to the lawfulness of the processing carried out on the basis of the consent prior to its revocation.

**The duration of the Data processing:** until you successfully object or withdraw your consent or the purpose of the processing is achieved, and thereafter for archival purposes to document the course of correspondence.

#### **5. Implementation of tax and accounting obligations**

**Personal data scope:** Personal data required to issue the sales document: name and surname, business name, address, VAT number, tax identification number.

Provision of data is voluntary, but necessary in order to conclude the agreement and fulfil the Controller's accounting and tax obligations. The consequence of not providing the Personal data is the inability to conclude the agreement and obtaining sales document.

**Legal basis:** Article 6 (1) (c) of the GDPR (tax and accounting obligations of the Controller).

**The duration of the Data processing:** for the period of time required by law for the retention of documents other than tax and accounting documents, and until the statute of limitations of any claims related to the fulfilment of accounting and tax obligations.

## **6. Self-marketing**

**Personal data scope:** anonymous analytical and statistical data collected by external tools provided by third parties.

**Legal basis:** Article 6 (1) (f) of the GDPR (legitimate interest of the Controller in carrying out marketing activities).

**The duration of the Data processing:** pending objections.

## **7. Archival and evidentiary purposes, including the establishment, investigation or defence of claims**

**Personal data scope:** archiving may or may not include certain Personal data relating to a specific agreement between the User and the Controller, which may give rise to certain claims in the future.

**Legal basis:** Article 6 (1) (f) of the GDPR (legitimate interest of the Controller in being able to prove certain facts in the future, including for the purpose of establishing, investigating or defending against claims).

**The duration of the Data processing:** until the statute of limitations for claims under the various titles or the loss of usefulness, as provided by law.

## **8. Analysis and statistics of User behaviour on the Website**

**Personal data scope:** Anonymous statistical data about the User's behaviour on the Website and, in the case of a registered User, also the User's account data.

**Legal basis:** Article 6 (1) (f) of the GDPR (the Administrator's legitimate interest in analysing information about User's behaviour on the Website, including information collected automatically, such as Google Analytics or cookies, in order to optimise the Controller's activities, including marketing and advertising activities).

**The duration of the Data processing:** pending objections.

## **9. Use of the third parties services**

**Personal data scope:** Personal data necessary for payment processing, e.g. name, surname, business name, address, e-mail address, VAT number, tax identification number; Personal data necessary for the provision of services by the third parties, e.g. name, surname, business name, e-mail address, address, IP address.

**Legal basis:** Article 6 (1) (a) of the GDPR (voluntary consent of the User). The User may at any time withdraw consent to the processing of Personal data, without prejudice to the lawfulness of the processing carried out on the basis of the consent prior to its revocation.

**The duration of the Data processing:** until the termination or expiry of the data processing agreement (DPA) between the Controller and the third party. Until the consent is withdrawn or the purpose of the processing has been achieved, and then until the expiration of the period of time required by law for its lawful processing, including the statute of limitations for claims.

The Data processing may also take place after the expiry of the aforementioned processing time, until the expiry of the statute of limitations for any claims, or as long as it is possible or required under applicable law. The expiration of the processing time under one legal basis does not mean that Personal data may not be processed under another legal basis.

### **The receivers of Personal data and transfer of the Personal data to third countries (outside the EEA)**

In connection with the Controller's activities and in order to ensure the effective provision of the services, the Controller will in some areas use the assistance of carefully selected third parties, primarily, but not exclusively, from the European Economic Area. Each entity with which the Controller collaborates shall ensure the protection of Personal data in accordance with applicable law and the provisions of the Privacy Policy and shall be obliged to maintain the

confidentiality of Personal data and the means of securing it. In situations where it is required by law, the Controller shall enter into data protection agreements.

Recipients of Personal data processed by the Controller are:

1. hosting provider;
2. the entity providing the invoicing system;
3. accounting office;
4. providers of IT tools and solutions;
5. law firm.

Recipients of the Personal data may also be:

1. technical services providers, if the technical work carried out relates to the areas where the Personal data is located;
2. entities providing legal services;
3. entities providing IT services, if the technical work carried out relates to the areas where the Personal data is located;
4. other sub-contractors if the scope of the tasks assigned to them requires access to the Personal data.

The Controller reserves the right to disclose selected information about the User to authorised, competent authorities or third parties who request such information on the basis of the relevant legal basis and in accordance with the provisions of the applicable law.

The Controller uses the services of international companies. Therefore, some of the User's Personal data may be processed in third countries (outside the European Economic Area). The entities with which the Controller cooperates ensure the protection of Personal data and security procedures in accordance with the requirements of the GDPR. You can read about the privacy policies of these entities by clicking on the appropriate link:

1. <https://www.paddle.com/legal/privacy>;
2. <https://packagist.com/about/privacy>

#### **Automated Data processing, profiling**

Your Personal data may be processed by automated means, using tracking tools and technologies (including profiling), but this will not have any legal effect or otherwise materially affect you. The information collected will remain anonymous and will not be combined with your other personal information in a way that allows you to be identified. The exception to this is if you have a user account. However, this does not materially affect you. Automated processing, including profiling, may involve analysing and evaluating your Personal data in order to



tailor the content displayed to you and the products offered to you according to your User profile and your preferences.

## **Your rights**

In accordance with the GDPR, you have the right to:

1. receive confirmation of Data processing and information that constitutes an obligation to provide information (Article 15 (1) of the GDPR);
2. access your Personal data and receive a copy of it;
3. request rectification Personal data;
4. request the deletion of Personal data (if justified under Article 17 (1) and (3) of the GDPR);
5. restrict Data processing (if justified under Article 18 (1) of the GDPR);
6. object to Data processing (article 21 of the GDPR);
7. withdraw consent to Data processing (in case of processing based on consent). Withdrawal of consent does not affect the Data processing until the withdrawal is notified. It also does not entitle you to request the deletion of data processed for archival or evidentiary purposes;
8. data portability (Article 20 of the GDPR);
9. lodge a complaint with the President of the Personal Data Protection Office.

The above rights are not absolute, as they may be subject to limitations under applicable law.

If you have any questions or concerns about your privacy, please contact the Controller using the contact information provided in the Privacy Policy. In your message, please state your request and the reasons for it. Your request will be processed within 30 days.

You may also revoke your consent to the processing of your Personal data. This revocation will not affect the processing of the Personal data until you notify us of the revocation. Withdrawal of consent does not entitle you to request the deletion of Personal data processed for archival and evidentiary purposes.

## **Cookies and tracking technologies**

Cookies (so-called 'cookies') are computer data, in particular text files, stored on the User's devices. They are used to enable the correct use of the Website's functions (adaptation of the content of the Website to the User's preferences, optimisation of the use of the Website, maintenance of the User's session). Cookies make it possible to recognise the User's device and to display the site in a manner appropriate to the User's needs. They are also used for analytical, statistical and advertising purposes. Cookies may be read by the Controller's system (own cookies) or by third party system (external cookies).

Cookies may be deleted when the browser is closed (session cookies) or they may be stored in order to remember the User's browser the next time the site is visited (persistent cookies). Cookies usually contain the name of the Website from which they originate, the time they are stored on the device and a unique number relating to the User's visit to the Website and the activities carried out by the User.

The Website uses the following types of cookies:

1. essential cookies (cookies used to provide the User with the services and functionalities available on the Website. Through the Website, the essential cookies may be installed by the Controller);

#### **Consent to cookies and cookie settings**

On your first visit, the Website will display information about cookies and allow you to change your browser settings. Failure to do so and continued use of the Website will constitute consent to the use of cookies in accordance with the User's browser settings. The User may change the cookie settings (all or some) at any time. Detailed information on the possibility and methods of handling cookies can be found in the settings of your web browser. However, disabling or restricting the use of cookies may affect some use of these features. You can also use the incognito mode of your browser, in which case the history of your visit to the Website will not be stored and any cookies created during your visit to the Website in incognito mode will be deleted when you close your browser.

Cookie policy on the website is managed by cookieeyes.com.

#### **Server logs**

Using the Website means sending a request to the server that stores the Website's data. The request is stored in server logs on the server. The logs are used to administer the Website and include IP address, server date and time, web browser and operating system information. The logs are not used to identify the User.

#### **Privacy policy update**

The Controller reserves the right to modify the content of Privacy Policy, in particular when the development of the Website, technological requirements or changes in the law so require. The User's Personal data will be processed in accordance with the Privacy policy in force at the time of Data processing. The User with an active account on the Website will be informed of the change in the content of the Privacy Policy via e-mail.