

## **Privacy policy**

### **§ 1. General provisions**

1. This Privacy Policy (hereinafter referred to as the "Policy") applies to the website with domain [www.scrapingfish.com](http://www.scrapingfish.com) (hereinafter referred to as the "Website" and "Service") and is intended to inform you about the purposes of collecting Personal Data and its collection and use.
2. In this Policy, "Personal Data" means any information about an identified or identifiable natural person.
3. In this Policy, "User" means any natural person, including those conducting a business or professional activity on their own behalf, and a natural person representing a legal person or an organizational unit that is not a legal person, which is granted legal capacity by law, using the Service.
4. In this Policy, "GDPR" means Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation).

### **§ 2. Controller of Personal Data**

1. The controller of the Personal Data processed through the Website is Paweł Kobołek conducting business activity under the name "Narf Paweł Kobołek" with its registered office in Zalesie at the address: Zalesie nr 86a, 21-400 Łuków, Tax Identification Number: 8252184883, National Business Registry number: 382135882 (hereinafter: "Controller").
2. Contact with the Controller is possible through the contact form, available on the Website <https://scrapingfish.com/contact>, at the address indicated in § 2 section 1 of the Policy or at [pawelkobołek@narf.ai](mailto:pawelkobołek@narf.ai).
3. The Controller shall take special care to respect the privacy of Users and persons using the Website without creating a User account.

### **§ 3. Type of processed data, purposes and legal basis**

1. Personal Data of persons using the Website without creating a User account shall be used only for analytical purposes and to ensure the operation of the Website.
2. When using the Website, additional information may be collected, in particular: the IP address assigned to the User's computer or the external IP address of the Internet provider. The collected data is not associated with specific individuals browsing the Website.
3. Persons using the Website are not required to provide Personal Data, but providing Personal Data is necessary to conclude a contract for the provision of electronic services. Refusal to provide Personal Data will result in the inability to conclude an agreement.
4. Below is a detailed description of Users' Personal Data that are processed by the Service, with an explanation of the purposes and legal basis for their processing.

| Action   | Data processed   | Purposes and legal basis of data processing, data retention period  |
|--|--|---|
| Purchase of a service provided through the Website | - E-mail address   | <p><b>Purpose of processing:</b> conclusion of the contract for the provision of electronic services with the Service.</p> <p><b>Legal basis:</b> performance of an agreement to which the data subject is a party (Article 6(1)(b) GDPR).</p> <p><b>Storage period:</b> for the period necessary for the performance of the agreement, and thereafter for the period resulting from the statute of limitations for potential claims (e.g., three years if the Personal Data relate to other entrepreneurs with whom contracts have been concluded in connection with the conduct of business activities - Article 118 of the Civil Code).</p>  |
| Payment transactions, issuance of an invoice       | -E-mail address<br>-NIP<br>In addition, in order to process payments, it will be necessary to provide other Personal Data required by the services cooperating with the Service. | <p><b>Purpose of processing:</b> payment processing, invoicing, bookkeeping.</p> <p><b>Legal basis:</b> processing is necessary for the performance of a contract to which the data subject is a party (Article 6(1)(b) GDPR); processing is necessary for the fulfillment of a legal obligation incumbent on the Administrator (Article 6(1)(b) GDPR); processing is necessary for purposes arising from the legitimate interests pursued by the Administrator (Article 6(1)(f) GDPR).</p> <p><b>Storage period:</b> the period necessary for the execution of the payment transaction, and after that period for the period resulting from the statute of limitations for potential claims (e.g. three years if the Personal Data relate to other entrepreneurs with whom contracts have been concluded in connection with the conduct of business activities - Article 118 of the Civil Code);</p> <p>data processed for tax purposes are stored until the expiration of the tax liability period (this period according to Art. 70 § 1 of the Tax Ordinance is 5 years, calculated from the end of the calendar year in which the deadline for payment of the tax in question has passed);</p> <p>data processed for accounting purposes will be kept for the period of storage of accounting books specified in the Accounting Act (according to Article 74 § 3 of the Accounting Act, the deadline is 5 years from the beginning of the year following the year to which the collection relates).</p> |

|                           |   |  |
|---------------------------|---|--|
| User queries              | -E-mail address   | <p><b>Purpose of processing:</b> to respond to inquiries from the User, to contact the User in order to inform him/her of changes in the functioning of the Website, changes in the Terms of Service or Privacy Policy in a timely manner.</p> <p><b>Legal basis:</b> user's consent (Article 6(1)(a) GDPR), Collector's legitimate interest (Article 6(1)(6) GDPR) in responding to Users' inquiries.</p> <p><b>Storage period:</b> where the legal basis for data processing is the User's consent, Personal Data will be stored until revocation, restriction or other actions on the part of the User limiting consent;</p> <p>where the legal basis for data processing is the legitimate interest of the Administrator, Personal Data will be stored until an effective objection is made.</p> |
| Complaints                | -E-mail address<br>-Name and surname<br>-Domicile address<br>-Phone number<br>-Bank account number  | <p><b>Purpose of processing:</b> processing of complaints and claims made, enabling the User to withdraw from the contract.</p> <p><b>Legal basis:</b> fulfillment of the Collector's obligation (Article 6(1)(c) GDPR).</p> <p><b>Storage period:</b> the period necessary for the execution of the payment transaction, and after that period for the period resulting from the statute of limitations for potential claims (e.g., three years if the Personal Data relate to other entrepreneurs with whom contracts have been concluded in connection with the conduct of business activities - Article 118 of the Civil Code).</p>  |
| Users' use of the Website | -The IP address assigned to the User's computer or the external IP address of the Internet provider (the IP address will be considered Personal Data only if it is possible to identify the User on the basis of this address). | <p><b>Purpose of processing:</b> analysis of data collected automatically when Users use the Website in order to adapt the Website to the needs and behavior of Users.</p> <p><b>Legal basis:</b> legitimate interest of the Collector (Article 6(1)(f) GDPR).</p> <p><b>Storage period:</b> the period necessary to analyze the data collected when the Website is being used.</p>  |

### § 3. Entrusting Personal Data to third parties.

1. User's Personal Data shall be transferred to the service providers used by the Website in order to provide services of the highest possible quality. Service providers to whom Personal Data

is transferred, depending on contractual arrangements and circumstances, are subject to the Collector's instructions as to the purposes and means of processing such data (processors).

2. The following is a list of processors:

1) Stripe Payments Europe Limited

Users' Personal Data are entrusted to Stripe Payments Europe Limited for the purpose of processing payment transactions for the service provided through the Service. Stripe Payments Europe Limited shall ensure that Personal Data is processed in a lawful manner, in particular in accordance with the GDPR. Detailed information is available in the content of the privacy policy available at: <https://stripe.com/en-pl/privacy#9-contact-us>.

2) IFIRMA S.A. based in Wrocław, ul. Grabiszyńska 241B, 53-234 Wrocław, registered in the National Court Register in Wrocław kept by the District Court for Wrocław-Fabryczna, VI Economic Department of the National Court Register, under KRS number 0000281947, NIP: 8981647572, REGON: 931082394.

Users' Personal Data are entrusted for the purpose of issuing invoices and accounting service of transactions carried out through the Service. IFIRMA S.A. ensures the processing of Personal Data in a accordance with the GDPR. Detailed information is available in the content of the privacy policy available at: <https://www.ifirma.pl/RODO/polityka-prywatnosci-ifirma-pl>.

3) Twilio Ireland Limited with its registered office in Dublin at 25-28 North Wall Quay, Dublin 1, Ireland.

Users' Personal Data are entrusted for the purpose of tracking Users' activity on the Website and managing contact with the User, in particular for the purpose of sending emails with a summary of the purchase transaction of the Service available on the Website. Twilio Ireland Limited ensures that Personal Data is processed in a manner that complies with the law, in particular with the GDPR. Detailed information is available in the content of the privacy policy available at: <https://www.twilio.com/legal/privacy>.

3. If a request is made, the Processor shall make Personal Data available to authorized state authorities, in particular to organizational units of the Prosecutor's Office, the Police, the President of the Personal Data Protection Office, the President of the Office for Competition and Consumer Protection or the President of the Office of Electronic Communications.

#### **§ 4. User's Rights.**

1. Data subjects shall have the following rights:

- 1) the right to information about the processing of Personal Data - on this basis, the Collector shall provide the person making such request with information about the processing of Personal Data, including, in particular, the purposes and legal grounds for the processing, the scope of the data held, the entities to which the Personal Data are disclosed and the planned date for their deletion;
- 2) the right to obtain a copy of the data - on this basis, the Collector shall provide a copy of the processed data that concerns the person making the request;

- 3) the right to request rectification of data - on this basis, the Collector removes any inconsistencies or errors regarding the processed Personal Data, and completes or updates it if it is incomplete or has changed;
  - 4) the right to erasure - on this basis, you can request the erasure of data whose processing is no longer necessary to carry out any of the purposes for which they were collected;
  - 5) the right to restrict processing - on this basis, the Collector shall cease performing operations on Personal Data, except for operations consented to by the data subject, and shall cease storing them, in accordance with the adopted retention rules (i.e., the duration of data storage), or until the reasons for restricting data processing cease to exist (e.g., a decision is issued by a supervisory authority authorizing further data processing);
  - 6) the right to data portability - on this basis, to the extent that the data are processed in connection with a concluded contract or given consent, the Collector shall release the data provided by the data subject in a computer-readable format. It is also possible to request that the data be sent to another entity - provided, however, that there are technical capabilities in this regard both on the part of the Collector and that other entity;
  - 7) the right to object to the processing of data for marketing purposes - the data subject may object at any time to the processing of Personal Data for marketing purposes, and there is no need to justify such objection;
  - 8) the right to object to other purposes of processing – the data subject may object at any time to the processing of Personal Data on the basis of a legitimate interest of the Collector (e.g. for analytical or statistical purposes); an objection in this regard should contain a justification and is subject to the Collector’s assessment;
  - 9) the right to withdraw consent – if the data are processed on the basis of consent, the data subject has the right to withdraw it at any time, which, however, does not affect the lawfulness of the processing carried out before the withdrawal of that consent;
  - 10) right to complain – if the processing of Personal Data is deemed to violate the provisions of the GDPR or other data protection laws, the data subject may file a complaint with the President of the Office for Personal Data Protection.
2. A request for the exercise of the rights of data subjects may be submitted:
    - 1) in writing by sending a letter to: Zalesie No. 86a, 21-400 Łuków;
    - 2) by e-mail to: pawel.kobojek@narf.ai ,
  3. The request should, as far as possible, indicate precisely what the request concerns, i.e. in particular:
    - 1) what entitlement the person making the request wants to exercise,
    - 2) what processing the request relates to (e.g. use of a specific service or functionality within the Service),
    - 3) what processing purposes the request relates to (e.g., analytical purposes).
  4. If the submitted request is formulated in such a way that it is not possible to determine its content or for other reasons it is not possible to fulfill the request, the Collector will request additional information from the requester.
  5. The request will be answered within 1 month from its receipt. If it is necessary to extend this period, the Collector will inform the applicant of the reasons for such extension.
  6. The response will be provided to the e-mail address from which the application was sent, and in the case of applications sent to the Collector’s registered office address - by letter

to the address indicated by the applicant, unless the content of the letter indicates a desire to receive a response to the e-mail address and if such an e-mail address is indicated in the application.

**§ 5. Final provisions.**

1. The content of the Policy may be amended in the same manner.
2. The Policy shall be governed by the laws of the Republic of Poland.
3. In matters not regulated by the Policy, the relevant provisions of Polish law and GDPR shall apply.