

PRIVACY POLICY

This Privacy Policy is a document related to the Terms of Use provided on the Website available here <https://spoolfinder.com/docs/terms-of-service-en.pdf> Definitions of the terms used in the Privacy Policy were included in the Terms of Use. The provisions of the Terms of Use are applied accordingly.

The Policy is for information purposes and serves to satisfy the information obligations imposed on the data controller under the GDPR, i.e. Regulation (EU) 2016/679 of 27 April 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).

1. PERSONAL DATA CONTROLLER

- 1.1 The Controller of the Users' personal data is Maciej Marczuk, pursuing a business activity under the business name "Maciej Marczuk," conducted at the address: ul. Królowej Marysieńki 21/89, 02-954 Warszawa, Tax Identification Number NIP: 9512010408, National Business Registry Number REGON: 141113373 ("Data Controller").
- 1.2 Data Controller's contact details: maciejmarczuk@spoolfinder.com; phone: +48 572 830, 47, local address as stated above.

2. DATA PROCESSING METHOD

- 2.1. The scope, purposes, and legal grounds for the processing of the Users' personal data are presented in the table below.

Purpose	Scope of data	Legal basis	Processing period
providing access to the Website	IP address, device identifier	Article 6(1)(b) of the GDPR – processing is necessary for the performance of the Agreement or undertaking actions upon request of the data subject prior to concluding the Agreement	until lapse of the period of limitation applicable to claims connected with access to the Website and User's actions within the Website, calculated from the time of the last visit on the Website. In the absence of a reasonable premise that the data need to be processed to protect against claims or to pursue claims, the data will be deleted no later than 3 months from obtaining the IP address.
setting up the Account	first name, e-mail address	Article 6(1)(b) of the GDPR – processing is necessary for the performance of the Agreement or undertaking actions upon request of the data subject prior to concluding the Agreement	until lapse of the period of limitation of claims connected with the creation of the Account. If there is no need to process the data for this purpose, they will be deleted immediately after the Account is deleted (when the Website's backups containing the above-mentioned personal data are overwritten).

operating the Account	username, first name, e-mail address, image, other personal data voluntarily provided by the Registered Customer within the Account	Article 6(1)(b) of the GDPR – processing is necessary for the performance of the Agreement or undertaking actions upon request of the data subject prior to concluding the Agreement	Until the Registered Customer deletes the Account and until the lapse of the period of limitation of claims connected with the Account operating service. In the absence of a reasonable premise that the data need to be processed to protect against claims or to pursue claims, the data will be deleted no later than 1 month from deleting the Account.
enabling the use of the Services	first name, e-mail address, ID in the Account	Article 6(1)(b) of the GDPR – processing is necessary for the performance of the Agreement or undertaking actions upon request of the data subject prior to concluding the Agreement	until the termination of the Agreement referring to Services or the lapse of the period of limitation of claims connected with such an Agreement. In the absence of a reasonable premise that the data need to be processed to protect against claims or to pursue claims, the data will be deleted upon termination of the Agreement.
providing technical support	IP address, contact details	Article 6(1)(f) of the GDPR – legitimate interest of the Data Controller that consists in providing technical support for the Website users	for the duration of the support expected by the User
contact with the Users, responding to queries	first name, e-mail address, other personal data voluntarily provided by the User in the e-mail correspondence or in the form	Article 6(1)(f) of the GDPR – legitimate interest of the Data Controller that consists in responding to queries and correspondence provided directly by the data subjects	until correspondence ends or the User objects
sending commercial information through the browser in the form of push notifications	ID in the Account	Article 6(1)(a) of the GDPR – consent given by the Registered Customer	until the data ceases to be useful or the Registered Customer withdraws the consent
protecting against claims, raising claims	e-mail address, first and last name, other data voluntarily	Article 6(1)(f) of the GDPR – legitimate interest of the Data Controller that consists	until lapse of the period of limitation applicable to claims connected with

	provided by the data subject	in protecting against claims and raising claims	access to the Website and activities within it
handling reports regarding illegal content	e-mail address, first and last name, other data voluntarily provided by the person reporting illegal content	Article 6(1)(f) of the GDPR – legitimate interest of the Data Controller that consists in informing about handling reports regarding illegal content	until the report is fully verified

- 2.2. If the Data Controller is advised that the User uses the Website in violation of the Terms of Use or applicable provisions of the law (unauthorised use), then the Data Controller may process the User's personal data in a scope required for establishing the liability of the User.
- 2.3. The provision of personal data within the Website is voluntary, but failure to provide them will prevent contact, creating the Account, using the Services, or taking any other action by means of the Website. This applies in particular to personal data marked as required.
- 2.4. Your personal data will not, as a rule, be transferred to third countries (beyond the European Economic Area).
- 2.5. In the event of a transfer of personal data to the US, the legal basis for such transfer will be an appropriate agreement concluded with an entity participating in the Data Privacy Framework or standard contractual clauses in line with the Commission's implementing decision.
- 2.6. The Data Controller will not profile Users. Neither will the Data Controller carry out automated decision-making based on the Users' personal data.

3. RECIPIENTS OF DATA

- 3.1. The Data Controller may entrust the processing of personal data to third parties for the purpose of performing the activities indicated in the Terms of Use and supporting the Users. In such a case, the recipients of the Users data may involve the provider of hosting, the e-mail operator, the supplier of communication tools a law firm, an accounting firm, the entities providing solutions for researching traffic on the website and marketing activities.
- 3.2. The personal data collected by the Data Controller may also be disclosed to: competent state authorities upon their request on the basis of the relevant legal provisions or other persons and entities – in the cases prescribed in the legal provisions.
- 3.3. Each entity to which the Data Controller transfers the Users' personal data for processing on the basis of a personal data transfer agreement guarantees an adequate level of security and confidentiality of the processing of personal data. The entity processing the Users' personal data on the basis of the data transfer agreement may process such personal data through another entity only upon prior consent of the Data Controller.
- 3.4. Disclosing personal data to unauthorised entities under this Privacy Policy may take place only upon the User's prior consent.

4. RIGHTS OF DATA SUBJECT

- 4.1. The User has the right to: (a) remove the collected personal data referring to him/her both from the system of the Data Controller and of the bases of the entities with whom the Data Controller has co-operated, (b) restrict data processing, (c) portability of his/her personal data, including the right to receive them in a structured form; (d) request the Data Controller to provide access to his/her personal data and rectify them, (e) object against the processing; (f) revoke the consent to the personal data processing at any time without affecting the legality of the data processing carried out on the basis of the consent before it is revoked; (g) file a complaint against the Data Controller to the supervisory authority (President of the Polish Personal Data Protection Office [Urząd Ochrony Danych Osobowych]).
- 4.2. In order to exercise his/her rights, the User can contact the Data Controller via the e-mail address indicated in clause 1.2. or via the contact form available on the Website.

5. SECURITY

- 5.1. The Data Controller applies technological and organisational means in order to secure the processing of personal data adequately to the threats and category of data to be secured, in particular, through technical and organisational means the Data Controller secures data against being disclosed to unauthorised persons, taken over by an unauthorised person, processed in violation of the law, and changed, lost, damaged, or destroyed. The Data Controller applies SSL certificates. The set of collected Users' personal data is stored on a secured server. Data are also secured by the Data Controller's internal procedures related to the processing of personal data and information security policy.
- 5.2. The Data Controller has also implemented appropriate technical and organisational means, such as pseudonymisation, designed to effectively enforce the data protection principles, such as data minimisation, and for the purpose of providing the processing with necessary safeguards, so as to meet the GDPR requirements and protect the rights of data subjects.
- 5.3. Please be advised that using the Internet and services provided by electronic means may pose a threat of malware breaking into the User's ICT system and device, as well as any other unauthorised access to the User's data, including personal details, by third parties. In order to minimize such threats, the Users should use appropriate technical security means, e.g. use updated antivirus programs or programs securing the identification in the Internet. In order to obtain detailed and professional information related to security in the Internet, the Data Controller recommends taking advice from entities specialising in such IT services.

6. COOKIES

- 6.1. In order to ensure the proper functioning of the Website and to provide the Users with a comfortable experience when using its resources, the Data Controller uses only cookies that are necessary to maintain the basic functions of the Website and to ensure the proper display and operation of the website (e.g. session storage, security, settings management).
- 6.2. Due to the fact that the Website uses only technical cookies, prior consent of the User for their installation and use is not required.
- 6.3. The Website does not use cookies for analytical, statistical, marketing, content personalisation, or User profiling purposes.
- 6.4. The User can individually manage cookie settings in his/her browser, but disabling them may adversely affect the proper functioning of the website.

7. FINAL PROVISIONS

- 7.1. This Privacy Policy comes into effect on 2 December 2025.