

# PRIVACY POLICY

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This document is an English translation of the official and binding Polish document. Your use of our services constitutes your agreement to be bound by the rights and obligations described in this translation. The interpretation and application of these terms are exclusively governed by Polish law. Should any inconsistency arise between this translation and the Polish original, the Polish version is the sole authoritative source for all purposes.

The privacy policy is part of the Terms of Service.

We are committed to protecting your privacy and being transparent about the collection and use of your personal data. This Privacy Policy explains how we handle information regarding users of our Service. By using our Service, you entrust us with your data. We appreciate this trust and take its protection seriously.

## § 1. Who We Are

1. The controller of your personal data is us, Hetman Maksymilian Sawicz, with its registered office at ul. Żelazna 2, 40-851, Katowice, Poland, Tax Identification Number (NIP): 6343062073, Statistical Identification Number (REGON): 543011486, email address: support@hetman.app

## § 2. What Data We Collect

1. In connection with providing and improving our Services, we may collect the following general categories of data:
  - Identification and Contact Data: Information necessary to create and manage a User Account, including email addresses, and other data you may voluntarily provide to us. In the case of logging in via the Identity Provider, the Service receives from it and processes only the email address and the internal user identifier (UUID) assigned by the Identity Provider. The Service does not store user passwords - they are managed exclusively by the Identity Provider.
  - Data Necessary for the Operation of the Service: To enable you to use the email forwarding function, we process information related to operations performed by the system. This includes the automatic, technical processing of the content and metadata of email messages (such as headers) solely for the purpose of their correct forwarding and security verification. No email content is read by the controller.
    - For users who have installed the optional extension, which is one of the functions offered by the Service, enabling auto-completion of Relays on any website:
      - When creating a Relay, we collect and store the URL of the website on which it was created. Furthermore, when the user visits various websites, their extension may send a verification request to our Service, containing the URL of the currently viewed page, in order to check if there are active Relays associated with the User on that page.
  - Technical Data and Service Usage Data: Information automatically recorded when using the Service, such as IP address, browser type, device details, and website usage patterns.
  - Payment and Billing Data: Information necessary to process subscription payments, however, detailed data, such as credit card numbers, are processed solely by our external payment provider, Stripe.

## § 3. How and for What Purpose We Process Your Data

1. We process your data for the following purposes:
  - Provision and Maintenance of the Service: To create and manage your account (including automatically creating a User Account upon first login via the Identity Provider), ensure the operation of the email forwarding Service, perform Service functions, and communicate with you regarding account and technical matters (e.g., notifications about changes).
  - Service Development and Analytics: To analyze how users use the Service, diagnose technical problems, and improve the features and performance we offer.
  - Security and Fraud Prevention: To monitor and analyze activity to detect, prevent, and respond to fraud, abuse, security issues, and technical problems, thereby protecting our users and our Service.
  - Payment Processing: To process transactions and collect fees for Paid Services.

## § 4. Legal Basis for Processing

1. ur processing of your data is based on the following legal grounds:
  - Performance of a Contract: We process your data because it is absolutely necessary to provide the Service. When you create an account (through first login) and accept our Terms of Service, you enter into a contract with us. To fulfill this contract and provide you with a functioning Service, we must process certain data.
  - Legitimate Interest: Processing necessary for our legitimate interests, which do not override your rights, for security purposes, direct marketing of our own Service, and Service analytics and development.

## § 5. Who Has Access to Your Data (Sub-processors)

1. To ensure the reliable operation of our Service, we use the services of trusted partners (data processors). We have entered into data processing agreements with them that guarantee a high level of protection.
  - Stripe: Our payment processing partner. All payments are processed directly by Stripe. We do not store or process full credit card or debit card data on our servers. (<https://stripe.com/en-pl/privacy>)
  - Railway: Our hosting service provider for the Service. All data stored with Railway is physically located in a data center in Amsterdam (European Economic Area). (<https://railway.com/legal/privacy>)
  - OVH SAS: Our hosting service provider for the Service. This server is located in a data center in Germany (European Economic Area). (<https://www.ovhcloud.com/pl/terms-and-conditions/privacy-policy/>)
  - Cloudflare: We use Cloudflare's services to enhance the security, performance, and reliability of our Service. (<https://www.cloudflare.com/privacypolicy/>)

## § 5a. Identity Provider

1. Logging in to the Service occurs via an external Identity Provider.
2. To enable logging in, the Service receives the User's email address and the internal user identifier (UUID) from the Identity Provider. This identifier is used solely to identify the User within the Service.

3. The authentication process, including identity verification and password management, takes place entirely on the Identity Provider's side and is subject to its terms of service and privacy policy.
4. We encourage Users to review the privacy policy of the Identity Provider, available at <https://idp.hetman.app>, which describes in detail how personal data is processed within the authentication service.

## § 6. Transfer of Data Outside the European Economic Area (EEA)

1. We make every effort to ensure that your data is processed within the territory of the European Economic Area (EEA). However, some of our partners (e.g., Stripe) may process data in the United States. In such cases, we rely on appropriate legal mechanisms, such as European Commission adequacy decisions (e.g., the EU-US Data Privacy Framework) or Standard Contractual Clauses, to ensure the same level of protection as within the EEA.

## § 7. How We Secure Your Data

1. The security of your data is our utmost priority. We implement appropriate technical and organizational security measures to protect your data from unauthorized access, loss, or destruction.
2. All identifiable data is protected using modern cryptographic methods, including strong encryption (AES-256) and hashing. We continually review and improve our security practices.

## § 8. How Long We Retain Your Data

1. We retain your data only for as long as necessary to achieve the purposes for which it was collected, including to satisfy legal, accounting, or reporting requirements. The retention period depends on the nature of the data and the purpose of processing.
2. When data is no longer needed, we securely delete it or anonymize it so that it can no longer be associated with you. You also have the right to request the deletion of your data.

## § 9. Your Data Protection Rights

1. In accordance with applicable data protection laws, you have several rights that you can exercise towards us:
  - Right of Access: You may request a copy of your personal data.
  - Right to Rectification: You may request the correction of inaccurate or completion of incomplete data.
  - Right to Erasure ("right to be forgotten"): You may request the deletion of your data.
  - Right to Restriction of Processing: You may request the temporary suspension of data processing in certain situations.
  - Right to Data Portability: You may receive your data in a structured format and transmit it to another controller.
  - Right to Object: You may object to the processing of data based on our legitimate interest.
2. To exercise any of these rights, please contact us using the details provided in the "Contact" section below. We will respond to your request without undue delay, and no later than within one month.
3. You also have the right to lodge a complaint with a supervisory authority (the President of the Personal Data Protection Office) if you believe that we are processing your data unlawfully.

## § 10. Changes to the Privacy Policy

1. We may update this Privacy Policy periodically to reflect changes in our practices or for other operational, legal, or regulatory reasons. We will notify you of any material changes through the Service or by email. We encourage you to review this page periodically.

## § 11. Contact

1. If you have any questions, concerns, or wish to exercise your data rights, please contact us:
  - Email: [support@hetman.app](mailto:support@hetman.app)
  - Mail: Hetman Maksymilian Sawicz, ul. Żelazna 2, 40-851, Katowice, Polska.