

Privacy Policy eAuditor cloud ®

V 1.1 / 19.09.2025

Privacy Policy

We are committed to the privacy and security of the data you entrust to us. This Privacy Policy governs the collection, use and sharing of personal information in connection with your use of the Service. Your use of the Service constitutes your acceptance of this policy.

Definitions

For the purposes of this Privacy Policy::

- **Account** means a unique account created to access our Service or any part thereof;
- **Application** means the software provided by the Company and downloaded to any electronic device, named eAuditor cloud;
- **Company** (referred to as “Company” in this Agreement) refers to BTC Spółka z ograniczoną odpowiedzialnością, 38 1 Maja Street, 71-627 Szczecin, Poland;
- **Data Administrator** means the Company as a legal entity that alone or jointly with others determines the purposes and means of processing Personal Data, in accordance with the General Data Protection Regulation (GDPR). This Privacy Policy applies where we act as a Data Controller with respect to Personal Data;
- **Device** means any device that allows access to the Service, such as a computer, cell phone or digital tablet;
- **Personal Information** means any information relating to an identified or identifiable natural person. For the purposes of the GDPR, Personal Data includes information such as name, identification number, location data, online identifier, or one or more factors that identify a physical, physiological, genetic, mental, economic, cultural, or social identity;
- **The service** refers to the Application;
- **Service Provider** refers to any natural or legal person processing data on behalf of the Company. It refers to third-party companies or individuals hired by the Company to facilitate the Service, provide the Service on behalf of the Company, perform services related to the Service, or assist the Company in analyzing the use of the Service. For the purposes of the GDPR, Service Providers are considered Data Processors;
- **External Social Media Service** means any website or social network through which you may log in or create an account to use the Service;
- **Operating Data** means data collected automatically, both generated as a result of using the Service and from the infrastructure of the Service (e.g., the duration of a visit to the site);
- **You** means the individual using the Service or the company or other legal entity on whose behalf such individual uses the Service. For purposes of the GDPR, you may be referred to as a Data Subject or User because you are a person using the Service.

Scope of personal data collected

Personal information

We collect data that you provide to us directly when you use the Service. For example, data is collected when you register for the Service, create an account, fill out a form, participate in interactive features of the Service, contact customer service, or otherwise engage in communication with us.

The types of information we may collect include, but are not limited to:

- Email address,
- Name,
- Phone number,
- Name, address and billing information of the entity,
- Address, state, province, postal code, city,
- Any other information you choose to provide us with.

Personal information is never sold, rented, shared or used other than as necessary to provide the Service. If you do not provide the information required to provide the Service, your access to some features of the Service or to the entire Service may be restricted.

The Company discloses Personal Information only to those employees, contractors and affiliates who::

- a) require access to such information for processing on behalf of you and the Company,
- b) have committed in writing to a level of confidentiality no less than that set forth in this Privacy Policy.

Performance data

Usage data is collected automatically when you use the Service. They may include, but are not limited to, information such as your device's IP address, browser type and version, the pages of the Service you visit, the time and date of your visit, the time spent on each page, unique device identifiers, and other diagnostic data.

If you access the Service using a mobile device, the following information may also be automatically collected::

- type of mobile device used,
- the unique identifier of the mobile device,
- the IP address of the mobile device,
- operating system of the mobile device,

Privacy Policy eAuditor cloud ®

V 1.1 / 19.09.2025

- The type of web browser on the mobile device,
- Unique device identifiers and other diagnostic data.

Information from external social networks

The Company allows you to create an account and log in to the Service through the following third-party social networks:

- **Google, Microsoft, Apple** - If you choose to register or allow access to a third-party social media account, Personal Information associated with the account, such as name, email address, phone number, may be collected.

It is also possible to share additional information through a third party social media account. If you provide such information and Personal Data during registration or otherwise, you consent to the Company's use, sharing and storage of such information and Personal Data in accordance with this Privacy Policy.

Use of personal data

The Company may use personal information for the following purposes:

- **Provision, maintenance and improvement of the Service** - including monitoring of its use;
- **Performing the contract** - developing, complying with, and fulfilling the contract for the purchase of services or any other contract entered into through the Service;
- **Processing payments and facilitating the use of the Service;**
- **Contacting Users** - via email, phone calls, SMS or other forms of electronic communication (e.g. push notifications) to provide information about updates, features, products or services, including security-related notifications;
- **Customer support** - to prevent and resolve service, security or technical issues;
- **Providing marketing information** - including news, special offers and general information about similar products, services and events, unless you choose to opt-out;
- **Managing inquiries** - responding to comments, questions and requests made by users;
- **Enforcing the Terms of Service;**
- **Other purposes** - for example, analyzing data, identifying usage trends, evaluating the effectiveness of promotional campaigns, and improving the Service, products, marketing and user experience.

This policy does not restrict the use of aggregated or anonymized data that is no longer associated with a specific user of the Service.

Storage of personal data

The Company retains personal information for the period necessary to fulfill the purposes for which it was collected, in accordance with this Privacy Policy. In some cases, a longer retention period may be required or permitted, for example to:

- fulfill legal or contractual obligations,
- conducting audits and investigations,
- enforcing contracts and settling disputes.

Exploitation data is kept for a shorter period of time, unless it is used to enhance security, improve the functionality of the Service or there is a legal obligation to keep it longer.

Criteria for determining the period of data retention include:

- **Period necessary to provide the Service** - the data is kept for as long as it is necessary to provide access to the Service and fulfill the related purposes.
- **Account activity** - in case of inactivity for a certain period of time for the free plan, the data may be deleted; it is also possible to deactivate the account upon request.
- **Legal and regulatory requirements** - data may be retained for an extended period of time if required by applicable laws or data retention regulations.

Responsibility for data storage

The Company is not responsible for the storage of information provided by users or for the content provided through the Service. You are responsible for backing up your data and content related to the Service.

Transfer of Personal Data

User Data, including Personal Data, is processed at the Company's operational offices in the Republic of Poland and at other locations within the European Union.

For the purpose of payment processing, Personal Data only to the extent necessary to support the invoicing and payment process may be processed outside the EEA.

Disclosure of Personal Information

Under certain circumstances, the Company may be required to disclose your Personal Information if required to do so by law or in response to valid requests from public authorities (e.g., a court or government agency).

Privacy Policy eAuditor cloud ®

V 1.1 / 19.09.2025

- **Law enforcement agencies**

In certain cases, the Company may be required to disclose Personal Information if required to do so by applicable law or if a valid request is made by public authorities, such as courts or government agencies.

- **Other legal requirements**

The Company may disclose Personal Information in good faith if it determines that it is necessary to do so in order to:

- To fulfill a legal obligation,
- To protect and defend the rights or property of the Company,
- To prevent or investigate potential irregularities related to the Service,
- To protect the personal safety of users of the Service or the general public.
- To safeguard against legal liability.

Personal Data Security

The Company makes every effort to protect the information provided, using appropriate security measures - physical, electronic and organizational - designed to protect Personal Information from loss, unauthorized access, alteration or disclosure, regardless of where or how it is stored. The protection of Personal Information is a priority for the Company, but it is important to remember that no method of data transmission over the Internet or system of information storage can guarantee complete security. Despite the use of reasonable security measures, it is not possible to provide complete protection against potential threats.

Detailed information on the processing of Personal Data

Third-party service providers used by the Company may have access to Personal Information. These providers may collect, store, use, process and transmit information regarding activity on the Service in accordance with their own privacy policies.

E-mail Marketing

The Company may use Personal Information to contact Users with newsletters, marketing materials, promotional information and other content that may be of interest. It is possible to unsubscribe from receiving these messages by clicking the unsubscribe link in the email received, following the instructions contained therein, or contacting the Company.

Third-party service providers, such as:

- Mailerlite - Privacy Policy available at: <https://www.mailerlite.com/pl/legal/privacy-policy>.

Payments

The Company may offer paid products and/or services as part of the Service. In such cases, payment processing is done through third-party providers (payment processors).

The Company does not store or collect payment card data. This information is transferred directly to third-party payment processors whose privacy policies are set forth in their Privacy Policies. These processors use PCI-DSS standards administered by the PCI Security Standards Council, which is a joint initiative of brands such as Visa, Mastercard, American Express and Discover. PCI-DSS requirements ensure secure processing of payment data.

The Company may use suppliers such as:

- **Stripe** – Privacy Policy available at: Stripe Privacy Policy.

Privacy policy in compliance with RODO

Legal basis for processing personal data under the RODO

We may process your personal data on one or more of the following grounds:

- **Consent:** You have given your consent to the processing of personal data for one or more specified purposes.
- **Contract performance:** The provision of personal data is necessary for the performance of the contract concluded with you or for pre-contractual actions.
- **Legal obligations:** The processing of personal data is necessary to fulfill a legal obligation owed to our Company.
- **Vital interests:** The processing of personal data is necessary to protect your vital interests or the interests of another person.
- **Public interest:** The processing of personal data is related to the performance of a task carried out in the public interest or in the exercise of public authority entrusted to our Company.
- **Legitimate legitimate interests:** The processing of personal data is necessary for the fulfillment of the legitimate interests of our Company.

Your rights under RODO

We respect the privacy of your personal information and provide you with the opportunity to exercise the following rights:

- **The right to access your personal data** – You have the right to obtain information about what personal data we process.
- **Prawo - Right to rectification** - if your personal data is incomplete or incorrect, you have the right to correct it.

Privacy Policy eAuditor cloud ®

V 1.1 / 19.09.2025

- **Right to rectification** - if your personal data is incomplete or incorrect, you have the right to correct it.
- **Right to object to data processing** - you have the right to object to data processing if it is done on the basis of legitimate interest.
- **Right to erasure of personal data** - you have the right to request the erasure of your personal data if there are no grounds for further processing.
- **Right to data portability** - you have the right to receive your personal data in a structured, commonly used format and the right to send this data to another data controller.
- **Right to withdraw consent** - you have the right to withdraw your consent to the processing of your personal data at any time, if the processing is based on your consent

If you have questions about the legal basis for processing your personal data or wish to exercise your rights, please contact us. To exercise your rights, please contact us. You may need to confirm your identity before your request can be fulfilled. You also have the right to lodge a complaint with the data protection supervisory authority.

Changes to the Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on <https://www.eauditor.eu/cloud>.

We recommend that you review this Privacy Policy periodically to be aware of any changes. Changes to this Privacy Policy will become effective when published on this website.

Your continued use of the Service following the posting of changes to the Privacy Policy will be deemed your agreement to the updated terms of the Policy.

Contact

If you have any questions about this Privacy Policy, you may contact us:

- By sending an email to: iod@btc.com.pl
- By visiting this page on our website: <https://www.eauditor.eu/en/cloud>.

To exercise your rights, please contact us. You may need to confirm your identity before your request can be fulfilled. In addition, you have the right to lodge a complaint with the data protection supervisory authority if you consider that the processing of your personal data violates the law.

Contact

If you have any questions about this Privacy Policy, please contact us:

- By sending an email to: iod@btc.com.pl
- By visiting the website: <https://www.eauditor.eu/en/cloud>.