

PRIVACY POLICY

The use of the Administrator's website <https://fobos.tech/> requires the processing of personal data of the user visiting the website - hereafter referred to as the User in this Privacy Policy.

1. Who is the Controller of my data?

The administrator of the personal data is FOBOS SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ with its registered office in Warsaw, ul. Puławska 12/3, 02-566 Warsaw, entered in the National Register of Entrepreneurs kept by the District Court for the Capital City of Warsaw in Warsaw, XIV Economic Division of the National Register of Entrepreneurs under the KRS number 0001014805, NIP 1133083600, REGON: 52424964000000, with a share capital of 10,500, paid in full, e-mail [xx], telephone [xx].

The controller guarantees the fulfilment of all rights under 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 on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) - RODO.

2. In which cases will the Controller process my data

- o **What personal data will be processed by the Administrator?**
- o **Is it necessary for the user to provide data?**
- Visiting the website by the User - purpose: maintenance and administration of the Administrator's website;
 - o Type of data processed: IP address, server date and time, browser information, operating system information (so-called server logs);
 - o The provision of personal data is voluntary, but necessary for the correct operation and display of the website. If they are not provided, the website will not be able to function properly.
- User activity on the website - purpose: to provide content on the Administrator's website;
 - o Type of data processed: IP address, date and time of visit, browser information, information about the operating system (so-called server logs);
 - o The provision of personal data is voluntary, but necessary for the correct operation and display of the website. If they are not provided, the website will not be able to function properly.
- Sending an enquiry to the e-mail address indicated under "Contact" - purpose: to respond to an enquiry/question or to prepare a quotation/offer;
 - o Type of data processed: e-mail address, data provided in the body of the message;
 - o The provision of an e-mail address is necessary in order to receive a reply to the message sent. The provision of other personal data is voluntary.
- Registration and administration of the account to access the user's website accessible after logging in:
 - o Type of data processed: name or organisation/company name in the case of a legal entity, e-mail;
 - o The User is able to log in to the customer portal in order to [access certain services or to perform pre-contractual activities]. To access the customer portal, the User must enter his/her email address and reset his/her password.
 - o If they are not provided, the website will not be able to function properly: logging in and using the part of the website accessible only after logging in will not be possible.
- Establishing, pursuing or defending against claims;
 - o Type of data processed: IP address, date and time of visit, browser information, information about the operating system (so-called server logs);

- o The processing of personal data is necessary for the Administrator's legitimate interests, in this case to establish, assert or defend against claims that may arise in connection with the use of the website.

3. For what purpose will my data be processed? On what basis?

Your data will be processed for the following purposes and on the basis of:

- for purposes related to the conclusion and performance of contracts, if you send an email with a proposal for cooperation, an enquiry about services provided by the Administrator, fill in a form requesting access to a part of the service only after logging in - on the basis of Article 6(1)(b) RODO;
- in order to perform the contract within the framework of the services provided by the Administrator, i.e. to provide the software for VR exposure therapy, to provide equipment, to enable feedback - on the basis of consent, in order to make use of the aforementioned service - on the basis of Article 9(2)(b) RODO;
- in order to fulfil the Administrator's legal obligations regarding, inter alia, consumer law, tax law, accounting regulations - on the basis of Article 6(1)(c) RODO;
- for the purposes of the legitimate interests pursued by the Administrator: administration of the website, establishment, investigation or defence of claims - on the basis of Article 6(1)(f) RODO.

4. For how long will my data be processed?

- In the case of the processing of data on the basis of a concluded contract, the processing period lasts until the performance of the contract and its subsequent settlement - the fulfilment of contractual or public law obligations by the Controller.
- In the case of data processing for the purpose of asserting and defending against claims - the Administrator will process the data until the expiry of the limitation period for such claims.
- Where data is processed in connection with the administration of the website, the data will be processed until (i) the expiry of the limitation periods for claims that may arise in connection with the use of the website, (ii) until an effective objection has been lodged or the purpose of the processing has been achieved - whichever of the aforementioned periods expires first.

5. Will my data be transmitted? If yes, to whom?

In connection with the organisation of the Administrator's activities, your personal data may be transferred to the following categories of recipients on the basis of the relevant agreements:

- a) entities authorised by law;
- b) to service providers providing technical and organisational solutions to the Administrator the minimum extent necessary and justified for the performance of those services:
 - IT systems operation,
 - hosting,
 - entities cooperating with the Administrator, including the entity that conducts psychotherapy with the user, persons authorised by the Administrator to process data in the performance of their official duties, service providers who provide the Administrator with technical and organisational solutions enabling the Administrator to conduct its business activities and provide services, to the minimum extent necessary and justified by the performance of these services (including, for example, accounting, Internet domain provider, postal or courier service providers);
 - [xx]

6. What rights do I have?

In relation to the processing of your personal data, you have the right to:

- a) request access to the data, including receiving a copy of the data,

- b) rectification of personal data,
- c) request the transfer of personal data,
- d) deletion of personal data,
- e) restrictions on the processing of personal data,
- f) object to the processing of personal data (if the data is processed on the basis of Article 6(1)(f) RODO),
- g) request the deletion of personal data,
- h) lodge a complaint to the supervisory authority, which in Poland is the President of the Office for Personal Data Protection (ul. Stawki 2, 00-193 Warsaw; kancelaria@uodo.gov.pl), if you believe that your data is not being processed lawfully.

To exercise any of your rights, you can:

- send letter to: FOBOS SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ based in Warsaw, 12/3 Puławska St., 02-566 Warsaw
- send e-mail to: [xx].

7. What happens to my data? Can they go outside the European Union ?

The administrator **does not use automated decision-making, including profiling.**

Personal data **will not be transferred to third countries or an international organisation** (i.e. outside the European Union and to countries outside the European Economic Area).

8. cookies .

The website uses cookies. These are small text files stored on the User's device, which allow to improve the functionality of the website. Cookies are used by the Administrator for the following purposes:

- ensuring the proper functioning of the Website;
- enhancing the browsing experience on the Website;

Some of these files may be considered personal data.

The Administrator's use of cookies by collecting data through them requires the User's consent, unless the use of cookies is necessary to display the content of the website (so-called essential cookies).

The user is informed about the cookies used on the website via the **cookie banner that is displayed when opening the website.**

Consent to the use of cookies can be given and withdrawn via the browser devices you use to browse the website. Detailed information can be found on the following pages:

- Internet Explorer: <https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies>
- Mozilla Firefox: <http://support.mozilla.org/pl/kb/ciasteczka>
- Google Chrome: <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>
- Opera: <http://help.opera.com/Windows/12.10/pl/cookies.html>
- Safari: <https://support.apple.com/kb/PH5042?locale=en-GB>

The user can at any time verify the status of the current privacy settings for the browser they are using by using the following tools:

- <http://www.youronlinechoices.com/pl/twojewybory>
- <http://optout.aboutads.info/?c=2&lang=EN>

Below is a list of the cookies used within the website:

Type of files cookies	Description	Duration
Essential (functional) necessary for the functioning of the website, they cannot be switched off. They are saved in response to actions taken by the User (setting privacy preferences, filling in forms). Such cookies do not store any personal data.	E.g. <i>session</i> are cookies that expire when you log out or close your browser. They are stored temporarily and destroyed when you leave the website	E.g. 30seconds/30 minutes/6 months/1 year/session duration

9. Final provisions.

The Data Controller may amend the Privacy Policy if required by law or changes to the functionality of the website. The Data Controller will notify all its users of any changes and their effective date, in particular by posting a notice on the website.

Current version of the Privacy Policy dated [xx] 2025.