

PRIVACY POLICY

Use of the website <https://fobos.tech/> The Administrator requires the processing of personal data of the user visiting the website – hereinafter referred to as the User in this Privacy Policy.

1. Who is the Administrator of my data?

The controller of personal data is FOBOS SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ with its registered office in Warsaw, ul. Puławska 12/3, 02-566 Warsaw, entered into the National Register of Entrepreneurs maintained by the District Court for the Capital City of Warsaw in Warsaw, 14th Commercial Division of the National Register of Entrepreneurs under the KRS number 0001014805, NIP (Tax Identification Number) 1133083600, REGON (National Business Registry Number): 52424964000000, with the share capital of PLN 10,500, fully paid up, e-mail: contact@fobos.tech

The Administrator guarantees the fulfillment of all rights arising from 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) – GDPR.

2. In what cases will the Administrator process my data?

- **What personal data will be processed by the Administrator?**
 - **Is it necessary for the User to provide data?**
- Visiting the website by the User – purpose: maintaining and administering the Administrator's website;
 - Type of data processed: date and time of the visit, country of origin of the visit, type of browser, type of device from which the visit is made
 - Providing personal data is voluntary, but necessary for the proper functioning and display of the website. Failure to provide personal data may result in the website not functioning properly.
- User activity on the website – purpose: sharing content on the Administrator's website;
 - Type of data processed: information about websites visited, data on the time spent on the website, data on the path of website visits
 - Providing personal data is voluntary, but necessary for the proper functioning and display of the website. Failure to provide personal data may result in the website not functioning properly.
- Sending an inquiry to the e-mail address indicated in the "Contact" tab – purpose: response to the inquiry/message or preparation of a quote/offer;
 - Type of data processed: e-mail address, data provided in the message content;
 - Providing your email address is necessary to receive a response to your message. Providing other personal data is voluntary.
- Registration and administration of the account in order to access the user's website after logging in:
 - Type of data processed: name and surname or name of the organization/company in the case of a legal person, e-mail;
 - Users can log in to the client portal to access tools that support the exposure therapy process. To access the client portal, users must provide their email address and reset their password.
 - If you do not provide them, the website will not be able to function properly: logging in and using the parts of the website that are only available after logging in will not be possible.
- Establishing, pursuing or defending against legal claims;
 - Type of data processed: IP address, date and time of visit, information about the web browser, information about the operating system

- The processing of personal data is necessary to pursue the legitimate interest of the Controller, in this case the establishment, pursuit or defence against claims that may arise in connection with the use of the website.

3. For what purposes 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 e-mail with a proposal for cooperation, an inquiry regarding the services provided by the Controller, or fill out a form requesting access to parts of the website only after logging in – pursuant to Article 6(1)(b) of the GDPR;
- in order to perform the contract as part of the services provided by the Controller, i.e. providing software for VR exposure therapy, supplying equipment, enabling feedback – based on consent, in order to use the above-mentioned service – pursuant to Article 9 paragraph 2 letter b) of the GDPR;
- in order to fulfil the legal obligations incumbent on the Controller, including in the field of consumer law, tax law, accounting regulations – pursuant to Article 6 paragraph 1 letter c) of the GDPR;
- for purposes arising from legitimate interests pursued by the Controller: administration of the website, determination, pursuit or defence against claims – pursuant to Article 6(1)(f) of the GDPR.

4. How long will my data be processed?

- In the case of data processing on the basis of a concluded contract, the processing period lasts until the contract is performed and then settled – until the Controller fulfills its contractual or public law obligations.
- In the case of data processing for the purpose of pursuing and defending against claims, the Administrator will process the data until the expiry of the limitation period for such claims.
- In the case of data processing 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 is raised or the purpose of processing is achieved – whichever of the above-mentioned periods expires first.

5. Will my data be shared? If so, to whom?

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

- a) entities authorized by law;
- b) service providers providing the Controller with technical and organizational solutions to the minimum extent necessary and justified for the performance of these services:
 - Dobos system support
 - hosting,
 - entities cooperating with the Controller, including the entity that conducts psychotherapy with the user, persons authorized by the Controller to process data as part of their official duties, service providers providing the Controller with technical and organizational solutions that enable conducting business activities and providing services, to the minimum extent necessary and justified by the performance of these services (including, for example, accounting, internet domain provider, entities providing postal or courier services);

6. What rights do I have?

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

- a) request access to data, including receiving a copy thereof,

- 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 are processed on the basis of Article 6(1)(f) of the GDPR),
- g) request the deletion of personal data,
- h) lodging a complaint with 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 may:

- send a letter to the following address: FOBOS SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ with its registered office in Warsaw, ul. Puławska 12/3, 02-566 Warsaw
- send an e-mail to the e-mail address: contact@fobos.tech

7. What happens to my data?

Can they be shipped outside the European Union?

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

Personal data will not be transferred to third countries or international organisations (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 that allow the website to be improved. Cookies are used by the Administrator for the following purposes:

- ensuring the proper functioning of the Website;
- increasing the comfort of browsing the Website;

Some of these files may be considered personal data.

The use of cookies by the Administrator 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 necessary 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 granted and withdrawn through the browser devices used by the User to browse the website. Detailed information can be found on the following websites:

- 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 verify the status of the current privacy settings for the browser he or she is using at any time by using the following tools:

- <http://www.youronlinechoices.com/pl/twojewybory>

- <http://optout.aboutads.info/?c=2&lang=EN>

Below is a list of cookies used on the website:

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

9. Final provisions.

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

Current version of the Privacy Policy from August 18, 2025.