

“COMFORT LIFE TECH” limited liability company

Plac Bankowy str., 2, room 1309, post office code 00-095, Warsaw, Poland. National Economy Register number: 389934132, tax identification number: 7123424132. Bank details: PL16160014621807188470000001 PLN, PL86160014621807188470000002 EUR +38050 46 46 46 2; bizz0777@gmail.com

Privacy Policy

COMFORT LIFE TECH Sp. z o.o.

Company Registry (KRS): 0000921491

Tax ID (NIP): 7123424132

REGON: 389934132

Registered Address: Plac Bankowy 2/1309, 00-095 Warsaw, Poland

Email: Insert Relevant Support/Privacy Contact

Privacy Policy

Effective Date: April, 01, 2025

1. Introduction and Scope

1.1. **Welcome to Comfort Life Tech** (the “Company,” “we,” “us,” or “our”). We highly value your privacy and endeavor to protect your personal data according to the highest legal standards.

1.2. This Privacy Policy explains how we collect, process, use, store, and share your information when you access or use our website and associated services (collectively, the “Services”). It also outlines your rights under the EU General Data Protection Regulation (“GDPR”), relevant Polish data protection laws, and other applicable regulations.

1.3. By visiting our website or otherwise using our Services, you acknowledge that you have read, understood, and agree to the practices described in this Policy. If you do not agree with any part of this Policy, please discontinue use of our Services.

2. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person (the “data subject”).
- **Processing:** Any operation performed on personal data, such as collection, recording, storage, adaptation, retrieval, consultation, use, disclosure, erasure, or destruction.
- **GDPR:** Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons regarding the processing of personal data and on the free movement of such data.
- **Cookies:** Small text files stored on your device when you browse websites. They allow recognition of your device and the storing of certain information about your preferences or past actions.

3. Information We Collect

3.1. Personal Data You Provide Voluntarily

We may collect and process personal data that you directly provide to us, such as:

- **Contact Data:** Name, email address, phone number, or postal address.
- **Identification Data:** For compliance (e.g., AML/KYC), we may request documents like your ID card, passport, proof of address, or corporate registration (if you are acting on behalf of a legal entity).
- **Account Data:** Username, password, and any profile information you provide when creating an account on our Platform.
- **Communication Data:** Information you provide when contacting us via email, support tickets, or other channels.

3.2. Data Collected Automatically

When you use our website, we may automatically collect certain information about your device and usage via Cookies or similar technologies, for instance:

- **IP Address** and browser type.
- **Device Information:** Operating system, device model.

- **Usage Data:** Pages viewed, time spent on pages, referral URLs, and navigation paths.

3.3. Third-Party Sources

Where legally permitted, we may also receive information from third parties (such as identity verification providers, KYC/AML databases, or public registries like KRS or CEIDG) to help us comply with regulatory obligations and maintain the quality of our Services.

4. Legal Basis and Purposes of Processing

4.1. Legal Basis

We only process personal data where permitted by law. Our primary legal bases under GDPR may include:

- **Your Consent** (Art. 6(1)(a) GDPR): Where you explicitly consent to processing for a specific purpose (e.g., marketing newsletter).
- **Performance of a Contract** (Art. 6(1)(b) GDPR): Where processing is necessary to fulfill our contract with you or to take steps at your request before entering into a contract.
- **Legal Obligation** (Art. 6(1)(c) GDPR): For example, obligations under anti-money laundering (AML) or financial regulations in Poland or the EU.
- **Legitimate Interests** (Art. 6(1)(f) GDPR): For instance, to ensure the security of our website, to detect fraud, or to improve our Services, provided such interests are not overridden by your fundamental rights.

4.2. Purposes of Processing

We may process your personal data for:

- **Providing Services:** Creating and managing your account, executing transactions, facilitating customer support.
- **Regulatory Compliance:** KYC/AML checks, sanctions screening, and other legal requirements.
- **Service Improvement:** Enhancing the user experience, troubleshooting, and data analytics.
- **Marketing Communications:** Sending newsletters or promotional materials (only with your prior consent or as otherwise permitted by law).
- **Security and Fraud Prevention:** Monitoring, detecting, and preventing fraud or unauthorized activities.

5. Data Sharing and Transfers

5.1. Within Comfort Life Tech

We may share your personal data within the Company's internal teams solely for the purposes described in this Policy.

5.2. With Service Providers

We may engage trusted third-party service providers for business operations (e.g., cloud hosting, analytics, identity verification). These providers process personal data on our behalf and must comply with strict confidentiality and security obligations.

5.3. Regulatory or Legal Disclosures

We may disclose personal data to government authorities, law enforcement, or regulators (such as the General Inspector of Financial Information – GIIF) when required by law, legal process, or to comply with AML obligations.

5.4. Corporate Transactions

In the event of a merger, acquisition, reorganization, or sale of assets, personal data may be transferred as part of that transaction, subject to confidentiality obligations.

5.5. International Data Transfers

If personal data is transferred outside the European Economic Area (EEA), we ensure adequate safeguards (e.g., Standard Contractual Clauses) as required by GDPR.

6. Retention of Personal Data

6.1. Retention Period

We retain personal data for as long as necessary to fulfill the purposes for which it was collected, and to comply with legal, accounting, or reporting obligations. For example, AML/KYC-related documents are typically retained for five (5) years after the end of a customer relationship, in accordance with Polish AML laws.

6.2. Deletion or Anonymization

Once no longer needed, personal data will be securely deleted or anonymized, unless otherwise required by law.

7. Cookies & Similar Technologies

7.1. Use of Cookies

We use Cookies and similar tracking technologies on our website to:

- Maintain user sessions and remember your preferences;
- Analyze website traffic and usage patterns;
- Ensure security and integrity of our Services.

7.2. Cookie Control

You can set your browser to refuse Cookies or to alert you when Cookies are being sent. However, disabling Cookies may limit some functionalities of our Services.

7.3. Third-Party Cookies

We may use third-party analytics or advertising services that set their own Cookies. These third parties have their own privacy policies, and we encourage you to review them.

8. Your Rights under GDPR

Subject to applicable law, you have the following rights regarding your personal data:

- **Right of Access:** You can request confirmation as to whether your personal data is being processed and obtain a copy of the data.
- **Right to Rectification:** You can request correction of inaccurate or incomplete personal data.
- **Right to Erasure** (“Right to be Forgotten”): You can request deletion of personal data under certain circumstances (e.g., if no longer needed, or if processing was unlawful).
- **Right to Restriction of Processing:** You can request limitation of processing where the accuracy or lawfulness of the data is contested, or you need the data to establish or defend legal claims.
- **Right to Data Portability:** In certain cases, you can request to receive your personal data in a structured, commonly used, machine-readable format, and request the transfer of such data to another controller.
- **Right to Object:** You may object at any time to processing based on our legitimate interests, or for direct marketing purposes.
- **Right to Withdraw Consent:** Where processing is based on your consent, you may withdraw it at any time (withdrawal does not affect the lawfulness of processing prior to withdrawal).

To exercise your rights, please contact us at the details provided in Section 10.

9. Data Security

9.1. Security Measures

We employ appropriate technical and organizational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access.

9.2. No Absolute Guarantee

While we strive to safeguard your personal data, no method of transmission over the Internet or electronic storage is 100% secure. We cannot guarantee absolute security.

10. Contact Us

For questions, requests, or concerns regarding this Privacy Policy or our data processing practices, please contact:

Comfort Life Tech Sp. z o.o.

Plac Bankowy 2/1309, 00-095 Warsaw, Poland

Email: Insert Privacy/Support Contact

You also have the right to lodge a complaint with the **President of the Personal Data Protection Office (PUODO)** in Poland or another competent data protection authority in the EU if you believe we have infringed your rights under GDPR.

11. Policy Updates

11.1. Revisions

We may occasionally update this Privacy Policy to reflect changes in legal requirements or our business practices. When we make significant changes, we will notify you via our website or by other appropriate means before the changes become effective.

11.2. Your Continued Use

Your continued use of our Services after any modification to this Privacy Policy will constitute your acceptance of such changes.