

**Privacy and Cookie Policy**  
for [www.knowla.eu](http://www.knowla.eu)  
**KNOOCKER SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ**  
with its registered office in Poznan at Głogowska 216

**Contact with the Data controller on matters relating to Personal Data protection:** Knoocker sp. z o.o., ul. Głogowska 216, 60-104 Poznań; e-mail: [hello@knowla.eu](mailto:hello@knowla.eu).

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**1. DEFINITIONS:**

- B. Data controller** - Knoocker sp. z o.o. with its registered office in Poznan (60-104), ul. Głogowska 216, 60-104 Poznań, Tax Identification Number: 7252080456, National Business Registry Number: 36033303300000, registered in the National Court Register kept by the

District Court for Łódź-Śródmieście in Lodz, XX Division of the National Court Register, under number: 0000532609, e-mail: hello@knowla.eu.

- C. **Personal Data (Data)** - information about a natural person identified or identifiable by one or more factors specific to physical, physiological, genetic, mental, economic, cultural or social identity, including device IP, Location Data, Internet ID and information collected through cookies and other similar technology.
- D. **Policy** - this Privacy and Cookies Policy.
- E. **GDPR** - 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.
- F. **Website** - the website operated by the Data controller at [www.knowla.eu](http://www.knowla.eu).
- G. **User** - any natural person visiting the Website or using one or more of the services or functionalities described in the Policy (also referred to directly as you, your, yours).
- H. **Privacy Policy Page** - <https://knowla.eu/en/privacy-policy-page/>

## 2. How do we collect your Data when you use our Website?

In connection with your use of our Website, we collect Data necessary to provide the various services offered by the Website, as well as information about your activity on the Website. Some **Data are collected automatically**, when you visit the Website, through cookies or similar technologies placed on the Website. Other Data is collected when you enter it into contact or registration forms on the Website.

You can actively manage cookies or similar technologies placed on our Website: [link](#).

We have described your rights and the specific terms and purposes of the processing of Personal Data collected by us when you use the Website below.

## 3. Information on your rights in relation to the processing of Personal Data

In relation to our processing of your Personal Data, you have:

- A. the right to access the content of the Data;
- B. the right to request rectification;
- C. the right to the erasure of the Data (“the right to be forgotten”);
- D. the right to restrict processing;
- E. the right to data portability;
- F. **the right to object to Data processing for marketing purposes** - you may object to the processing of Personal Data for marketing purposes at any time, without having to justify such objection;
- G. **the right to object to other purposes of processing** - you may object - for reasons related to your particular situation - to processing of Personal Data that is carried out based on our legitimate interests (e.g. for analytical or statistical purposes) at any time - an objection in this respect should contain a justification;
- H. the right not to be subject to a decision (including profiling) that is based solely on automated processing and produces legal effects on you or similarly significantly affects you;
- I. **the right to withdraw consent** (where processing is based on consent) - at any time without affecting the lawfulness of the processing carried out based on consent before its withdrawal;

J. the right to submit a complaint with the supervisory authority dealing with the protection of Personal Data.

You can exercise your rights by sending an appropriate request to the following address: Knoocker sp. z o.o., ul. Głogowska 216, 60-104 Poznań or by e-mail: hello@knowla.eu.

The request should, as far as possible, indicate precisely what the request is about. If we cannot determine the content of your request or identify you, we will ask you for additional information. It is not mandatory to provide additional information, but failure to do so will result in the request being refused.

We will respond to requests no later than one month after receipt. If it is necessary to extend this deadline, we will inform you of the reasons for the extension.

We will respond to you at the e-mail address from which the request was sent and, in the case of requests made by letter or otherwise, by ordinary mail to the address you have indicated, unless it is clear from the content of the letter that you wish to be contacted by e-mail (in which case an e-mail address must be provided). Where the timing of the request makes it impossible to respond in writing, and the extent of your Data processed by us allows us to contact you electronically, we will respond by email.

We store information relating to the request made and the person who made the request, to ensure that compliance can be demonstrated and to establish, defend or pursue potential claims by Data Subjects. The log of requests is stored in a manner that ensures the integrity and confidentiality of the contained Data. The legal basis for the processing of the Data is our legitimate interest in maintaining accountability for the handling of referred requests and the establishment and defence of claims. You have the right to object.

#### **4. Data Recipients**

In connection with the collection of Data necessary for the provision of the various services offered by the Website, as well as information about your activity on the Website, your Personal Data will be disclosed to external entities, including in particular suppliers responsible for the operation of IT systems.

Data may be disclosed to the competent authorities or third parties who request such information on the appropriate legal basis and under the provisions of the applicable law.

If you have given your consent, your Data may also be shared with other entities for their purposes, including marketing activities.

#### **5. Period of Data processing**

The duration of Data processing by the Data controller depends on the type of service provided and the purpose of the processing. As a rule, Data are processed for the duration of the service provision or order fulfilment, until the withdrawal of the consent given or until an effective objection is made to Data processing in cases where the legal basis for Data processing is the legitimate interest of the Administrator.

The Data processing period may be extended if the processing is necessary for the establishment and assertion of possible claims or the defence against claims, and thereafter only if and to the extent required by law. After the end of the processing period, the Data shall be irreversibly deleted or anonymised.

## 6. Data processing in connection with the use of the Website

1. In connection with your use of our Website, we collect Data to the extent necessary to provide the individual services offered and information about your activity on the Website.
2. Your activity on the Website, including Personal Data, is recorded in system logs and processed primarily for purposes related to the provision of services on the Website. We also process this Data for technical and administrative purposes, to ensure the security and the management of IT systems, as well as for analytical and statistical purposes - in this regard, the legal basis for processing is our legitimate interest. You are entitled to the right to object.
3. We also process your Personal Data (including IP address or other identifiers and information collected through cookies or other similar technologies):
  - to provide electronic services in respect of the content made available to you collected on the Website - legal basis: the necessity of the processing for the performance of the agreement;
  - for analytical and statistical purposes - legal basis: our legitimate interest in carrying out analyses of Users' activities as well as their preferences in order to improve the functionalities used and the services provided. You have the right to object to such processing;
  - to establish, investigate or defend against claims - based on our legitimate interest. You have the right to object;
  - for our marketing purposes, in particular, in connection with the presentation of behavioural advertising - the principles of Data processing for marketing purposes are described below under "Data processing for marketing purposes".

### A. Contact form

1. When filling in the contact form, you will be asked to provide your Data. **The scope of the Data collected includes** the name, telephone number, e-mail address, date and time of contact, and content of the message. Completion of the aforementioned Data is a condition for sending the message. Provision of Data marked as obligatory is required to receive and handle the message - their failure to do so will result in the impossibility of replying to the enquiry.
2. Personal Data is processed:
  - a) to identify the sender of the message and respond to the enquiry made to us - we will process your Data to perform the service of providing the contact form;
  - b) if your contact is to enter into an agreement - we will process your Data to take measures to enter into an agreement or to enter into an agreement - based on your interest in our services and the actions you have taken to enter into an agreement;
  - c) to establish, investigate or defend against claims - based on our legitimate interest. You have the right to object;
  - d) for analytical and statistical purposes - based on our legitimate interest to analyse your activity and preferences when using the Website and to improve the functionalities used. You have the right to object.

3. Please be advised that we transfer your Data outside the European Economic Area - more [here](#).
4. Your Data will be processed for the time necessary to fulfil the indicated purposes of the processing, including the time necessary to provide the service or to make an effective objection to the Data processing in cases where the legal basis for the Data processing is our legitimate interest of the Data controller, in particular:
  - a) Data obtained to identify the sender and respond - for the period necessary to respond/clarify the matter, and in the case of Data voluntarily provided based on consent, until you withdraw your consent to Data processing or we determine that the Data has become outdated;
  - b) Data obtained to conclude an agreement - for the period of negotiation of the agreement and until the end of the calendar year following the year in which you last contacted us.
5. Your Personal Data provided in the contact form will not be subject to a decision (including profiling) that is based solely on automated processing and produces legal effects on you or similarly materially affects you.
6. The provision of Data is voluntary to the extent that Data processing takes place to establish contact. The consequence of not providing the Data will be that it will not be possible to make contact/respond.

## **B. Traditional and e-mail correspondence and telephone contact**

1. If you send us correspondence by email or post unrelated to the services provided to you or any other agreement you have entered into with us, we will only process the Personal Data contained in that correspondence for communication and resolution of the matter to which it relates.
2. When you contact us by telephone on matters not related to the agreement or the services provided, we may only require you to provide Personal Data if it is necessary to handle the matter to which the contact relates.
3. The legal basis for the processing is our legitimate interest in dealing with correspondence addressed to us concerning our business activities and, in the case of telephone contact, our legitimate interest in having to resolve a reported matter relating to our business activities. You have the right to object.
4. We only process Personal Data relevant to the case.
5. Please be advised that we transfer your Data outside the European Economic Area.
6. Your Data will be processed for the time necessary to fulfil the stated purposes of the processing, or until you raise an effective objection to the Data processing in cases where the legal basis for the Data processing is our legitimate interest.

## **C. Newsletter subscription and your Data**

1. When subscribing to the newsletter, you will be asked to provide your e-mail address and accept the Newsletter's Terms and Conditions. The condition for subscribing to the Newsletter is the provision of an e-mail address and acceptance of the Newsletter's Terms and Conditions. Subscribing to the Newsletter is voluntary.
2. We will process the Data you provide to send you the Newsletter you have subscribed to - to your email address - based on your consent to send the Newsletter (following the Newsletter's Terms and Conditions).

3. Please be advised that we transfer your Data outside the European Economic Area - more here or in the Newsletter's Terms and Conditions.
4. Your Data will be processed for the period necessary to fulfil the processing purposes indicated above, i.e. for the duration of your subscription to the Newsletter - but at the latest, until you unsubscribe from the Newsletter or the Newsletter is discontinued.
5. Your Personal Data provided in the contact form will not be subject to a decision (including profiling) that is based solely on automated processing and produces legal effects on you or similarly materially affects you.

#### **D. Your Data and our social media accounts**

Note - the information below does not apply to Data processing by the data controllers of Facebook, Instagram, LinkedIn, and Youtube - information on Data processing by the data controllers of these websites can be found on their websites.

1. We maintain public profiles on Facebook, Instagram, LinkedIn, and Youtube. Accordingly, we process Data of persons visiting our profiles, posting comments, likes, and taking other activities within these profiles.
2. We process the Data acquired exclusively in connection with the operation of the profile, including for the purpose of:
  - a) enabling activity on these profiles;
  - b) actively and efficiently managing the profiles, including information on our activities and the promotion of various events, services and products, as well as for communication via the functionalities available on the profiles;
  - c) statistics and analytics;
  - d) establishing, investigating or defending against claims.
3. The legal basis for Data processing is our legitimate interest to promote our brand and build and maintain a brand-related community and, in the case of establishing, asserting or defending against claims, to assert and defend against claims. You have the right to object.

#### **E. Data processing for marketing purposes**

1. We also process your Data to carry out marketing activities, which may consist of:

A. displaying marketing content that matches your interests (**behavioural advertising**).

We process your Data, including Personal Data collected through cookies and other similar technologies, for marketing purposes in connection with targeting you with behavioural advertising. The processing of Personal Data then includes the profiling of Data. The use of the Personal Data collected through this technology for marketing purposes, in particular, to promote the services and goods of third parties, requires your consent. This consent may be withdrawn by you at any time, without affecting the lawfulness of the processing carried out based on your consent before its withdrawal. The expression and withdrawal of consent are carried out using the [cookie management panel](#) that you can access from the **Privacy Policy Page**.

B. displaying marketing content that is not tailored to your interests (**contextual advertising**).

Data processing is then carried out in connection with the exercise of our legitimate interest in promoting our services or products. You have the right to object.

1. e-mail notifications of interesting offers or content, which in some cases contain commercial information (newsletter service);

2. directing marketing content through various channels, i.e. by email, MMS/SMS or telephone - whereby we only undertake such activities if you have given your consent, which you may withdraw at any time without affecting the lawfulness of the processing carried out based on your consent before its withdrawal (so-called **direct marketing**). We may also carry out direct marketing by post, which we will inform you of - you have a right to object;
3. carrying out other analytical and statistical activities;
4. carrying out other activities related to direct marketing of our services or products (sending commercial information by electronic means);
5. In order to carry out marketing activities, in some cases, we use profiling. This means that, through automated Data processing, we assess selected factors about Users to analyse their behaviour or make predictions for the future. This allows us to better tailor the content displayed to the User's preferences and interests.

## 7. Cookies and similar technologies

Cookies are text files installed on the device you use to browse the Website (e.g. computer, smartphone, an electronic device with internet access - so-called telecommunication end device). Cookies can be useful as they allow websites to recognise your device, and your preferences and generally help improve your online experience. You can find more information about cookies on the following pages: [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.eu](http://www.youronlinechoices.eu).

We mainly use cookies to provide you with electronic services and to improve the quality of these services. We use both our own and external cookies. Own cookies are set by our Website. External cookies, so-called third-party cookies, are set by a domain other than our Website.

As required by law, we may store cookies on your device if necessary for the operation of the Website (so-called Essential Cookies). We need your consent for all other types of cookies. Some cookies are placed by third-party services that appear on our Website. You can withdraw your consent at any time (without affecting the lawfulness of the processing carried out based on your consent before its withdrawal) by changing the selected settings. The expression and withdrawal of consent are done using the cookie management panel that you can access from the **Privacy Policy Page**.

### A. Our Website uses cookies and other similar technologies

Accordingly, we and others who provide services for us, including analytics, statistics or marketing, use cookies to store information or access information already stored on the telecommunications end device you use to browse the Website. The use of cookies on the Website is not intended to identify you.

**We use four types of cookies** - Essential cookies, Preference cookies, Statistical cookies, and Marketing cookies. The use of third-party vendor cookies involves the transfer of Data collected by these cookies outside the EEA.

**Note! You can find detailed information about the cookies used on the Website, their type, name, provider** (through which you can reach its Privacy Policy), **the purpose of processing, and expiry date in our cookie management panel**. The panel allows you to manage your preferences regarding the cookies we use. The panel is displayed when you first access the Website and periodically every six months. The panel remembers the choices you make. The panel can be called up again automatically through the **Privacy Policy Page** to verify the preferences you have set or to change them (revoke your consent).

- **ESSENTIAL COOKIES:**

We use Essential cookies to provide you with the services and functionalities of the Website that you wish to use. They ensure the proper functioning of the Website and the use of the available services and functionalities. Without these cookies, the Website cannot function properly. Essential cookies are always active on our Website. The legal basis for Data processing in connection with the use of Essential Cookies is that the processing is necessary for the performance of the agreement.

- **PREFERENCE COOKIES:**

These cookies allow us to 'remember' and adjust the chosen settings and to personalise your user interface, e.g. the language or region, the font size, the design of the website, etc. Our partners and we may install functional cookies through the Website. The legal basis for Data processing is your consent granted through the cookie management panel. This consent can be withdrawn at any time (without affecting the lawfulness of the processing carried out based on consent before its withdrawal) in the same panel, which you can access via the following on the **Privacy Policy Page**.

- **STATISTICAL COOKIES:**

Statistical cookies help us understand how different Users behave on the Website by collecting and reporting anonymous information. Statistical cookies allow us to obtain information such as the number of visits and traffic sources on the Website. They are used to determine which functionalities of the Website are more and which are less popular and to understand how Users navigate the Website by keeping statistics on Website traffic. Data processing is done to improve the performance of the Website. The information collected by these cookies is aggregated and is therefore not intended to establish your identity. Our partners and we may install statistical cookies through the Website. The legal basis for Data processing is your consent granted through the cookie management panel. This consent can be withdrawn at any time (without affecting the lawfulness of the processing carried out based on consent before its withdrawal) in the same panel, which you can access via the **Privacy Policy Page**

- **MARKETING COOKIES:**

Their aim is to display personalised advertising that is relevant and interesting to you (behavioural advertising) - both on and off the Website. Your interest profile is built based on the information from these cookies and your activity on other Websites. Our partners and we may install marketing cookies through our Website. The legal basis for Data processing is your consent granted through the cookie management panel. This consent can be withdrawn at any time (without affecting the lawfulness of the processing carried out based on consent before its withdrawal) in the same panel, which you can access via the **Privacy Policy Page**.

Thus, we want your contact with us to correspond to your needs and interests. If you do not accept this tracking, you will still see our advertisements displayed randomly on other platforms (contextual advertising).

## **B. Our Website contains links to third-party websites, plug-ins and applications**

Clicking on these links or activating these links may allow third parties to collect or share Data about you.



At the same time, if you have consented to Preferential, Statistical or Marketing cookies, third-party websites may track your behaviour when you browse and leave the Website.

You can manage your preferences in this regard via the cookie panel you can enter on the **Privacy Policy Page**.

We do not control third-party websites and are not responsible for their privacy statements.

On our Website you will find links and plug-ins to the following third-party websites:

- Social media account on Facebook and Instagram - provider Facebook Ireland Ltd:  
[https://www.facebook.com/legal/FB\\_Work\\_Privacy](https://www.facebook.com/legal/FB_Work_Privacy) and  
[https://help.instagram.com/519522125107875?helpref=page\\_content](https://help.instagram.com/519522125107875?helpref=page_content);
- Social media account on LinkedIn – provider LinkedIn Ireland Unlimited:  
<https://www.linkedin.com/legal/privacy-policy>;
- Social media channel on Youtube – provider Google Ltd.:  
<https://policies.google.com/privacy?hl=pl>.

## 8. Transferring Data outside the European Economic Area

Due to the cookies or similar technologies used on the Website and due to the technical solutions used in Data processing, including the cloud, email, CRMs, solutions supporting the forms on the Website and its other functionalities, your Personal Data processed by us may be transferred to a third country, i.e. a country that is not part of the European Economic Area (EEA).

We inform you of our intention to transfer your Personal Data outside the EEA at the time of collection at all times. The level of protection of Personal Data outside the European Economic Area (EEA) differs from that provided by European law. For this reason, we transfer Personal Data outside the EEA only when necessary and with an adequate level of protection.

In addition, we would like to inform you that in connection with the use of the above-mentioned tools, your Data **may be transferred to the United States of America**. Currently, the USA is not subject to a decision of the European Commission declaring an adequate level of protection for Personal Data - according to the European legal standard. Due to the lack of adequate safeguards - there is a risk of inadequate protection of your Personal Data collected by the above-mentioned tools, including the risk that the transferred Data may be accessed by US public authorities. Such a situation **may result in a limitation of your Personal Data protection rights** under EU law.

For each transfer, we take care to ensure an adequate level of protection of Personal Data (safeguards) based on the legal mechanisms indicated in the GDPR, in particular, we ensure that the transfer made is based based on:

- the Decision of the European Commission stating an adequate level of protection (for countries for which such a decision has been issued);
- binding corporate rules approved by the competent supervisory authority;
- standard contractual clauses approved by the European Commission.

The entities whose services we use with an indication of the standard contractual clauses are listed below:

- provider of the package of applications for Google Workspace, Google Analytics and Google Tag Manager, i.e. Google LLC with its registered office at 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;  
Clause: <https://privacy.google.com/businesses/processor/terms/mccs/>
- provider of a package of applications for businesses such as Facebook's Pixel, i.e. Facebook Ireland Ltd 1601 S. California Ave, Palo Alto, CA 94304, USA;  
Clause: [https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum)
- provider of the Zapier package of business applications, i.e. Zapier Inc. 548 Market St. #62411, San Francisco, CA, USA;  
Clause: <https://cdn.zapier.com/storage/files/46ac3128100f09a5eeda6ceb7bdb61aa.pdf>
- provider of the Asana package of corporate applications, i.e. Asana, Inc., 1550 Bryant St #200, San Francisco, California 94103, USA,  
Clause: <https://asana.com/pl/terms#privacy-policy>

The data may also be transferred even though we do not have legal mechanisms to secure the processing of Personal Data outside the EEA.

Detailed information regarding the transfer of Personal Data outside the European Economic Area, including security copies, can be obtained by contacting us.

## 9. Safety of Personal Data processed

1. Our Website uses SSL and TLS encryption.
2. We take reasonable care to ensure that the Data is processed in a lawful, fair, transparent and secure manner for you.
3. We collect Personal Data for clearly defined purposes and do not process Data in a manner incompatible with those purposes - we also collect Data to the minimum extent necessary to fulfil the intended purposes.
4. We only process Personal Data according to the basis set out in the law, ensure that it is up-to-date and correct, and limit the duration of its storage only to the period necessary for the purposes for which it is collected.
5. We use technical and organisational measures to protect Personal Data against unlawful or unauthorised access or use, accidental destruction, loss or impairment of its integrity.
6. We ensure that only authorised persons have access to the Data and only to the extent that this is necessary for their tasks. We ensure that all operations on Personal Data are recorded and carried out only by authorised employees and associates.
7. We take all necessary measures to ensure that our subcontractors and other cooperating entities guarantee the application of appropriate security measures whenever they process Personal Data on our behalf.
8. We conduct an ongoing risk analysis and monitor the adequacy of the Data security measures in place to address identified risks. If necessary, we implement additional measures to enhance Data security.

## 10. Amendments to the Privacy and Cookie Policy

The Policy is kept under review and updated as necessary. The current version of the Policy was adopted and has been in force since February 14, 2023.