COMPANYNOW.AI PRIVACY POLICY

Version 1.2 · Effective date: 16 November 2026

Controller: COMPANY NOW PROSTA SPÓŁKA AKCYJNA
KRS: 0001278243 · NIP: 5253115084 · REGON: 546180396
Address: ul. Chmielna 2 lok. 31, 00-020 Warszawa, Poland · personal data matters: support@companynow.ai

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In brief. The controller of your data is COMPANY NOW PSA, with its registered office in Warsaw. We process the data of people who buy from us, use our panels and write to us, the data of entrepreneurs doing business as natural persons whose businesses are in our database of company profiles, and the data of people who appear in the materials of surveyed companies and in the responses of AI systems. We do not use advertising cookies. With your consent, we use Google Analytics for website visit statistics (Section 9(2)). Under their terms, the providers of the AI systems we use do not train models on content submitted via application programming interfaces. Some providers operate in the USA; the safeguards are described in Section 7. You may request access to your data, its rectification or erasure, or object to processing, by writing to support@companynow.ai.

1. Who processes your data

1. The controller of personal data is COMPANY NOW PROSTA SPÓŁKA AKCYJNA, with its registered office in Warsaw, ul. Chmielna 2 lok. 31, 00-020 Warszawa, entered in the register of entrepreneurs of the National Court Register under KRS number 0001278243, NIP 5253115084, REGON 546180396 ("CompanyNow", "we").
2. In all matters concerning personal data, please write to **support@companynow.ai** or to our registered office address marked "Personal data". We also handle requests sent to any of our other addresses; the response period runs from the date we receive them.
3. We have not designated a data protection officer, because the law does not require us to do so. Personal data matters are handled by a person designated by the management board.
4. The words "Client", "Partner", "Report", "Results" and "Input Data" mean, respectively: a company that orders our services; a company that orders them for its own clients under a partnership agreement; a report on a survey of a company's visibility in AI systems; the Report and other materials we prepare for the Client, including the archive of AI system responses; and the information and materials the Client provides to us for the survey. Other capitalized terms are explained in the CompanyNow.ai Terms of Service (the "Terms of Service").

5. We plan to transfer the CompanyNow business to Company Now prosta spółka akcyjna, which is awaiting entry in the register of entrepreneurs. Part of the business may also be transferred to other companies of the AIQ.Group. After the transfer, the acquiring company will become the controller of the data related to the transferred business. The data will be transferred on the basis of our legitimate interest in the continuity of contracts and services (Article 6(1)(f) GDPR). We will inform account holders and Clients of the transfer, the new controller and its contact details by e-mail or by a notice in the panel at least 14 days in advance, and we will publish a new version of this policy on the website. The scope of the data, the purposes of processing and your rights will not change as a result.

2. What this policy covers

1. This policy describes how we process personal data in connection with:
   a) the companynow.ai website in all language versions, including forms and payments;
   b) the client panel and the partner panel at app.companynow.ai;
   c) the provision of services, in particular surveys and Reports, advisory services and the Academy;
   d) the maintenance of the database of company profiles (Section 4a) and of rankings and industry summaries;
   e) e-mail correspondence, online meetings and our profile on LinkedIn (Section 6a).
2. Our services are intended exclusively for businesses and other professional entities (B2B). Nevertheless, we process personal data, in particular of persons who represent Clients, use accounts in the panel or contact us, and of entrepreneurs who are natural persons (e.g., sole proprietors).
3. This policy fulfills the information obligation under Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council (the "GDPR").
4. Where a Client entrusts us with personal data of which it is itself the controller, we act as a processor (Section 13). In that case, this policy does not replace the Client's information obligations toward the data subjects.

3. What data we process and where we obtain it

Whose data	What data	Where we obtain it
persons placing orders and representing the Client, including entrepreneurs who are natural persons	name, business name, position, e-mail address, telephone number, billing address, NIP or VAT number, order and payment data (without full card details)	from you: in the payment form, the order form, the panel or correspondence

Whose data	What data	Where we obtain it
users of accounts in the client panel and the partner panel (account owners, team members, guests)	name, e-mail address, role and permissions, organization, interface language, login data (password stored in hashed form only, two-step verification settings), sessions with IP address and browser information, account event log (e.g., logins, role changes, file downloads) with IP address	from you or from the person who granted you access to the account
persons submitting a form or writing to us (contact, call, pro forma invoice, Partner Program)	name, business name, position, e-mail address, telephone number, company domain, content of the message, consents given	from you
participants in the Academy and online meetings	name, e-mail address, business name, attendance data and, with consent, also image and voice in a recording	from you or from the Client that registered the participant
persons named in the materials of surveyed companies and in the responses of AI systems (e.g., management board members, employees, sole proprietors)	name, function, business contact details and other information that appears in public sources or in the responses of AI systems (Section 3a)	from public sources: companies' websites, Google company profiles (Business Profiles), search results, public registers (CEIDG, KRS and foreign registers) and the responses of AI systems, as well as from Input Data provided by the Client
entrepreneurs who are natural persons whose businesses are in the database of company profiles	name contained in the business name, NIP, business address and telephone number, domain, industry and offering of the business, the business's visibility results in AI systems (Section 4a)	from public registers (e.g., CEIDG), from companies' websites, from Google company profiles, from the responses of AI systems and, where the entrepreneur is our Client, also from the entrepreneur

Whose data	What data	Where we obtain it
website visitors	technical data: IP address, browser and device type, address of the page visited, time of the request, data in server logs	from your device, automatically (Section 9)
recipients of commercial communications	e-mail address, name, business name, content and date of consent, information on unsubscribing	from you

3a. Persons named in the materials of surveyed companies

1. When we survey a company, including a competitor indicated by the Client, we record in full the responses of AI systems, search engine results, data from the company's Google profile (e.g., telephone number) and excerpts from the company's web pages on which the responses are based. These may contain the names, functions and business contact details of persons associated with the company, e.g., management board members, employees or a sole proprietor.
2. We do not deliberately search for information about individuals, compile it or create profiles of individuals. A Report describes a company.
3. In the Results, we give the names only of persons holding a function in the Client or in the surveyed company, and only in connection with that function. We replace the data of other persons in quoted responses with a generic designation.
4. The responses of AI systems may incidentally contain information about health or other special categories of data (Article 9 GDPR) or information about charges and convictions concerning specific individuals (Article 10 GDPR). We do not search for such information, do not use it to assess a company and do not describe it in the Report. In the Results and in the response archive, we replace it with a generic designation, stating only the type of statement and its source.
5. We do not inform each of these persons individually. We usually do not know their contact details, and their data appear in the materials incidentally. In the case of competitors, informing them individually would disclose the confidential survey commissioned by the Client (Article 14(5)(b) GDPR). We therefore make this information publicly available in this policy.
6. These data are received by the Client that ordered the survey (Section 6(3)(f)). The retention period is set out in Section 5, and the manner of exercising your rights in Section 11(2) and (3).

4. Purposes and legal bases

Purpose	Legal basis	Our legitimate interest (where Article 6(1)(f) GDPR applies)
conclusion and performance of the contract for services, including acceptance of payment, performance of the survey, delivery of the Report and handling of complaints	Article 6(1)(b) GDPR where the party to the contract is a natural person (e.g., a sole proprietor); Article 6(1)(f) GDPR with respect to persons representing the Client or designated by the Client as contacts	performance of the contract with the Client
maintenance of an account in the client panel or the partner panel	Article 6(1)(b) GDPR where the account is held by a Client who is a natural person (account agreement, §9 of the Terms of Service); with respect to other users, including employees, team members and guests of the Client: Article 6(1)(f) GDPR	making the Results available to the Client and handling its orders by the persons it has designated
issuing invoices, keeping accounts and tax settlements	Article 6(1)(c) GDPR in conjunction with the regulations on value added tax, the Tax Ordinance (Ordynacja podatkowa) and the Accounting Act (ustawa o rachunkowości)	—
responding to inquiries, preparing an offer, a pro forma invoice and a contract	Article 6(1)(b) GDPR (steps taken at your request prior to entering into a contract) or Article 6(1)(f) GDPR	contact with the company you represent
conducting surveys of companies' visibility in AI systems and competitor comparisons, including processing the data of persons named in the materials of surveyed companies and in the responses of AI systems (Section 3a)	Article 6(1)(f) GDPR	our interest and the Client's interest in reliably surveying and describing what AI systems say about companies

Purpose	Legal basis	Our legitimate interest (where Article 6(1)(f) GDPR applies)
maintaining the database of company profiles, making it available in our products and to partners, API recipients and AI systems, and matching companies to the needs of recipients (e.g., requests for proposals and orders) on the basis of their offering and track record (Section 4a)	data of companies and other legal persons are not personal data; data of entrepreneurs who are natural persons: Article 6(1)(f) GDPR	maintaining a reliable database of information on business activity and providing services on its basis
development of services and survey methodology, rankings and industry summaries	company data that are not personal data are not subject to the GDPR; personal data to the extent necessary: Article 6(1)(f) GDPR	developing services and informing about companies' visibility in AI systems; we prepare rankings naming companies solely on the basis of surveys conducted on our own initiative and do not disclose in them who our Clients are
sending commercial communications by electronic means (e-mail, text message, telephone, instant messaging, including messages on LinkedIn)	only with your prior consent (Article 398 of the Electronic Communications Law of 12 July 2024 (ustawa z dnia 12 lipca 2024 r. – Prawo komunikacji elektronicznej)), including if you are already our Client; processing of data for this purpose: Article 6(1)(a) GDPR. Consent may be withdrawn at any time via the link in the message or by e-mail to support@companynow.ai	—

Purpose	Legal basis	Our legitimate interest (where Article 6(1)(f) GDPR applies)
promoting our own services without sending commercial communications by electronic means (e.g., content published on the website and on our LinkedIn profile, postal correspondence)	Article 6(1)(f) GDPR	promoting our own services
naming the Client on the reference list on the website (§31(2) of the Terms of Service)	we name a Client who is a natural person only with that Client's consent (Article 6(1)(a) GDPR); the business name and logo of a company are not personal data	—
ensuring the security of the website and panels, preventing abuse, keeping login logs, event logs and server logs	Article 6(1)(f) GDPR	protection of services, accounts and data
displaying typefaces from the Google Fonts service (Section 9(1))	Article 6(1)(f) GDPR	a consistent and legible appearance of the website
website visit statistics in Google Analytics (Section 9(2))	consent (Article 6(1)(a) GDPR in conjunction with Article 399(1) of the Polish Electronic Communications Law)	—
online meetings (Report review sessions, workshops, webinars) and their recording	Article 6(1)(b) or (f) GDPR; recording only with consent (Article 6(1)(a) GDPR) announced at the start of the meeting	holding the meeting with the persons designated by the Client
establishment, exercise and defense of legal claims, demonstrating proper performance of the contract	Article 6(1)(f) GDPR	protection of our rights
maintaining the CompanyNow profile on LinkedIn	Section 6a	Section 6a

4a. Database of company profiles

1. We maintain a database of company profiles. It contains, among other things, the company's name, domain, industry, market, offering and track record, the company's visibility results in AI systems, the company's public contact details and the information the company itself provides in its profile. We make the database available in our products and to partners, API recipients and AI systems, including AI agents, and we use it to match companies to the needs of recipients, e.g., requests for proposals and orders. Data of companies and other legal persons are not personal data.
2. If a business is run by a natural person (e.g., a sole proprietorship), the profile also contains that person's personal data: the name contained in the business name, NIP, and business address and telephone number. These data come from public registers (e.g., CEIDG), from companies' websites, from Google company profiles and from the responses of AI systems and, where the entrepreneur is our Client, also from the entrepreneur.
3. Apart from the data of an entrepreneur who is a natural person, the database contains personal data only where the company itself provides them in its profile (e.g., the business contact details of a contact person). We do not include in the database data of employees, members of governing bodies or other natural persons obtained from other sources.
4. We have balanced our interest against your interests. The data relate exclusively to business activity and are disclosed in public sources. They do not cover private life. The profile describes the business and does not assess you as a person. Matching concerns companies and is not a decision concerning a natural person within the meaning of Article 22 GDPR.
5. **Businesses run by natural persons.** We do not make the profile of such a business available to the public, to partners, to API recipients or to AI systems and agents, do not show it in matching results and do not name it in published rankings and summaries until the entrepreneur takes over the profile in the panel or until we send the entrepreneur individual information about the processing of their data (Article 14 GDPR), together with information on the right to object. We send that information to the address given in the public register or on the business's website. Until then, we use the data of such a business only internally.
6. You may object at any time (Section 10(2)). Once the objection has been upheld, we delete your personal data from the profile.

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5. How long we keep data

1. We keep personal data only for as long as necessary for the given purpose and, once that purpose ceases, we erase them or permanently replace them with a designation from which the person's identity cannot be determined. The periods given below may be extended where the law so requires or where the data are needed for the establishment, exercise or defense of legal claims in pending proceedings.
2. Company data that are not personal data are not subject to the GDPR; we keep them on the terms of the Terms of Service.

Data	Retention period
company data that are not personal data (e.g., the company's name and domain, industry, market, indicators and visibility results in AI systems)	without time limit, as historical data and as the basis for Repeat Surveys, Monitoring, rankings and the database of company profiles
contract and order data	for the term of the contract and thereafter until the limitation period for claims expires (Article 118 of the Civil Code (Kodeks cywilny): as a rule, three years for claims related to business activity, ending on the last day of a calendar year)
purchase data (name, business name, e-mail address, NIP or VAT number, billing address, telephone number) and accounting documents	for 5 years from the end of the calendar year in which the tax payment deadline expired, or longer if the law extends the limitation period for the tax liability
account in the panel	until the account is deleted at your request (Section 11(2)) or until the end of cooperation with the organization on whose behalf the account operates
personal data in the archive of AI system responses and in the Results (e.g., the names of persons named in responses or on the websites of surveyed companies)	for as long as the Client's account exists and for 3 years from the Client's last order, whichever expires later; the archive serves the Client, is the basis for the Repeat Survey and Monitoring, and makes it possible to demonstrate proper performance of the contract. After that period, we erase the personal data or permanently replace them with a generic designation (e.g., "[management board member]"), and we retain the company data in accordance with the first row. We erase them earlier upon request (Section 11(2) and (3))
data of entrepreneurs who are natural persons in the database of company profiles (name contained in the business name, NIP, business address and telephone number)	for as long as the business is entered in a public register (e.g., CEIDG), but no longer than 3 years from the last update of the profile on the basis of public sources or from the last change made by the entrepreneur; after the business is struck off the register or after that period has expired, we delete the personal data from the profile. We delete them earlier once an objection has been upheld (Section 10(2))
inquiries and submissions from forms that did not lead to a contract	24 months from the last contact

Data	Retention period
data processed on the basis of consent (including consent to commercial communications and to being named on the reference list)	until consent is withdrawn; we keep proof that consent was given and withdrawn until the limitation period for claims expires
event log in the panel and IP addresses in sessions	12 months from the event
technical server logs (IP address, page address, time of the request)	according to the hosting provider's plan, no longer than 30 days
database backups	8 weeks; data deleted from the database disappear from the backups at the latest after that period
meeting recordings	until consent is withdrawn, no longer than 12 months from the meeting
statistical data in Google Analytics (Section 9(2))	14 months from collection; Google Analytics cookies expire after 13 months, and when consent is withdrawn we delete them from your browser

6. Who we share data with

1. We share data only to the extent necessary for the given purpose. Recipients that process data on our behalf (processors) act on the basis of data processing agreements and solely on our instructions. Some recipients do not process data on our behalf but as separate controllers (e.g., Stripe with respect to its own obligations, Google as part of Google Fonts) or as a joint controller (LinkedIn, Section 6a); we indicate this in the "Role" column.
2. We use the following providers:

Provider	What it does	Role	Location of the contracting entity	Transfer outside the European Economic Area (EEA)
Stripe Payments Europe, Limited	card payment processing, payment checkout, payment documents	processor; separate controller with respect to its own purposes (paragraph 3(d))	Ireland	yes, to the Stripe group in the USA (Section 7)
Vercom S.A. (EmailLabs)	sending e-mails from the website and panels	processor	Poland	no
Railway Corporation	hosting of the report system and panels, databases, report files, backups	processor	USA	we store data in the European Union region (Amsterdam, Netherlands); access by the provider from the USA is possible (Section 7)
Render Services, Inc.	hosting of the companynow.ai website, including the creation of payment sessions and handling of forms	processor	USA	the website runs in the European Union region (Frankfurt, Germany); access by the provider from the USA is possible (Section 7)
GoDaddy.com, LLC	domain registration and DNS services; processes the domain registrant's data (our company data) and technical query data	processor	USA	yes (Section 7)

Provider	What it does	Role	Location of the contracting entity	Transfer outside the European Economic Area (EEA)
Google Cloud Poland sp. z o.o. (Google Workspace)	team e-mail and documents, online meetings (Google Meet)	processor	Poland	yes, within Google's infrastructure (Section 7)
OpenAI Ireland Ltd	AI system surveyed in Reports and used in analytical tools	processor	Ireland	yes, to the USA (Section 7)
Google Cloud Poland sp. z o.o. (Gemini API)	AI system surveyed in Reports and used in analytical tools	processor	Poland	yes, within Google's infrastructure (Section 7)
Anthropic Ireland, Limited	AI system surveyed in Reports and used in analytical tools	processor	Ireland	yes, to the USA (Section 7)
DataForSEO OÜ	retrieval of Google search results, including Google AI Overviews and AI Mode responses, and of Google company profile data; stores task data for 365 days	processor	Estonia	yes, to sub-processors in the USA; the provider also has an office in Ukraine (Section 7)
Google LLC (Google Fonts)	delivery of the typefaces displayed on the website; the browser downloads them from Google's servers, transmitting the IP address (Section 9(1))	separate controller	USA	yes (Section 7)
Google Ireland Limited (Google Analytics)	website visit statistics, only with your consent (Section 9(2))	processor	Ireland	yes, to Google LLC in the USA (Section 7)

3. Data may also be received by:

   a) companies of the AIQ.Group, in particular AIQ.LAW Limited (Ireland) and AIQ.LAW España S.A. (Spain), which participate in serving Clients and providing services (§1(3) of the Terms of Service); they process data solely on our behalf and on our instructions, on the basis of data processing agreements, and do not use them for their own purposes. If a group company enters into a contract with a Client in its own name, it will be the controller of the data related to that contract and will provide information about this when the contract is concluded;

   b) our accounting firm, legal and tax advisers, and auditors;

   c) a Partner, if the order was placed by the Partner or for its client (§20 of the Terms of Service);

   d) Stripe Payments Europe, Limited (Ireland), which, in processing payments, acts on our behalf as a processor and, with respect to its own purposes and legal obligations, in particular fraud prevention, security and anti-money laundering, is a separate controller and processes data in accordance with its own privacy policy (stripe.com/privacy);

   e) public authorities and courts, where required by law;

   f) the Client that ordered the survey and, where the survey was ordered by a Partner or a fund, also the Partner's end client or the company to which the survey relates (§28(6) and (7) of the Terms of Service); they receive the Results, including the archive of AI system responses, which may contain the data of persons named in the responses or on the websites of surveyed companies, including competitors (Section 3a);

   g) users of our products, partners, API recipients and AI system providers, including AI agents, to whom we make the database of company profiles available: with respect to company data, including business contact details and the name of an entrepreneur doing business under their own name, on the terms of Section 4a(5).

4. AI system providers receive the content of the questions and of the web pages we survey. The rules for this transfer are described in Section 8.

6a. Our LinkedIn profile

1. We maintain a CompanyNow profile on LinkedIn. For persons in the EEA, the service is operated by LinkedIn Ireland Unlimited Company (Dublin, Ireland).

2. When you visit our profile or interact with it (following, reactions, comments), LinkedIn processes your data and prepares aggregated statistics for us (Page Insights), e.g., about the job function, industry, country, seniority and company size of visitors. With respect to these statistics, we and LinkedIn Ireland Unlimited Company are joint controllers (Article 26 GDPR), on the basis of the LinkedIn "Page Insights Joint Controller Addendum".

3. The essence of the arrangement: LinkedIn is responsible for preparing the statistics, for informing members of the service about the processing and for giving effect to their rights. We receive only aggregated data from which we cannot identify individuals. You can exercise your rights in your LinkedIn account settings or directly with LinkedIn. We will promptly forward to LinkedIn any request that reaches us. The lead supervisory authority is the Irish Data Protection Commission.
4. We process comments, messages and the data of persons who correspond with us via LinkedIn as a controller on the basis of Article 6(1)(f) GDPR; our legitimate interest is communication about our business. We send commercial messages via LinkedIn only with consent (Section 4).
5. More information: LinkedIn's privacy policy (linkedin.com/legal/privacy-policy).

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7. Transfers of data outside the European Economic Area

1. Some recipients process data outside the European Economic Area (EEA) or have access to them from outside the EEA. In such cases, we apply safeguards under Chapter V GDPR:
    a) **Commission Implementing Decision (EU) 2023/1795 of 10 July 2023 on the EU–US Data Privacy Framework** with respect to recipients in the USA with active certification: Stripe, LLC (the Stripe group, to which Stripe Payments Europe, Limited transfers data); Railway Corporation; Render Services, Inc. (on the list of certified organizations as "Render"); GoDaddy.com, LLC (under the certification of GoDaddy Operating Company, LLC). Our contracts with these recipients also provide for standard contractual clauses in the event of loss of certification or repeal of the decision. Google LLC, which, as part of Google Fonts, receives data directly from your browser as a separate controller, also has active certification; it also covers the Google Analytics data that Google Ireland Limited transfers to Google LLC;
    b) **standard contractual clauses** adopted by Commission Implementing Decision (EU) 2021/914 with respect to: OpenAI (transfer from OpenAI Ireland Ltd to the USA), Anthropic (transfer from Anthropic Ireland, Limited to the USA), Google (Google Workspace and Gemini API, transfer to the countries in which Google processes data) and the sub-processors of DataForSEO OÜ outside the EEA.
2. DataForSEO OÜ also has an office in Ukraine, in respect of which the European Commission has not adopted an adequacy decision. Access to data from that office is possible only on the basis of standard contractual clauses.
3. Vercom S.A. (EmailLabs), AIQ.LAW Limited and AIQ.LAW España S.A. process data in the EEA.
4. We check the certification status of recipients on the dataprivacyframework.gov list whenever we change a provider and whenever this policy is amended.
5. A copy of the safeguards applied can be obtained by writing to support@companynow.ai.

8. AI systems and automated processing

1. In our surveys, we put questions to AI systems (in particular ChatGPT, Gemini, Claude, and Google AI Overviews and AI Mode) via their application programming interfaces. The questions concern companies and their offering. They may contain the business name and, where the business name contains the entrepreneur's name, that data as well. We do not include any other personal data in the questions.
2. We also use AI systems in our own analytical tools, e.g., to classify responses and prepare a draft of the Report. In doing so, we provide them with the content of the surveyed companies' web pages and the responses of AI systems, which may contain the data of the persons referred to in Section 3a.
3. AI system providers process the content provided as our processors, on the basis of data processing agreements. Under their terms, content submitted via application programming interfaces is not used to train models. The providers store it temporarily for the purpose of abuse detection: OpenAI and Anthropic, as a rule, for up to 30 days, and Google (Gemini API) for a limited period specified in Google's terms. Where the provider allows this, we disable the storage of responses on its side. DataForSEO OÜ, through which we retrieve Google search results, including Google AI Overviews and AI Mode responses and Google company profile data, stores task data for 365 days.
4. We do not make decisions concerning you based solely on automated processing, including profiling, which would produce legal effects concerning you or similarly significantly affect you (Article 22 GDPR). Reports, the database of company profiles and matching concern companies, not individuals; Reports are subject to analyst review (§18 of the Terms of Service).

9. Cookies and similar technologies

1. **The companynow.ai website** does not store cookies on your device without your consent. Your browser downloads the typefaces used on the website from the servers of Google LLC (USA) as part of the Google Fonts service. In the process, Google receives your IP address, browser information and the address of the page visited. Google processes them as a separate controller, in accordance with its own privacy policy (policies.google.com/privacy). The transfer to the USA takes place on the basis of the decision on the EU–US Data Privacy Framework (Section 7). The Google Fonts service does not store cookies. Downloading resources from fonts.googleapis.com can be blocked in your browser settings or with a browser extension; the website will then work with a fallback typeface.

2. **Google Analytics.** If you click "Accept" on the consent bar, the website starts Google Analytics 4 (provider: Google Ireland Limited). We use it for statistics only: which pages are visited, where visitors come from (e.g. a search engine or a link), and from which country and device. In the process, Google receives, among other things, your IP address (Google Analytics 4 does not store it in the data), information about your browser and device, and the addresses of the pages visited. Advertising features, Google signals and ad personalisation are switched off, and in the Google Analytics account settings we do not share data with Google for its own purposes. Without consent, Google Analytics does not load. You can withdraw or change your consent at any time using this link, which reopens the consent bar; withdrawal does not affect the lawfulness of processing before it. We do not use advertising tools or tracking pixels, and we do not use analytics tools in the panels.

Name	Where	Purpose	Duration
`_ga`	website (companynow.ai), only after consent	Google Analytics: distinguishing visitors; contains a random identifier	13 months
`_ga_Z81LYD3826`	website (companynow.ai), only after consent	Google Analytics: keeping the session state	13 months
`cn-consent` (browser storage, not a cookie)	website (companynow.ai)	remembering your choice on the consent bar so that we do not ask on every page	12 months, then we ask again

3. **The payment checkout** runs on the Stripe service. Stripe stores its own cookies there, which are necessary to carry out the payment and prevent fraud, in accordance with its own rules.

4. **The client panel and the partner panel** store only two cookies, which are necessary to provide the service you request; they do not require consent (Article 399(3)(2) of the Electronic Communications Law of 12 July 2024). The panels do not use any other browser storage technologies or resources loaded from external servers.

Name	Where	Purpose	Duration
`panel_sesja`	panel (app.companynow.ai)	maintaining the logged-in session; contains a random identifier	until the browser is closed; the session expires after 30 minutes of inactivity, and at the latest after 12 hours
`panel_csrf`	panel (app.companynow.ai)	protecting forms against request forgery (CSRF)	until the browser is closed

5. You can delete or block cookies at any time in your browser settings. Blocking the panel cookies will make it impossible to sign in.
6. If we start using cookies or other technologies that require consent, we will ask for your consent before using them and update this policy.

10. Rights of data subjects

1. You have the right to:
    a) access your data and obtain a copy of them, together with information on the source of the data (Article 15 GDPR);
    b) rectification and completion of data (Article 16 GDPR);
    c) erasure of data (Article 17 GDPR);
    d) restriction of processing (Article 18 GDPR);
    e) portability of data processed on the basis of a contract or consent by automated means (Article 20 GDPR);
    f) withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal (Article 7(3) GDPR).
2. **Right to object (Article 21 GDPR).** You may object at any time, on grounds relating to your particular situation, to the processing of data based on our legitimate interest, including processing in the database of company profiles (Section 4a), in rankings and summaries, and in surveys. An objection to processing for direct marketing purposes is always effective, without the need to give reasons.
3. You have the right to lodge a complaint with a supervisory authority: in Poland, with the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych) (ul. Stanisława Moniuszki 1A, 00-014 Warszawa), as well as with the supervisory authority in the EU Member State in which you live or work or in which the infringement occurred (e.g., the CNIL in France, the AEPD in Spain).

11. How to exercise your rights

1. A request may be sent to support@companynow.ai or in writing to our registered office address. We also handle requests sent to any of our other addresses (Section 1(2)). Each message containing commercial communications also includes an unsubscribe link.

2. **Deletion of account data and the Client archive.** At your request, we delete the account data in the panel within one month: e-mail address, name, password and two-step verification data, sessions together with IP address and browser information, access links, memberships and guest access, and messages awaiting dispatch; the account is disabled. At the request of an organization, we delete from its account, within one month, the Input Data, orders and Results (the Client archive). Company data that are not personal data, including measurement results and AI system responses concerning companies, are retained in our database on the terms of the Terms of Service (§28(5) and §29) and are not deleted at the organization's request. We keep personal data contained in those results for the period specified in Section 5, and before that we erase them or replace them with a designation at the request of the person concerned (paragraph 3). We retain purchase data for the period required by accounting and tax regulations, and event log entries (account identifier and IP address) for 12 months from the event, in order to ensure the security of the service. Backups expire within 8 weeks, so deleted data disappear from them at the latest after that period.
3. **Data in the responses of AI systems.** The response archive documents what an AI system wrote on the survey date, so we do not change its content. If a response contains untrue information about you, at your request we attach your rectification to it as a supplementary statement (Article 16 GDPR). Upon a request for erasure or once an objection has been upheld, we replace your data in the archive and in the Results with a generic designation and do not use them in subsequent surveys, unless we need them for the establishment, exercise or defense of legal claims. In response to an access request, we also state the source of the data (e.g., the AI system and the date of the response, or the web page address).
4. We respond without undue delay and in any event within one month of receiving the request. Where a request is complex or there are a large number of requests, that period may be extended by two further months; we will inform you of this before the first month expires.
5. If we have reasonable doubts concerning the identity of the person making the request, we may ask for additional information necessary to confirm it, e.g., that the request be sent from the e-mail address assigned to the account.
6. Making a request is free of charge. For requests that are manifestly unfounded or excessive, we may charge a reasonable fee or refuse to act on them (Article 12(5) GDPR).

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12. Is providing data mandatory

1. Providing data is voluntary, but without the data indicated in the payment form, the order form or when creating an account, we cannot conclude or perform the contract, issue an invoice or create an account.
2. Providing contact data in a form is voluntary, but without them we will not respond to the inquiry.
3. Consent to commercial communications and consent to being named on the reference list are voluntary and do not affect the possibility of ordering services.

13. Data entrusted by Clients

1. If a Client provides us, in the Input Data, with personal data of which it is the controller, we process such data as a processor, solely for the purpose of providing the services and on the Client's instructions (§23(2) of the Terms of Service).
2. The rules for this processing are set out in the data processing agreement constituting Annex No. 2 to the Terms of Service, concluded together with the contract for services. Sub-processors are listed in Section 6. We give notice of any intended change of sub-processors at least 14 days before the change by updating Section 6 and, to Clients that have requested this at support@companynow.ai, also by e-mail; the Client may object on the terms of the data processing agreement.
3. Requests concerning the exercise of rights with respect to such data should be addressed primarily to the Client as controller. We will forward to the Client any request that reaches us.

14. Security

1. We apply technical and organizational measures appropriate to the risk, in particular: encryption of data in transit, role-based access control, two-step verification in the panel, storage of passwords in hashed form only, limitation of the number of login attempts, event logs, backups and data minimization.
2. Access to data is granted only to persons who need it to perform their duties and are bound by confidentiality.

15. Changes to this policy and language versions

1. We update this policy when the law, our services, our providers or the manner of data processing change. We inform account holders of material changes by e-mail or by a notice in the panel. The current version, with its effective date, is always available on the website.
2. This policy is available in Polish, English, French and Spanish. The Polish version is the original version; the other versions are translations of it with the same content, published on the same day. In the event of any discrepancy between the Polish version and a translation, the Polish version shall prevail.