

PRIVACY POLICY

The Privacy Policy is effective as of 22.04.2025.

I. General Information

1. This Privacy Policy sets forth the rules aimed at informing about all aspects of the process concerning the collection, processing, and protection of your personal data. The Policy is addressed to all users (hereinafter: "Users") of the Administrator's Website.
2. This Privacy Policy establishes the rules for the processing of personal data by the Data Administrator, which is: **Outline AI Sp. z o.o., Tax ID (NIP): 7831816009, National Court Register (KRS): 0000838689, REGON: 385946724, address: ul. Trzy Lipy 3, 80-172 Gdańsk, Poland** (hereinafter: "Administrator").
3. Contact regarding the processing of personal data is possible via email at: contact@outlineai.com or by mail to the Administrator's registered office address.
4. This Privacy Policy may be amended and updated in the event of changes in personal data processing practices or changes in generally applicable law. The Administrator will duly inform Users of the Website about changes to the Policy by posting appropriate information on the Website.
5. Using the Administrator's Website and Electronic Services requires the User to review and accept the content of this Privacy Policy and the Terms and Conditions of Electronic Services.
6. Providing personal data to the Administrator is voluntary but is a necessary condition for using the Website and Electronic Services.

II. Definitions

1. **Administrator** means the entity that determines how and for what purposes Personal Data is Processed. The Administrator is responsible for ensuring that the processing complies with applicable data protection laws.
2. **Personal Data** means any information relating to an identified or identifiable natural person.
3. **Process, Processing, or Processed** means any operations performed on Personal Data, whether automated or not, such as: collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
4. **Processor** means any person or entity that Processes Personal Data on behalf of the Administrator (other than an employee of the Administrator).
5. **Website** - <https://outlineai.com/>
6. **Administrator's Social Media Fanpages:**
 - LinkedIn at <https://www.linkedin.com/company/outline-ai/>
 - X (Twitter) at https://x.com/outline_ai
 - Instagram at https://www.instagram.com/outline_ai/
 - Youtube at <https://www.youtube.com/@outlineai2889>

7. **Electronic Services** - services provided through the Website. The provision of Electronic Services to Users on the Website is subject to the terms specified in the [Terms and Conditions of Electronic Services](#) and the [Industrial Application Terms and Conditions](#).

III. Processing of Users' Personal Data

1. The Administrator may collect Users' Personal Data, in particular, in the following cases:
 - a. **When Users provide Personal Data (e.g., via email, phone, contact form, or any other method)** *based on Article 6(1)(f) of the GDPR (legitimate interest of the Administrator – responding to a message or inquiry) in connection with the need to handle a reported matter or inquiry,*
 - b. **When Personal Data is collected as a result of Users' registration on the Administrator's Website, e.g., creating an Account and enabling its use, handling requests and complaints, for the purpose of concluding and performing a contract, based on Article 6(1)(b) of the GDPR (performance of a contract/acceptance of the Terms and Conditions of Electronic Services), including, e.g., handling the complaint process, based on Article 6(1)(b) of the GDPR,**
 - c. **Pursuing claims and taking actions related to defending the Administrator's rights, conducting legal proceedings, and, among others, enabling the use of the Website through cookies, preventing fraud in the use of the Website and Electronic Services, in particular for the maintenance, improvement, and provision of all its functionalities, as well as creating reports, analyses, and statistics for the Administrator's internal needs. This includes, in particular: reporting, marketing research, planning the development of the Website and Electronic Services, development work, opinion surveys, and creating statistical models, based on Article 6(1)(f) of the GDPR (aforementioned legitimate interest of the Administrator),**
 - d. **Collecting Personal Data of Users published on social media (Administrator's Fanpage) (e.g., collecting information from Users' private social media profiles to the extent that such information is publicly visible) based on Article 6(1)(f) of the GDPR (legitimate interest of the Administrator – promoting its own activities and services, managing a social media profile (Fanpage), building and strengthening customer relationships, conducting analyses and statistics regarding the popularity and functioning of the profile, as well as establishing, pursuing, and defending against potential claims related to the use of the profile, responding to contact),**
 - e. **User's consent to the processing of provided personal data for the purpose of sending a Newsletter, based on Article 6(1)(a) of the GDPR (consent), sending commercial information – Newsletter, sharing marketing content via telephone communication or SMS messages, based on the Act of July 12, 2024, on Electronic Communications Law,**
 - f. **Collecting or requesting Users to provide Personal Data during visits to the Administrator's websites or use of any features or resources available on or through the Website – including**

cookies and those of third parties. When Users visit the Website, their devices and browsers may automatically share certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connection to the Website, and other technical communication information), some of which may constitute Personal Data. During a visit to the Website, no Personal Data of Users will be stored by the Administrator without an appropriate legal basis. Regarding cookies, the Administrator – apart from essential cookies – will always obtain the User’s consent for the installation of other cookies (including third-party cookies, such as Google Analytics). Providing the aforementioned consent is optional and does not affect the ability to use the Website. Processing is *based on Article 6(1)(a) of the GDPR (consent – for non-essential cookies) and Article 399 of the Electronic Communications Law (legal provision – for essential cookies).*

2. Providing Personal Data is voluntary and not a statutory obligation. However, in certain cases, failure to provide Personal Data may prevent the use of the Website or Electronic Services. The categories of Users’ Personal Data processed by the Administrator may include, in particular:

- a. **Personal details:** first name(s), last name(s).,
- b. **Contact details:** company details, email address, phone number.
- c. **Content of communications:** all communications (inquiries, statements, views, and opinions) sent via the contact form or published on the Administrator’s Website or Fanpages by the User.
- d. **IP address, cookies, and information about the use of our Website and Electronic Services –** during the use of the Website or Electronic Services.
- e. **Image:** in the case of posting opinions, leaving comments, or clicking the “Like” button on the Administrator’s social media Fanpage (if the User has made their image publicly available on their private account on that platform).
- f. **Behavioral data (with consent for Google Ads):** Information about the User’s activity on websites, clicks on advertisements, data on time spent on the website, and interactions with content.

3. The Administrator uses Fanpage-type profiles on social media platforms. Public data shared by Users on social media may be used for:

- a. Responding to private messages directed to us.
- b. Conducting discussions within comments under individual posts.
- c. Sharing our posts with individuals following our Fanpage.
- d. Marketing purposes, consisting of informing about our services and ourselves through posts placed on our Fanpage, including sponsored posts displayed to a wider group of Users.

- e. Statistical purposes, consisting of presenting data on the visibility of our posts, their reach, and the number of interactions; the data provided to us by the owners of social media platforms are statistical data but are created based on observations of behavior on our Fanpage.
4. Currently, the Administrator's Website includes redirects to the following social media platforms (Fanpage):
- LinkedIn - <https://www.linkedin.com/company/outline-ai/>
5. Upon liking the Administrator's post, leaving a comment, sending a private message, or subscribing to a channel, the Administrator, together with:
- Meta Platforms Ireland Limited, Block J, Serpentine Avenue, Dublin 4, Ireland
 - LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland.
 - Twitter International Unlimited Company, Attn: Data Protection Officer, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 IRELAND
 - Google Ireland Limited Google Building Gordon House, 4 Barrow St, Grand Canal Dock, Dublin 4, D04 V4X7, Ireland
- becomes the joint controller of the personal data shared on its Fanpage for statistical and advertising purposes.
6. In this regard, we encourage you to review the privacy policies of the aforementioned entities:
- LinkedIn - <https://pl.linkedin.com/legal/privacy-policy>
 - Serwis X - <https://twitter.com/pl/privacy#x-privacy-9.1>
 - Instagram- <https://privacycenter.instagram.com/policy/>
 - Youtube- <https://policies.google.com/privacy?hl=pl>

IV. Sharing Personal Data with Third Parties

1. The Administrator may share Users' Personal Data with:
- a. Entities entrusted with data processing, e.g., providers of technical services or entities providing advisory services,
 - b. Other administrators, if required by law or in good faith that such action is necessary to comply with applicable legal provisions, particularly in response to a request from a court or state authorities.
2. If we engage a third party to Process Users' Personal Data, pursuant to a data processing agreement concluded with such entity, the Processor will be obligated to:
- a) Process only the Personal Data specified in prior written instructions from the Administrator; and
 - b) Implement all measures to protect the confidentiality and security of Personal Data and ensure compliance with all other requirements of generally applicable law.

3. Due to the use of Instagram and LinkedIn services, data may be transferred by these entities to third countries, specifically the United States of America (USA), in connection with their internal sharing, e.g., with Facebook - Meta Platforms Inc., LinkedIn Corporation, or X Corp., over which the Administrator has no control.

V. Third-Party Services

1. The Website may contain features or links redirecting to websites and services provided by third parties that are not managed by us. Information you provide on these websites or services will be subject to their own privacy policies and data processing procedures.
2. The Administrator is not responsible for the procedures related to data processing by independent administrators of websites and service providers.
3. We encourage you to review the privacy and security policies of third parties before providing them with any information.

VI. Data Protection

1. The Administrator informs that it has implemented appropriate technical and organizational measures to protect Personal Data, including safeguards against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of Processing, in accordance with applicable law.
2. The Administrator is not responsible for the actions or omissions of Users. Users are responsible for ensuring that all Personal Data is transmitted to the Administrator securely.
3. Personal Data will not be subject to automated profiling, i.e., automated decision-making regarding the User, meaning decisions made by technical means without human involvement, which produce legal effects concerning the profiled person or otherwise significantly affect the profiled person.

VII. Data Accuracy

1. The Administrator takes all appropriate measures to ensure that:
 - a. The Personal Data of Users Processed by the Administrator is accurate and, if necessary, updated;
 - b. All Personal Data of Users Processed by the Administrator that is inaccurate (considering the purpose for which it is Processed) will be deleted or corrected without undue delay.
2. The Administrator may, at any time, inquire about the accuracy of the Personal Data being Processed.

VIII. Data Minimization

The Administrator takes all appropriate measures to ensure that the scope of Users' Personal Data Processed is limited to the Personal Data reasonably required for the purposes specified in this Privacy Policy.

IX. International Data Transfers

Personal Data may be shared and processed outside the European Economic Area (the European Economic Area comprises the European Union, Iceland, Liechtenstein, and Norway, collectively “EEA”). If Personal Data is transferred outside the EEA, the Administrator requires appropriate safeguards. The Administrator will fulfill its obligations under Chapter V of the GDPR to ensure the lawfulness of such processing.

X. Personal Data Retention Period

1. The criteria determining the duration of the period for which the Administrator retains Users’ Personal Data are as follows: The Administrator retains Users’ Personal Data in a form that allows identification only for as long as necessary to achieve the purposes specified in this Privacy Policy, unless generally applicable law requires a longer retention period. In particular, the Administrator may retain Users’ Personal Data for the entire period necessary to establish, exercise, or defend claims (limitation of claims pursuant to Article 118 of the Civil Code).
2. Personal Data is retained:
 - a. For a period of 30 days from the moment of contact (phone, email via the Website); Personal Data may be processed for a longer period if, as a result of the submitted inquiry, the User decides to use the Administrator’s services (Website Account, Newsletter, conclusion of a contract);
 - b. In the case of using our services (Website Account, conclusion of a contract), for the duration of the contract, maintenance of the Account, and the period necessary to handle submitted complaints, until the resolution of any disputes and settlement of the parties, taking into account the applicable limitation periods for claims;
 - c. For the Administrator’s internal purposes, where the legal basis for processing is the Administrator’s legitimate interest, Personal Data will be retained until the legitimate interests of the Administrator, which form the basis for processing, are fulfilled, or until an objection to such processing is lodged, following the Administrator’s appropriate analysis of the User’s interest and the basis for processing;
 - d. In the case of data processed on our Fanpage, until the User ceases to follow/comment on our Fanpage, e.g., by clicking “unlike,” withdrawing a post like, deleting a comment, or unsubscribing,
 - e. In the case of using our Newsletter service, for the duration of the service or until the User withdraws consent to receiving commercial information electronically.

XI. Google Analytics

1. The Administrator uses the Google Analytics tool provided by Google LLC, with infrastructure located at Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. The Administrator notes that Google LLC (1600 Amphitheatre Parkway, Mountain View, California

94043, USA) has joined the EU-US Data Privacy Framework, ensuring an adequate level of personal data protection in accordance with the GDPR.

2. Google Analytics enables:
 - a) **Tracking website traffic:** information about the number of users, visits, and sources of traffic (e.g., advertisements, search engines, social media).
 - b) **Monitoring user behavior:** analysis of which pages are most frequently visited, time spent on the website, and bounce rate.
 - c) **User segmentation:** demographic, geographic, and technological data (e.g., device type, browser).
 - d) **Tracking goals and conversions:** analysis of how users perform specific actions, such as purchases, newsletter sign-ups, or downloading materials.
3. Google Analytics processes data that may include:
 - a) **IP addresses:** used to identify the geographic location of users, which, in combination with other data, may constitute Personal Data.
 - b) **Cookies:** storing unique user and session identifiers, enabling tracking of their activity, only after the User provides appropriate consent.
 - c) **Technical data:** e.g., browser type, operating system, screen resolution, internet service provider.
4. The Administrator uses the IP anonymization function, which prevents user identification (the last octet of the IP address is masked before data storage or processing).
5. The Administrator processes data using the specified tool to provide analyses and reports on website traffic and the effectiveness of marketing activities, based on the Administrator's legitimate interest and the User's consent (acceptance of Google Analytics cookies). The Administrator has entered into an appropriate Data Processing Agreement with Google, regulating data security issues as required by law.
6. The retention period for collected data, in the case of accepting Google Analytics cookies, is 14 months for user data and 2 months for event data.
7. We encourage you to review Google's Privacy Policy at: <https://policies.google.com/privacy?hl=en>
8. Users can configure their browser to block cookies related to Google Analytics. Google Analytics uses cookies such as `_ga`, `_gid`, and `_gat`.
9. Users can also use a plugin to block Google Analytics. Google offers a browser add-on to block Google Analytics, available for download from the official website: <https://tools.google.com/dlpage/gaoptout>. Once installed, the plugin prevents data from being sent to Google Analytics from all visited websites.

XII. Google Ads

1. The Administrator uses the **Google Ads** tool, an advertising tool provided by Google LLC, with infrastructure located at Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. The Administrator notes that Google LLC (1600 Amphitheatre Parkway, Mountain View, California 94043, USA) has joined the EU-US Data Privacy Framework, ensuring an adequate level of personal data protection in accordance with the GDPR.
2. The Google Ads service enables the use of tracking technologies, such as cookies and remarketing tags, which allow the display of advertisements tailored to users' interests.
3. Google Ads may collect and process data related to users' interactions with our advertisements and website, including:
 - a) IP addresses,
 - b) Device identifiers,
 - c) Browser information,
 - d) Geolocation data, and
 - e) Browsing history.This data is processed to evaluate the effectiveness of advertising campaigns and optimize advertising content.
4. Users can manage their advertising preferences through Google Ads settings (<https://adssettings.google.com>) and opt out of personalized ads via the Network Advertising Initiative website: <https://www.networkadvertising.org/choices/>
5. We encourage you to review Google's Privacy Policy at: <https://policies.google.com/privacy?hl=en>

XIII. Users' Rights

1. In connection with the processing of personal data, you have the following rights:
 - a. **Right of access to processed personal data** – Upon the request of the data subject, the Administrator provides information about the processing of their personal data, including, in particular, the purposes and legal bases for processing, the scope of the data held, the entities to which the personal data is disclosed, and the planned date of its deletion. As part of the right of access, the data subject may also request information about to whom their personal data is disclosed and whether it is subject to profiling or automated decision-making. The data subject also has the right to obtain a copy of their data.
 - b. **Right to rectification of data** – Upon the request of the data subject, the Administrator corrects any inaccuracies or errors in the processed personal data and completes or updates it if it is incomplete or has changed;
 - c. **Right to erasure of data** – Upon the request of the data subject, the Administrator deletes data that is no longer necessary for any of the purposes for which it was collected, where consent

for its processing has been withdrawn, or an objection has been raised, and it is not required for establishing, pursuing, or defending the Administrator's claims;

- d. **Right to restriction and portability of processing** – Upon the request of the data subject, the Administrator ceases performing operations on such personal data to the extent permitted by law and provides the personal data in a format that allows it to be read by a computer;
 - e. **Right to lodge a complaint** – If a person believes that their personal data is being processed in violation of applicable law, they may lodge a complaint with the President of the Personal Data Protection Office (ul. Stawki 2, 00-193 Warsaw);
 - f. **Right to object** – The data subject may, at any time, object to the processing of their personal data for the purposes for which it was collected and is being processed,
 - g. **Right to withdraw consent** – If we process personal data based on consent, the data subject may withdraw this consent at any time. Withdrawal of consent does not render the processing of personal data up to that point unlawful, and it does not affect the lawfulness of prior processing; however, it will result in the personal data no longer being used for those purposes from the moment of withdrawal.
2. The request should, to the extent possible, precisely indicate what it concerns, including the recipient of the request and which of the above-mentioned rights the requesting person wishes to exercise. If the Administrator is unable to determine the content of the request or identify the requesting person based on the submitted request, it will contact the requester for additional information.

XIV. Cookies

- 1. When a User uses the Website, data about the User is automatically collected. This data may include:
 - a. IP address,
 - b. Domain name,
 - c. Browser type,
 - d. Operating system type.
- 2. This data may be collected through:
 - a. Cookies,
 - b. Google Analytics system
 - c. Google Ads system,
 - d. and may be stored in server logs.
- 3. A cookie is a small piece of text information in the form of text files stored by the browser on your computer's hard drive or on the memory card of a smartphone. During subsequent visits to the

Website, the information stored in the cookie is sent back to the Website. This allows the Website to recognize you and tailor content to your needs.

4. To improve our Website and Electronic Services, deliver the most relevant content, and analyze how Users interact with our Website, we may use cookies.
5. We may process data contained in cookies for the following purposes:
 - a. Personalizing the Website and Electronic Services: remembering User information so that the User does not have to re-enter it during subsequent visits;
 - b. Providing advertisements, content, and information tailored to the User;
 - c. Monitoring aggregated website usage metrics, such as the total number of visitors and pages viewed.
6. We use the following types of cookies:
 - a. Session cookies, which are temporary files stored on the visitor's device until they leave the Website;
 - b. Persistent cookies, which are stored on the visitor's end device for the time specified in the cookie parameters or until manually deleted;
7. Cookies can be divided into the following categories:
 - a. Essential cookies: Essential cookies contribute to the usability of the Website by enabling basic functions such as navigation and access to secure areas of the Website. The Website cannot function properly without these cookies.
 - b. Statistical cookies: Statistical cookies help Website owners understand how different users behave on the Website by collecting and reporting anonymous information (checkbox to select);
 - c. Functional cookies: cookies enable the Website to remember information that changes the appearance or functionality of the Website, e.g., preferred language or region of the User (checkbox to select),
8. We use analytics and similar services that include third-party cookies. When using the Website, third-party cookies may be used to enable Website functionalities and integration with other websites or to analyze the effectiveness of advertising campaigns and collect anonymous information about Website usage for statistical purposes.
9. This Privacy Policy does not govern the use of third-party cookies. Each third party sets its own rules for using cookies in its privacy policy.
10. The Website uses the Google Analytics tool. You can prevent Google from recording data collected by cookies regarding your use of the Website, as well as the processing of such data by Google, by installing the browser plugin available at: <https://tools.google.com/dlpage/gaoptout>

11. You can also change how cookies are used by utilizing the Cookiebot cookie management tool – cookie declaration. The tool is available on the Website a <https://outlineai.com/>.
12. Please note that refusing, deleting, blocking, or restricting the placement of cookies may cause difficulties or even prevent the use of the Website or Electronic Services.