# **Privacy and Cookies Policy**

# **General Information**

Software Solutions Spółka z ograniczoną odpowiedzialnością ensures the security of user data, including personal data, for visitors to the websites gmplanner.com and gmplanner.pl. The following information guarantees the confidentiality and proper use of personal data.

To enhance the accessibility of this Privacy and Cookies Policy, the term "User" has been replaced with "You," and "Administrator" with "We." We have also introduced subheadings to help you find relevant information more easily.

This Policy specifically covers the website gmplanner.com, the GM Planner mobile application, and all other websites we own (hereinafter referred to as the "Website" or "Websites").

# **Data Controller**

The controller of your personal data is Software Solutions Spółka z ograniczoną odpowiedzialnością, headquartered in Warsaw, Aleja Wilanowska 9a m100, 02-765 Warsaw, registered in the Register of Entrepreneurs of the National Court Register maintained by the District Court for the Capital City of Warsaw in Warsaw, XIII Commercial Division of the National Court Register under KRS number 0001162628, NIP 9512617671, REGON 54121728400000.

You can contact us via email at: customer@gmplanner.com

# **Data Protection Officer**

To enhance the security of your personal data, we have appointed a Data Protection Officer – Mr. Adrian Wojtkowski. You can contact the Data Protection Officer via email at: customer@gmplanner.com

# **Personal Data We Collect**

Providing personal data is voluntary but necessary to conclude and perform a contract. In cases of legal requirements, we may request additional data, e.g., for accounting or tax purposes.

# Information You Provide:

We require the following personal data:

- Email address
- First name
- Last name
- Gender

- Data for BMI calculation
- Height
- Date of birth
- Purpose of sports recommendation (weight loss / fitness maintenance / muscle gain)
- Injuries
- Fitness level (unfit / standard / fit)
- Sleep duration (less than 5 hours / 5–7 hours / more than 7 hours)
- Body fat level (high body fat / standard / no excess body fat)

If using notifications:

- Email address
- First name

If you do not provide the required personal data, we will not be able to conclude a contract with you, and you will not be able to use our services.

Additionally, we may process:

- Information from correspondence (email, contact forms, traditional mail)
- Information from surveys (unless anonymous)
- Information shared in comments or discussions on the Website

## Information We Collect Automatically:

We automatically collect information such as:

- Device IP address
- Address of the page visited directly before our Website
- Actions taken on the Website or in the Application
- Search queries
- Time, frequency, and duration of visits
- Browser and operating system type
- Device type and its identifier
- Information from cookies and similar technologies
- Interactions with emails (opens, clicks, forwards)

## How We Use Your Data

We process your personal data for the following purposes:

- **Providing Our Services to You:** Enabling you to use our services. Legal basis: necessity to conclude and perform a contract with you (Art. 6(1)(b) GDPR).
- **Managing and Improving Our Operations:** Managing and improving the Website, enhancing our offerings, detecting and preventing financial and other abuses. Legal basis: our legitimate interest (Art. 6(1)(f) GDPR).
- **Personalizing Content:** Personalizing offers and advertisements displayed to you on the Website or Application. Legal basis: your consent (Art. 6(1)(a) GDPR) or our legitimate interest (Art. 6(1)(f) GDPR), depending on the situation.
- **Communicating and Interacting with You:** Responding to your inquiries, comments, etc. Legal basis: your consent (Art. 6(1)(a) GDPR) or our legitimate interest (Art. 6(1)(f) GDPR), depending on the situation.
- **Resolving Disputes, Handling Complaints or Claims:** Addressing complaints, legal claims, or disputes involving you or us. Legal basis: your consent (Art. 6(1)(a) GDPR) or our legitimate interest (Art. 6(1)(f) GDPR), depending on the situation.
- **Fulfilling Legal Obligations:** For example, tax law requirements. Legal basis: necessity to comply with a legal obligation (Art. 6(1)(c) GDPR).

## **Sharing Your Data**

We may share your personal data with:

- Individuals cooperating with us under civil law contracts
- Providers of courier and postal services
- Providers of electronic payment services
- Providers of IT and network infrastructure
- Providers of technologies used by the Website
- Accounting service providers
- Other entities if necessary to achieve the purposes of data processing

Data may also be shared in the following situations:

- When required by law or public authority
- To establish, exercise, or defend our rights
- In case of restructuring, sale, or transfer of business ownership

In each case, we share the narrowest possible scope of data necessary to achieve the processing purpose.

# **Your Rights**

You have the right to:

- Access your personal data
- Rectify data
- Delete data
- Restrict processing
- Data portability
- Withdraw consent (if processing is based on consent) at any time

You also have the right to object to the processing of personal data based on our legitimate interest, including profiling. In the case of data processing for direct marketing purposes, you have the right to object at any time.

To exercise your rights, contact the Data Protection Officer.

You have the right to lodge a complaint with a supervisory authority if you believe that the processing of your personal data violates the law.

# **International Data Transfers**

Personal data may be transferred and stored outside the European Economic Area (EEA). In such cases, we ensure an adequate level of data protection in accordance with Articles 44–49 of the GDPR, e.g., by using standard data protection clauses adopted by the European Commission.

To obtain a copy of personal data transferred to a third country, contact the Data Controller.

# **Data Retention Period**

We retain your personal data:

- In connection with contract performance for the duration of the contract and until the expiration of any claims
- Based on legitimate interest until the interest expires or an objection is raised
- In connection with legal obligations for the period required by law
- Based on consent for 3 years from the date of consent or until it is withdrawn

If data is processed on more than one basis, we retain it until none of the bases apply.

## Minors

The Websites are not intended for individuals under 18 years of age. We do not knowingly collect personal data from minors. If we become aware that we have such data, we will delete it promptly. If you suspect that we have collected data from a minor, please contact the Data Protection Officer.

## Cookies

We use cookies to:

- Provide access to services
- Improve the Websites and applications
- Ensure security
- Better present services for marketing purposes
- Personalize offers

## **Types of Cookies**

Cookies can be categorized based on their storage duration, origin, and necessity for service functionality:

## By Storage Duration:

- Session Cookies: These are temporary cookies that are deleted once you log out or close your browser. <u>GDPR.eu+1All About Cookies+1</u>
- **Persistent Cookies**: These remain on your device for a set period or until you manually delete them.

## By Origin:

- **First-Party Cookies**: Set directly by us, these cookies are stored by the website you are visiting.
- **Third-Party Cookies**: Set by our partners, these cookies originate from domains other than the one you are visiting.

## By Necessity for Service Functionality:

- **Strictly Necessary Cookies**: Essential for the proper functioning of the website, application, or specific features you wish to use. <u>GDPR.eu</u>
- **Functional Cookies**: These allow us to analyze how you use the website or application, such as which links you click and your browser settings.
- Advertising/Business Cookies: These help assess the effectiveness of advertising and marketing efforts. They are provided by our partners and are used to analyze and

track visits to the website and application, as well as the effectiveness of advertisements.

# **Our Cookies (Strictly Necessary Cookies)**

These cookies are integral to the operation of the website and application, enabling functionalities such as proper page display, user login, and shopping cart usage.

**Opt-out**: You can configure your browser to not use any cookies. However, opting out may negatively impact the functionality and features of the website and application.

# **Google Analytics (Functional Cookies)**

Our websites and applications use Google Analytics, a service provided by Google Inc., to analyze how you use the website and application, which helps us improve them. Information collected by Google in connection with your use of the website and application (e.g., visited subpages, language settings, operating systems used) is transmitted to a Google server in the USA, where it is stored and analyzed. The relevant results are then made available to us in anonymized form.

We have activated the IP anonymization feature offered by Google, which removes the last 8 digits (for IPv4) or the last 80 bits (for IPv6) of your IP address. Additionally, Google is certified under the EU–US Privacy Shield agreement, ensuring an adequate level of data protection for processing data in the USA.

**Opt-out**: You can download and install a browser plugin to disable Google Analytics cookies. The plugin is available at <u>tools.google.com</u>.

# Google AdWords (Advertising/Business Cookies)

Our websites and applications utilize Google AdWords to advertise our products and services online. AdWords displays ads on other websites you visit, based on your interactions with our websites and applications. To achieve this, cookies are placed on your device. These cookies do not allow us to identify you personally or access your device.

For more information about Google's privacy policy, please visit: policies.google.com.

**Opt-out**: To opt out of these cookies, visit <u>myadcenter.google.com</u> and follow the provided instructions.

# Hotjar (Functional Cookies)

Our websites and applications use Hotjar, a service provided by Hotjar Ltd., to better understand your needs and optimize the services we offer. This service allows us to analyze, for example, the time spent on specific pages, clicked links, actions taken, and elements of the page that may cause difficulties. Hotjar uses cookies and other technologies to collect data on your behavior and device, including your IP address (stored in anonymized form), screen size, device type, browser information, geographic location (limited to the country), and preferred language for displaying the website.

Hotjar creates pseudonymized user profiles. Neither Hotjar nor we use this information to identify you personally or link it with other personal data.<u>The</u> <u>Guardian+7rzsoftware.com+7Reuters+7</u>

**Opt-out**: You can opt out of these cookies by visiting <u>https://www.hotjar.com/policies/do-not-track/</u> and following the instructions.

# Google DoubleClick (Advertising/Business Cookies)

Our websites use Google DoubleClick—a tool that enables control over the frequency of ad displays, their timing, and the period during which they may appear in your browser. This helps us assess the effectiveness of our advertising campaigns.

**Opt-out**: To opt out of these cookies, visit <u>https://myadcenter.google.com</u> and follow the instructions.

# Information on Cookies in Web Browsers

Detailed information on managing cookies in various web browsers can be found at the following links:

- Microsoft Edge: <a href="mailto:support.microsoft.com">support.microsoft.com</a>
- Mozilla Firefox: <u>support.mozilla.org</u>
- Google Chrome: <a href="mailto:support.google.com">support.google.com</a>
- Opera: <u>help.opera.com</u>

# **Disabling Cookies on Mobile Devices**

To disable cookies on mobile devices, depending on your operating system, please refer to the following links and follow the instructions:

• Android (Google): <a href="support.google.com">support.google.com</a>

• iOS (Apple): <u>support.apple.com</u>

## Impact of Restricting or Disabling Cookies

Please note that restricting or disabling the use of cookies and similar technologies may affect certain functionalities available on our websites.

## **Additional Information**

Additional information about cookies and other technologies can be found at:

- <u>wszystkoociasteczkach.pl</u>
- youronlinechoices.com
- Or in the Help section of your web browser's menu.

For further information, you can also contact us directly or reach out to our Data Protection Officer.

## **Changes to the Privacy and Cookies Policy**

We reserve the right to change and update this Privacy and Cookies Policy. We will promptly inform users of our websites about any changes. If you continue to use our websites after changes have been made, you accept the revised terms. In the case of significant changes, we may provide more explicit notifications or obtain consent as required by law.

Effective Date of this Privacy and Cookies Policy: April 24, 2025

Annex 1

Account & Data Deletion Policy

# **Account & Data Deletion Policy**

Effective: July 7, 2025

## 1. Introduction

GM Planner respects your right to control your personal data. If you hold a user account, you may permanently delete your account and all related data. This policy explains how to do so, what will be removed or retained, and the expected timeline.

## 2. In-App & Web-Based Deletion Options

In compliance with Google Play's User Data policy and the App Privacy Details requirements of the App Store, we offer two account deletion pathways:

## • In-App Deletion

- Navigate to Settings  $\rightarrow$  Account  $\rightarrow$  Delete Account within the GM Planner app.
- Confirm to initiate deletion.
- You will receive an email confirming your account deletion.
- Web-Based Deletion Request
  - Intended for users who've uninstalled the app.
  - Contact customer service at customer@gmplanner.com to request account deletion.
  - Deletion Policy URL: https://gmplanner.com/cookies.pdf

## 3. Subscriptions and Account Deletion

All active subscriptions at the time of account deletion are subject to the terms outlined in the User Agreement. Users are responsible for managing and canceling their subscriptions through the appropriate platform (Google Play / App Store) prior to initiating deletion, as deleting the account does not automatically cancel third-party subscription billing.

## 4. Types of Data Affected

Permanently Deleted:

• Account credentials, tokens, authentication data

- User profile (name, email, photo, preferences)
- Workout history, plans, progress, logs
- Analytics and app usage data linked to your account

## 5. Deletion Timeline

- 24–72 hours: Deletion request acknowledged and account deactivated
- Within 30 days: Full data purge, excluding legally retained items