

Privacy Policy

Hello!

If you found your way here, it's a sure sign that you value your privacy.

We get it! That's why we've created this document outlining all the guidelines for processing personal data and using cookies along with other similar technologies related to the functioning of our website, www.rebels.software and www.concierge.rebels.software its associated social media profiles and when using our Service - Concierge.

You have the right to access your personal data, correct it, delete it or restrict its processing, object to processing, and the right to data portability. Additionally, you can file a complaint with the President of the Personal Data Protection Office.

You can find detailed information about how we handle your personal data in the later sections of the Privacy Policy.

If you have any doubts related to our Privacy Policy, you can contact us at any time by sending a message to hello@rebels.software.

#1: Who is the administrator?

The administrator of your personal data is **Rebels Software Sp. z o.o.**, located at Legnicka 55F, Wrocław (54-203). We are registered in the Register of Entrepreneurs of the National Court Register, maintained by the District Court for Wrocław – Fabryczna, VI Economic Division, under KRS number 0000902712, with REGON number 389070542 and NIP 8943168496. In our Privacy Policy, terms like "we" and "our" refer to Rebels Software Sp. z o.o.

For the purpose of Concierge, we use tools provided by third-party service providers - in particular the [Stripe.com](https://stripe.com) service. Such a provider may become a separate controller of personal data to facilitate transactions and fulfill its own duties. Please review the privacy policy available at <https://stripe.com/en-pl/privacy>. Notice that most of Stripe's service providers are based in the European Union, the United States of America, and India.

2: Who can you contact regarding personal data processing?

We chose not to appoint a Data Protection Officer because it's not required in our case. For any questions or concerns about personal data protection and privacy, you can contact us at hello@rebels.software or via the postal address provided above.

3: For what purposes do we process personal data?

Attachment no. 1 to this Privacy Policy details the specific categories of personal data and their processing purposes.

#4: What information do we have about you?

We may process various data depending on the purpose, which is necessary to achieve specific goals.

This may include information such as:

- name and surname

- email address
- IP address
- data collected in the mailing system
- information visible on social media profiles
- information contained in correspondence

In addition, we process the following data when you use the Concierge::

- company name
- credit/debit card details
- tax identification number
- voice and image

5: What is "Anonymous Information"?

We use tools that collect a range of information about your use of our site, specifically:

- information about the operating system and web browser
- viewed subpages
- time spent on the site
- transitions between subpages
- clicks on specific links
- page scrolls
- source of your visit
- age range
- your gender
- your approximate location limited to the city
- your interests or other preferences based on online activities

This information is referred to as "Anonymous Information" throughout our Privacy Policy.

We don't consider Anonymous Information to be personal data because it doesn't enable us to identify you and isn't associated with the personal data we collect about you. However, due to the strict interpretations by the Court of Justice of the European Union and varying legal opinions, we've included detailed explanations about the processing of this information in our Privacy Policy as a precaution.

We're unable to grant you access to Anonymous Information pertaining to you because we cannot link any of this information to a specific user. The tools used to collect Anonymous Information provide us solely with aggregate statistics and data that is not associated with individual users.

Processing Anonymous Information allows us to provide you with the functionalities available on the site. Additionally, Anonymous Information is used for analytical, statistical, and marketing purposes, such as setting and targeting ads.

Tool providers also process Anonymous Information according to their own terms and privacy policies. They may utilize the information in order to offer, enhance and create services, administer them, gauge advertising effectiveness, safeguard against fraud and misuse, and tailor content and advertisements across various services, websites, and applications. More detailed information regarding this can be found in the dedicated section outlining the tools we utilize.

6: Where do we get your information from?

In most cases, you provide it to us. For example, this happens when you:

- contact us

- use certain functionalities available on our website or external services (e.g., social media)
- follow our social media profiles and/or engage with our posts
- use our Service - Concierge

Certain information about you may be automatically gathered through the tools we use. More comprehensive details regarding these external tools can be found in the Attachment of our Privacy Policy.

7: Is the data secure?

We take the security of your personal data seriously. We have analyzed the risks associated with various data processing processes and implemented appropriate security measures and personal data protection. We continuously monitor the state of our technical infrastructure, train our personnel, review procedures, and implement necessary improvements. For any questions regarding your personal data, please contact us at hello@rebels.software.

8: How long will we keep your personal data?

We store your personal data for as long as it is necessary to fulfill the specific processing purpose. Therefore, the duration of processing varies depending on the purpose. You can find detailed information about this in Attachment no. 1 of our Privacy Policy.

Remember, the end of processing your data for one purpose does not necessarily lead to complete deletion or destruction of your data, as the same set of data may be processed for another purpose for the period indicated for it. Complete deletion or destruction of data occurs when all purposes have been achieved or in other cases specified in the GDPR (General Data Protection Regulation) specified by the European Union.

9: Who receives personal data?

We believe that in today's business landscape, leveraging third-party services is essential. We rely on various services, some of which involve the processing of your personal data. Below is a list of the external service providers involved in processing your personal data.

Data Processor	Purpose of Collaboration with the Data Controller
Hosting provider	Storing data on the server
Cloud service provider	Google services
Provider of online communication tools	Online meetings
Stripe Technology Europe, Limited (Ireland)	Payments, analytics, other business services, account creation, subscription management

If necessary, your data may be made available to a legal advisor or attorney bound by professional secrecy. This need may arise from the necessity to use legal assistance requiring access to your personal data.

Your personal data may also be transferred to tax authorities to the extent necessary for fulfilling tax and accounting obligations, particularly declarations, reports, statements, and other accounting documents containing your personal data.

Additionally, if required, your personal data may be disclosed to entities, bodies, or institutions authorized to access such data under the law, such as police services, security agencies, courts, and prosecutors.

The tool providers responsible for Anonymous Information collection have access to it. These providers function as independent data controllers for the data they collect and may distribute it in accordance with their own terms and privacy policies, over which we have no control. The list of external tools can be found in **Attachment no. 2** of the Privacy Policy. The list does not exclude our right to use additional services provided by other providers.

10: Do we transfer data to third countries or international organizations?

Yes, some of your personal data processing operations may involve transferring data to third countries.

We transfer your personal data to third countries as part of our use of tools that utilize resources located in these countries, especially the USA. When cooperating with the service providers that process personal data in the United States, we verify whether they have completed the self-certification process under the Data Privacy Framework. Moreover, the providers of these or other tools guarantee an adequate level of personal data protection by implementing suitable compliance mechanisms as stipulated by the GDPR, notably through the utilization of standard contractual clauses. Data may also be transferred to countries for which the European Commission has issued a decision on an adequate level of data protection.

Your personal data is currently transferred to third countries as part of our utilization of the following solutions:

- Hosting services
- Payments, analytics, other business services, account creation, subscription management - via Stripe.com (Concierge)
- Providers of services enabling electronic communication, including online meetings (e.g. Concierge)

Furthermore, the Anonymous Information collected through the tools listed in the Attachment to our Privacy Policy may also be transferred to third countries, notably the USA. Providers of these tools typically utilize servers located globally, primarily in the United States (USA), for storing the collected data.

11: Do we use profiling?

We do not base decisions about you solely on automated processing, including profiling, that could have legal effects or similarly significant impacts on you. While we utilize tools that may involve specific actions based on the information collected through tracking mechanisms, we believe these actions do not significantly affect you. They do not differentiate your status as a customer or influence the contract terms you can negotiate, etc.

Using certain tools, we may, for example, direct personalized ads to you based on previous actions taken on a given site or suggest products that may interest you. This is called behavioral advertising. We encourage you to learn more about behavioral advertising, particularly regarding privacy issues. Detailed information, along with the possibility of managing behavioral advertising settings, can be found [here](#).

We want to emphasize that the tools we use only grant us access to anonymous information. This data is stored on the servers of the tool providers, which are typically situated in various locations around the world.

12: What are your rights?

GDPR grants you the following potential rights related to the processing of your personal data:

- the right to access your data and receive a copy of it
- the right to rectify (correct) your data
- the right to delete data (if you believe we have no grounds to process your data, you can request that we delete it)
- the right to restrict data processing (you can request that we limit processing only to data storage or performing actions agreed with you if you believe we have incorrect data or are processing it without justification)
- the right to object to data processing (you have the right to object to data processing based on a legitimate interest; you should indicate a specific situation that, in your opinion, justifies the cessation of processing covered by the objection; we will stop processing your data for these purposes unless we demonstrate that there are compelling legitimate grounds for processing that override your rights, or that your data is necessary for establishing, pursuing, or defending claims)
- right to data portability (you have the right to receive your personal data that you have provided based on a contract or your consent in a structured, commonly used, machine-readable format; you may instruct us to transmit this data directly to another party);
- right to withdraw consent for the processing of personal data, if you have previously given such consent
- right to lodge a complaint with the supervisory authority (if you believe that we are processing data unlawfully, you may file a complaint with the President of the Personal Data Protection Office or another competent supervisory authority).

The procedures for exercising the rights mentioned above are outlined in Articles 16–21 of the GDPR. We recommend reviewing these regulations. It's important to note that these rights are not absolute and may not apply to all instances of processing your personal data.

One of the rights from above is always available to you: if you believe we've breached data protection laws while handling your personal data, you can file a complaint with the supervisory authority (President of the Personal Data Protection Office).

#13: Do we use cookies or other similar technologies, and what does it involve?

Our website, like almost all other websites, uses cookies and other similar technologies, such as tracking codes or pixels, conversion APIs, etc.

These technologies collect specific information used for various purposes, from ensuring the proper functioning of individual site features to analyzing user behavior on the site and directing targeted advertising.

If you want to learn more about cookies and other similar technologies, you can read materials such as:

- [What are HTTP cookies?](#)
- [What are tracking pixels?](#)
- [What are conversions API?](#)

#14: On what basis do we use cookies or other similar technologies?

We use cookies or similar technologies based on your consent, except when they are necessary for essential service functions.

Cookies or other similar technologies that are not necessary for the proper functioning of certain services, remain blocked until you give your consent to use them. During your first visit to our site, you will see a message asking for your consent along with the option to manage cookies or other similar technologies, i.e., to decide which cookies or other similar technologies you agree to and which ones you want to block.

15: Can you disable cookies or other similar technologies?

Yes, you can manage cookie settings or other similar technologies within your web browser. You can block all or selected cookies or other similar technologies. You can also delete previously stored cookies and other website data at any time.

Internet browsers also offer the option of using incognito mode, also referred to as private browsing. You can use it if you don't want information about visited sites and downloaded files to be saved in browsing and download history. Cookies created in incognito are deleted when all windows of this mode are closed.

Browser plugins are also available to control cookies or similar technologies, such as Ghostery. Control over cookies or similar technologies may also be provided by additional software, especially antivirus packages, etc.

Additionally, other tools are also available on the Internet for controlling certain types of cookies or other technologies, particularly for collectively managing behavioral advertising settings.

We also provide you with the option to control selected cookies or other similar technologies directly from our website. We have implemented a privacy mechanism that allows you to block selected cookies or other technologies that you do not wish to use. Please note that disabling or limiting cookie support or other technologies may prevent or limit the usage of some of the features available on our site. For example, if you block cookies or technologies related to social media plugins, buttons, widgets, or social media features implemented on our sites may be unavailable to you.

16: For what purposes do we use cookies or other similar technologies?

Cookies or other similar technologies are used to ensure the proper function of various mechanisms on our sites, such as the correct submission of forms visible on the pages, embedding video or audio players, and social media plugins.

Additionally, cookies or other similar technologies are used for conducting statistical, analytical, and marketing activities.

Cookies also store information about the cookie settings you have defined through the privacy mechanism on our site.

Some cookies or other similar technologies are associated with external tools we use, and the providers of these tools may access information collected through these cookies or similar technologies. Details about external tools are available in the Attachment to the Privacy Policy.

17: What external tools do we use?

A list of tools that require the use of cookies or other similar technologies, along with a detailed description of these tools, can be found in the Attachment to the Privacy Policy.

18: Do we track your activities on the site?

Yes, we utilize external tools that involve collecting information about your activities on our sites. These tools are detailed in the Attachment to the Privacy Policy.

19: Do we target you with personalized advertisements?

No.

20: How can you manage your privacy?

The answer to this question can be found in various sections of this Privacy Policy when describing individual tools, behavioral advertising, etc. Nevertheless, for your convenience, we have gathered this information again in one place. Below is a list of privacy management options:

- privacy settings within your web browser
- browser plugins supporting privacy management, e.g., ghostery
- additional privacy management software
- incognito / private mode in your web browser
- behavioral advertising settings, e.g., youronlinechoices.com

21: Is there anything else you should know?

As you can probably see, the topic of personal data processing, the use of cookies, and overall privacy management is quite complex. We have made every effort to provide you with as much knowledge as possible on matters important to you. If anything is unclear to you, if you want to learn more, or simply discuss your privacy, feel free to reach out to us at hello@rebels.software.

22: Can our Privacy Policy change?

Yes, we may modify this Privacy Policy, especially due to technological changes and changes in legal regulations. All archived versions of the Privacy Policy are linked below.

Privacy Policy effective from 01.06.2024.

[\(PDF\) Privacy Policy www.rebels.software with attachments.](#)

Attachment No. 1 - Purposes of Personal Data Processing

Processing Purpose	Description of Purpose	Legal Basis	Data Retention Period
Contact and Correspondence Management	When you reach out to us through available communication channels, such as email or social media messengers, you naturally share your personal data included in the correspondence. Providing this data is necessary to establish contact.	Article 6(1)(f) GDPR	For the duration of our contact

	<p>Additionally, our communication system records the IP address you used when sending the message.</p> <p>The data is processed to facilitate communication, which is our legitimate interest. After the communication ends, the data is archived to potentially establish, pursue, or defend claims related to the communication.</p>		
Social Media Management	<p>If you follow our social media profiles or interact with our content on social media, we naturally see your publicly available profile data. We process this data solely within the specific social media platform and only for managing that platform, which is our legitimate interest.</p> <p>If you contact us via private message, you naturally provide us with personal data contained in the correspondence, such as your name and profile picture. In this case, your data is processed to communicate with you, and the legal basis is our legitimate interest.</p> <p>We might initiate contact with you via social media to offer collaboration. In such instances, your data will be processed to seek potential partners, offer and establish collaborations, which is our legitimate interest.</p> <p>Messages sent to us via social media are automatically archived using the tools available on each platform and are accessible to us until you delete them. You can access all exchanged messages in the private messages section.</p> <p>Your use of social media platforms is governed by the terms and privacy policies of the platform administrators, who provide services to you independently of us.</p>	Article 6(1)(f) GDPR	For as long as the information is available on the social media platform
Analysis and Statistics	<p>We conduct analysis and compile statistics using tools provided by external suppliers. Through these tools, we only have access to Anonymous Information. Processing this information is based on our legitimate interest in creating, reviewing, and analyzing user activity statistics on the site to optimize our activities.</p> <p>We only access a set of statistics and information that is not attributed to specific individuals.</p> <p>Detailed information about external suppliers' tools can be found in the section dedicated to the tools we use.</p>	Article 6(1)(f) GDPR	Until the information is no longer useful or an objection to processing is raised
Marketing	<p>We conduct marketing activities using tools provided by external suppliers. Within these tools, we only have access to Anonymous Information. Processing this information is based on our legitimate interest in conducting marketing activities, including targeting ads within external systems to market our products and services. We only access a set of statistics and information that is not attributed to specific individuals.</p> <p>Detailed information about external suppliers' tools can be found in the section dedicated to the tools we use.</p>	Article 6(1)(f) GDPR	Until the information is no longer useful or an objection to processing is raised
Offering Additional Features Using Only Anonymous Information	<p>We may embed video or audio players, social media widgets, comment modules, or other tools provided by third parties on our websites. These tools process only Anonymous Information. Processing this information is based on our legitimate interest in providing additional features on the site. We do not access any other information through these tools, nor do we need it – Anonymous Information is processed solely to enable the operation of additional features.</p> <p>Detailed information about external suppliers' tools can be found in the section dedicated to the tools we use.</p>	Article 6(1)(f) GDPR	Until the information is no longer useful or an objection to processing is raised

Compliance with Personal Data Protection Obligations	As a data administrator, we are required to fulfill obligations related to personal data protection. Thus, we may process your personal data if it is necessary to fulfill these obligations (e.g., in response to your request regarding your personal data). The scope of data depends on what is needed to fulfill the obligation and demonstrate GDPR compliance. In this case, we also rely on our legitimate interest in securing necessary data to demonstrate accountability.	Article 6(1)(c) GDPR, Article 6(1)(f) GDPR	Until the expiration of the limitation period for our liability as a data administrator
Defense, Establishment, or Pursuit of Claims	Using our website, as well as entering into an agreement with us, may give rise to certain claims in the future on either our side or yours. Therefore, we are entitled to process personal data for the purpose of defense, establishment, or pursuit of claims. For this purpose, we may process any personal data related to a given claim, so the scope of data may vary depending on what the claim pertains to. In this context, we rely on our legitimate interest in protecting our interests.	Article 6(1)(f) GDPR	Until the claims are time-barred
Concierge - conclusion and performance of the contract	We process your personal data to conclude and perform the service agreement in accordance with the terms of service available at [...]	Article 6(b) GDPR	For the duration of the agreement
Concierge - tax accounting	We process your personal data due to tax law obligations related to the issuance and storage of accounting documentation	Article 6(c) GDPR	For the duration of the obligation to retain accounting documentation as required under Polish tax regulations
Concierge - pursuit and defence against claims	We process your personal data to enable the establishment, exercise and defence of legal claims that may arise from the conclusion and performance of the service agreement - which is our legitimate interest	Article 6(f) GDPR	Until the expiry of the limitation period for claims arising from the contract, in accordance with the time limits set out in the Polish Civil Code

Attachment No. 2 - List of External Tools

External Tool	Description of Functionality and Cookie Usage
Google Tag Manager	We use Google Tag Manager provided by the American company Google LLC, which is used for managing tags and loading scripts within the website. Google Tag Manager itself does not collect any information other than that necessary for its proper operation, but it is responsible for loading other scripts described below.
Google Analytics	<p>We use Google Analytics provided by the American company Google LLC. To use Google Analytics, a special tracking code for Google Analytics has been implemented in the website code. The tracking code uses cookies related to the Google Analytics service. At any time, you can block the Google Analytics tracking code by installing an add-on to your browser provided by Google.</p> <p>Google Analytics automatically collects information about your activity on our website. Within Google Analytics, we only have access to Anonymous Information. With the information collected in this way, we can conduct analyses of user behavior on our website and compile related statistics, and then draw conclusions from this data to design solutions that improve the effectiveness of the website.</p> <p>If you are interested in details related to Google's use of data from websites and applications using Google services, we encourage you to familiarize yourself with this information.</p>
Google Ads	<p>We use remarketing features available within the Google advertising system provided by the American company Google LLC. When visiting our website, a Google remarketing cookie file is automatically left on your device, which collects information about your activity on our website.</p> <p>With the information collected in this way, we are able to display ads to you within the Google network based on your behavior on our website.</p> <p>For example, if you view a product, this fact will be noted by the remarketing cookie file, allowing us to show you an ad related to that product or any other ad we deem appropriate.</p> <p>This advertisement will be displayed to you within the Google network while you are using the Internet, browsing other websites, etc. We emphasize that by using Google Ads, we only use Anonymous Information.</p> <p>By using Google Ads, we are only able to define groups of audiences to which we would like our ads to reach. Based on this, Google decides when and how to present our ad to you.</p> <p>If you do not want to receive personalized ads, you can manage ad settings directly on Google's website: https://adssettings.google.com/. If you are interested in details related to Google's use of data from websites and applications using Google services, we encourage you to familiarize yourself with this information.</p>
YouTube	<p>Widgets from YouTube are embedded on our pages, allowing you to play recordings available on the YouTube service directly from our pages. The YouTube service is operated by the American company Google LLC.</p> <p>When you play a recording, YouTube saves cookie files on your device, including DoubleClick cookie files, and receives information that you played the recording from a specific website, even if you do not have a Google account or are not logged in at the time. If you are logged into your Google account, this service provider will be able to directly associate your visit to our site with your account.</p> <p>The purpose and scope of data collection and further processing and use of data by Google, as well as the possibility of contact, your rights in this regard, and the possibility of making settings to ensure the protection of your privacy, are described in the Google Privacy Policy.</p> <p>If you do not want Google to associate data collected during video playback directly with your profile, you must log out of your account before playing the video. You can also completely prevent plugins from loading on the site by using appropriate extensions for your browser, such as script blocking.</p> <p>Information collected through cookie files related to videos embedded on our pages from the YouTube service is used by Google to ensure the proper and secure functioning of the widget, analysis and optimization of services provided by YouTube, as well as for</p>

	<p>personalization and advertising purposes. We do not have access to this information. It is important for us that the player works correctly.</p> <p>Remember that by playing recordings available on the YouTube service on our pages, you are using services provided electronically by Google LLC. Google LLC is an independent entity providing services electronically on your behalf. Details regarding the terms of use of YouTube, including privacy protection, can be found in documents provided directly by YouTube: terms of service and privacy policy.</p>
Vimeo	<p>Widgets from Vimeo are embedded on our pages, allowing you to play recordings available on our pages. Vimeo is operated by the American company Vimeo.com Inc.</p> <p>When you play a recording, Vimeo saves cookie files on your device and receives information that you played the recording from a specific website. The purpose and scope of data collection and further processing and use of data by Vimeo, as well as the possibility of contact, your rights in this regard, and the possibility of making settings to ensure the protection of your privacy, are described in the Vimeo Privacy Policy.</p> <p>Information collected through cookie files related to videos embedded on our pages from the Vimeo service is used by Vimeo to ensure the proper and secure functioning of the widget, analysis and optimization of services provided by Vimeo, as well as for personalization and advertising purposes. We do not have access to this information. It is important for us that the player works correctly.</p> <p>Remember that by playing recordings available on our pages, you are using services provided electronically by Vimeo. Vimeo is an independent entity providing services electronically on your behalf. Details regarding the terms of use of Vimeo, including privacy protection, can be found in documents provided directly by Vimeo: terms of service and privacy policy.</p>
Facebook Connect	<p>Our website uses plugins, buttons, and other social tools, collectively referred to as "plugins," related to social media services managed by the American company Meta Platforms Inc.</p> <p>Thanks to this, you have the opportunity to use selected social functions on our pages, e.g., like button, share, etc.</p> <p>Plugins collect information about your activity on our website. We do not have access to this information. It is important for us that the plugins work correctly.</p> <p>Information collected by plugins may be used by Meta Platforms Inc. for its own purposes, such as improving its own products, creating user profiles, analyzing and optimizing its own activities, targeting advertisements, over which we have no real influence. Details in this regard can be found in the Meta Privacy Policy.</p>
Stripe (Stripe Technology Europe, Limited (Ireland))	<p>We use Stripe for payments, analytics, and other business services. Stripe may collect personal data including via cookies and similar technologies. The personal data Stripe collects may include transactional data and identifying information about devices that connect to its services. Stripe uses this information to operate and improve the services it provides to us, including for fraud and prevention and detection, authentication, analytics related to the performance of its services, and to enhance and customize the user experience.</p> <p>You can learn more about Stripe and read its privacy policy at https://stripe.com/privacy</p>