

PRIVACY POLICY

This Privacy Policy (hereinafter: "**Policy**") contains information on the processing of your personal data in connection with the use of the Lula.Cleaning, operating at the Internet address <https://app.lula.cleaning/> (hereinafter: "**Application**").

Any capitalized terms not otherwise defined in the Policy shall have the meaning given to them in the Terms and Conditions, available at: <https://lula.cleaning/pl/terms-and-conditions/>.

Personal data Controller

The Controller of your personal data is Lula Solutions sp. z o.o. company, with its registered office in Lublin, (registered office address: ul. Kowalska 5/203 20-115 Lublin), entered into the register of entrepreneurs of the National Court Register kept by the District Court Lublin-West in Lublin adres: ul. Boczna Lubomelskiej 13, 20-070 Lublin, Commercial Division of the National Court Register under KRS number: 0000977968, with a NIP number: (tax ID): 7011093598, REGON number: (statistical no.): 522355756, having a share capital of 5000 PLN (five thousand złotych) paid in full (hereinafter: "**Controller**").

Contact with the Controller

In all matters related to the processing of personal data, you can contact the Controller via:

- a) email – at: support A T lula . cleaning;
- b) postal correspondence – at: ul. Kowalska 5/203 20-115 Lublin;
- c) telephone – at: +48 604 99 86 22.

Personal data protection measures

The Controller applies modern organisational and technical safeguards to ensure the best possible protection of your personal data and guarantees that it processes them in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter: "**GDPR**"), the Act of 10 May 2018 on the Protection of Personal Data and Other Personal Data Protection Regulations.

Information on the personal data processed

The use of the Application requires the processing of your personal data. Below you will find detailed information about the purposes and legal grounds of processing, as well as the period of processing and the obligation or voluntariness to provide them.

Purpose of processing	Personal data processed	Legal basis
Conclusion and performance of the Landlord/Cleaning Company Account Service Agreement.	1) Email address; 2) first name; 3) phone number; 4) company name.	Art. 6(1)(b) GDPR (processing is necessary for the performance of the Landlord/Cleaning Company Account Service Agreement concluded with the data subject, or to take steps at the

		<p>request of the data subject prior to entering into such agreement). Providing the above personal data is a condition for concluding and performing the Landlord/Cleaning Company Account Service Agreement (providing them is voluntary, but the consequence of not providing them will be the inability to conclude and perform the Agreement).</p> <p>The Controller will process the above personal data until the limitation periods for claims arising from the Landlord/Cleaning Company Account Service Agreement expire.</p>
<p>Providing the above-mentioned personal data is a condition for concluding and performing the agreement for the provision of the Account Service (their provision is voluntary, but the consequence of failure to provide them will be the inability to conclude and perform the above-mentioned agreement, including the creation of the Account).</p> <p>The Controller will process the above-mentioned personal data until the statute of limitations for claims under the Account Service Agreement expires.</p>		

Purpose of processing	Personal data processed	Legal basis
Conclusion and performance of the Platform Service Agreement.	<ol style="list-style-type: none"> 1) name and surname 2) E-mail address 3) telephone number 4) company name 5) company NIP (if the Service Recipient is an Entrepreneur or an Entrepreneur with Consumer rights) 6) registered office/business/billing address. 7) REGON 	<p>Art. 6(1)(b) GDPR (processing is necessary for the performance of the Platform Service Agreement concluded with the data subject, or to take steps at the request of the data subject prior to entering into such agreement). Providing the above personal data is a condition for concluding and performing the Platform Service Agreement (providing them is voluntary, but the consequence of not providing them will be the inability to conclude and perform the Agreement).</p> <p>The Controller will process the above personal data until the limitation periods for claims arising from the Platform Service Agreement expire</p>

Providing the above-mentioned personal data is a condition for concluding and performing the Application Use Agreement (providing them is voluntary, but the consequence of failure to provide them will be the inability to conclude and perform the Application Use Agreement).

The Controller will process the above-mentioned personal data until the statute of limitations for claims arising from the Application Use Agreement expires.

Purpose of processing	Personal data processed	Legal basis
Conclusion and performance of the Agreement for the provision of the Newsletter or other Digital Content	<ol style="list-style-type: none"> 1. E-mail address 2. first name; 3. surname; 4. company; 5. phone number. 	<p>Article 6(1)(b) of the GDPR</p> <p>(processing is necessary for the performance of the Contract for the provision of the Newsletter or Digital Content concluded with the data subject or to take steps to conclude it)</p> <p>and</p> <p>Article 6(1)(f) of the GDPR</p> <p>(processing is necessary for the purpose of the legitimate interest of the Controller, in this case informing about new products and promotions available in the Application)</p>

Providing the above-mentioned personal data is voluntary, but necessary in order to receive the Newsletter or Digital Content (the consequence of not providing them will be the inability to receive the Newsletter or Digital Content).

The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of the processing is achieved, or until the claims arising from the Contract for the provision of the Newsletter or Digital Content expire (whichever occurs first).

Purpose of processing	Personal data processed	Legal basis
Handling queries submitted by Users	<ol style="list-style-type: none"> 1) name 2) E-mail address 1) other data contained in the message to the Controller 	<p>Article 6(1)(f) of the GDPR</p> <p>(processing is necessary for the purpose of pursuing the legitimate interest of the Controller, in this case responding to the inquiry received)</p>
<p>Providing the above-mentioned personal data is voluntary, but necessary in order to receive a response to the inquiry (the consequence of failure to provide them will be the inability to receive an answer).</p>		

The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of processing is achieved (whichever occurs first).

Purpose of processing	Personal data processed	Legal basis
Sending email notifications.	1) email address	<p>Art. 6(1)(f) GDPR (processing is necessary for the purposes of the Controller's legitimate interests, namely informing Users about actions taken in connection with the provision of services).</p> <p>Providing the above personal data is voluntary but necessary to receive information on actions related to the provision of services (the consequence of not providing them will be the inability to receive such information).</p> <p>The Controller will process the above personal data until an effective objection is lodged or the purpose of processing is achieved.</p>
<p>Providing the above-mentioned personal data is voluntary, but necessary in order to receive a response to the inquiry (the consequence of failure to provide them will be the inability to receive an answer).</p> <p>The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of processing is achieved (whichever occurs first).</p>		

Purpose of processing	Personal data processed	Legal basis
Fulfilling tax obligations (m.in. issuing a VAT invoice, storing accounting documentation)	1) Name and surname/company 2) address of residence/registered office 3) TIN/NIP/TAX ID	<p>Art. 6(1)(c) GDPR (processing is necessary for compliance with a legal obligation to which the Controller is subject, namely obligations under tax law).</p> <p>Providing the above personal data is voluntary but necessary for the Controller to fulfil its tax obligations (the consequence of not providing them will be the inability for the Controller to fulfil such obligations).</p> <p>The Controller will process the above personal data for 5 years from the end of the year in which the deadline for</p>

		payment of tax for the previous year expired.
<p>Providing the above-mentioned personal data is voluntary, but necessary for the Controller to meet its tax obligations (the consequence of failure to provide them will be the Controller's inability to meet the above-mentioned obligations).</p> <p>The Controller will process the above-mentioned personal data for a period of 5 years from the end of the year in which the deadline for payment of tax for the previous year expired.</p>		

Purpose of processing	Personal data processed	Legal basis
Compliance with obligations related to the protection of personal data	1) name and surname 2) contact details provided by you (e-mail address; correspondence address; telephone number)	<p>Art. 6(1)(c) GDPR (processing is necessary for compliance with a legal obligation to which the Controller is subject, namely obligations arising from data protection regulations).</p> <p>Providing the above personal data is voluntary but necessary for the proper performance by the Controller of its obligations arising from data protection laws, including the exercise of your rights under the GDPR (the consequence of not providing the data will be the inability to properly exercise such rights).</p> <p>The Controller will process the above personal data until the expiry of the limitation periods for claims for breach of data protection regulations.</p>
<p>Providing the above-mentioned personal data is voluntary, but necessary for the proper performance by the Controller of the obligations resulting from the provisions on the protection of personal data, m.in. the exercise of the rights granted to you by the GDPR (the consequence of failure to provide the above-mentioned data will be the inability to properly exercise the above-mentioned rights).</p> <p>The Controller will process the above-mentioned personal data until the expiry of the limitation periods for claims for violation of personal data protection regulations.</p>		

Purpose of processing	Personal data processed	Legal basis
Establishing, exercising or	1) Name and surname/company 2) E-mail address	Art. 6(1)(f) GDPR (processing is necessary for the purposes of the Controller's legitimate interests, namely

defending against legal claims	3) address of residence/registered office 4) PESEL number 5) TIN/NIP (tax ID)	the establishment, exercise or defence of claims that may arise in connection with the performance of agreements concluded with the Controller). Providing the above personal data is voluntary but necessary for the establishment, exercise or defence of such claims (the consequence of not providing them will be the inability of the Controller to undertake these actions). The Controller will process the above personal data until the expiry of the limitation periods for claims that may arise in connection with the performance of agreements concluded with the Controller.
<p>Providing the above-mentioned personal data is voluntary, but necessary in order to establish, pursue or defend against claims that may arise in connection with the performance of the Agreements concluded with the Controller (the consequence of failure to provide the above-mentioned data will be the inability of the Controller to take the above-mentioned actions)</p> <p>The Controller will process the above-mentioned personal data until the expiry of the limitation periods for claims that may arise in connection with the performance of the Agreements concluded with the Controller.</p>		

Purpose of processing	Personal data processed	Legal basis
Analysis of your activity in the App	1) Date and time of the visit 2) IP number of the device 3) device operating system type 4) approximate location 5) type of web browser 6) time spent in the App 7) visited subpages and other actions taken within the Application	Article 6(1)(f) of the GDPR (processing is necessary for the purpose of the legitimate interest of the Controller, in this case obtaining information about your activity in the Application)
<p>Providing the above-mentioned personal data is voluntary, but necessary in order for the Controller to obtain information about your activity in the Application (the consequence of failure to provide them will be the Controller's inability to obtain the above-mentioned information).</p> <p>The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of the processing is achieved.</p>		

Purpose of processing	Personal data processed	Legal basis
Application administration	1) IP address 2) server date and time 3) Web browser information 4) Operating System Information The above data are saved automatically in the so-called server logs, each time the Application is used (it would not be possible to administer it without the use of server logs and automatic saving).	Article 6(1)(f) of the GDPR (processing is necessary for the purpose of pursuing the legitimate interest of the Controller, in this case ensuring the proper operation of the Application)
<p>Providing the above-mentioned personal data is voluntary, but necessary to ensure the proper operation of the Application (the consequence of failure to provide them will be the inability to ensure the proper operation of the Application).</p> <p>The Controller will process the above-mentioned personal data until an effective objection is raised or the purpose of the processing is achieved.</p>		

Profiling

In order to create your profile for marketing purposes and direct marketing tailored to your preferences, the Controller will process your personal data in an automated manner, including profiling them – however, this will not have any legal effects on you or significantly affect your situation in a similar way.

The scope of profiled personal data corresponds to the scope indicated above in relation to the analysis of your activity in the Application and the data that you save on the Account.

The legal basis for the processing of personal data for the above purpose is Article 6(1)(f) of the GDPR, according to which the Controller may process personal data in order to pursue its legitimate interest, in this case to conduct marketing activities tailored to the preferences of recipients. Providing the above-mentioned personal data is voluntary, but necessary to achieve the above-mentioned purpose (the consequence of not providing them will be the Controller's inability to conduct marketing activities tailored to the preferences of recipients).

The Controller will process personal data for the purpose of profiling them until an effective objection is raised or the purpose of processing is achieved.

Recipients of personal data

The recipients of personal data will be the following external entities cooperating with the Controller:

- a) The recipients of personal data may include the following external entities cooperating with the Controller:
- b) hosting services provider;

- c) domain provider;
- d) email system provider;
- e) online payment system providers;
- f) Facebook social networking service provider;
- g) Apple service provider;
- h) Microsoft service provider;
- i) Google service provider;
- j) online meeting scheduling provider;
- k) CRM system provider;
- l) webinar system provider;
- m) provider of tools enabling the automatic translation of messages exchanged by Users into other languages;
- n) companies providing tools used to analyse activity on the Platform and to deliver direct marketing to its users (including Google Ads);
- o) accounting office.

In addition, personal data may also be transferred to public or private entities, if such an obligation results from generally applicable law, a final court judgment or a final administrative decision.

Transfer of personal data to a third country

In connection with the Controller's use of the services provided by Google LLC, your personal data may be transferred to the following third countries: Great Britain, Canada, USA, Chile, Brazil, Israel, Saudi Arabia, Qatar, India, China, South Korea, Japan, Singapore, Taiwan (Republic of China), Indonesia and Australia. The basis for the transfer of data to the above-mentioned third countries are:

- in the case of the United Kingdom, Canada, Israel and Japan - a decision of the European Commission stating an adequate level of protection of personal data in each of the above-mentioned third countries;
- for the USA, Chile, Brazil, Saudi Arabia, Qatar, India, China, South Korea, Singapore, Taiwan (Republic of China), Indonesia and Australia, adequacy contractual clauses in line with the standard contractual clauses set out in Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries under Regulation (EU) 2016/679 of the European Parliament and of the Council.

You can obtain from the Controller a copy of the data transferred to a third country.

Permissions

In connection with the processing of personal data, you have the following rights:

- 1) the right to be informed what personal data concerning you is processed by the Controller and to receive a copy of this data (the so-called right of access). Issuing the first copy of the data is free of charge, for subsequent copies the Controller may charge a fee;
- 2) if the processed data becomes outdated or incomplete (or otherwise incorrect), you have the right to request its rectification;
- 3) in certain situations, you can ask the Controller to delete your personal data, e.g. when:
 - a) the data will no longer be needed by the Controller for the purposes of which it has informed;
 - b) you have effectively withdrawn your consent to the processing of data - unless the Controller has the right to process the data on another legal basis;
 - c) the processing is unlawful;
 - d) the need to delete the data results from a legal obligation to which the Controller is subject;
- 4) if personal data is processed by the Controller on the basis of the consent granted to the processing or in order to perform the Agreement concluded with him, you have the right to transfer your data to another Controller;
- 5) if personal data is processed by the Controller on the basis of your consent to the processing, you have the right to withdraw this consent at any time (the withdrawal of consent does not affect the lawfulness of the processing that was carried out on the basis of consent before its withdrawal);
- 6) if you believe that the processed personal data are incorrect, their processing is unlawful, or the Controller no longer needs certain data, you can request that for a specified period of time (e.g. checking the correctness of the data or pursuing claims) the Controller does not perform any operations on the data, but only stores them;
- 7) you have the right to object to the processing of personal data based on the legitimate interest of the Controller. In the event of an effective objection, the Controller will cease to process personal data for the above-mentioned purpose;
- 8) you have the right to lodge a complaint with the President of the Office for Personal Data Protection if you believe that the processing of personal data violates the provisions of the GDPR.

Cookies

1. The Controller informs that the Application uses "cookies" installed on your end device. These are small text files that can be read by the Controller's system, as well as by systems belonging to other entities whose services are used by the Controller (e.g. Facebook, Google).
2. The Controller uses cookies for the following purposes:
 - a) ensuring the proper operation of the Application – thanks to cookies, it is possible for the Application to operate efficiently, use its functions and conveniently move between individual subpages;
 - b) increasing the comfort of using the Application – thanks to cookies, it is possible to detect errors on some subpages and constantly improve them;
 - c) creating statistics – cookies are used to analyse the manner in which the Users of the Application use the Application. This makes it possible to constantly improve the Application and adapt its operation to the preferences of users;
 - d) conducting marketing activities – thanks to cookies, the Controller can direct advertisements to users tailored to their preferences.

3. Controller can place both permanent and temporary (session) files on your device. Session cookies are usually deleted when you close your browser, but closing your browser does not delete persistent cookies.
4. Information about cookies used by the Controller is displayed in the panel located at the bottom of the website/footer of the Application. Depending on your decision, you can enable or disable cookies of particular categories (except for necessary cookies) and change these settings at any time.
5. The data collected by means of cookies do not allow the Controller to identify you.
6. The Controller uses the following cookies or tools using them:

TOOL	SUPPLIER	FUNCTIONS AND SCOPE OF DOWNLOADED DATA	DURATION
Strictly necessary cookies	Controller	The operation of these cookies is necessary for the proper functioning of the Platform's website, therefore you cannot disable them. Thanks to these cookies (which collect, among other things, the IP number of your device), it is possible, among other things, to log in and use the Platform, as well as to collect information about your activity on the Platform, including session replay.	Most of the necessary cookies are session cookies, but some remain on your end device for a period of 2 years or until they are deleted;
Google Analytics	Google	This tool allows registration and logging in using the Google button (if you use this form of logging in).	up to 2 years or until they are removed (whichever occurs first)
Facebook Pixel	Facebook	This tool also allows us to determine that you have opened the App and to target you with advertisements displayed on Facebook and Instagram social networks and measure their effectiveness. This tool allows registration and logging in using the Facebook button (if you use this form of logging in).	Up to 2 years or until they are deleted (whichever occurs first)
Apple	Apple	This tool allows registration and logging in using the Apple button (if you use this form of logging in).	Up to 2 years or until they are deleted (whichever occurs first)

7. Through most commonly used browsers, you can check whether cookies have been installed on your end device, as well as delete installed cookies and block their installation in the future by the Application. However, disabling or limiting the use of cookies may cause quite serious difficulties in using the Application, e.g. in the form of the need to log in on each subpage, longer loading period of the Application, limitations in the use of certain functionalities.

Final provisions

To the extent not regulated by the Policy, the generally applicable provisions on the protection of personal data shall apply.

This Policy has been in force since 1 July 2023.