

* PRIVACY & COOKIE POLICY *

Global Intelligence Sp. z o.o. (GLISAR)

Effective Date: January 1, 2025

Last Updated: January 1, 2025

Version: 1.0

1. COMPANY INFORMATION

Data Controller:

Global Intelligence Sp. z o.o.

Website: <https://glisar.eu>

Email: contact@glisar.eu

Address: Chwaszczyno 80-209, ul. Słowackiego 25, Polska

Jurisdiction: Poland, European Union

This Privacy & Cookie Policy explains how we collect, use, process, and protect your personal information when you visit our website or interact with our services.

2. INFORMATION WE COLLECT

2.1 Information You Provide Directly

- **Contact Forms:** Name, email address, organization, application area, and message content
- **Communication:** Information you provide when contacting us via email or other channels
- **Business Inquiries:** Technical requirements, project details, and organizational information

2.2 Information Collected Automatically

- **Website Analytics:** Via Google Analytics 4, including:
 - Pages visited and time spent on site
 - Geographic location (country/region level)
 - Device and browser information
 - Traffic sources and referral websites

- User interactions with website elements

2.3 Information We Do NOT Collect

- Personal identification numbers or government IDs
- Financial or payment information
- Sensitive personal data (health, political opinions, etc.)
- Detailed location data (GPS coordinates)

3. HOW WE USE YOUR INFORMATION

3.1 Business Purposes

- **Respond to Inquiries:** Process and respond to your requests for information or services
- **Business Development:** Evaluate potential partnerships and technical collaborations
- **Service Improvement:** Analyze website performance and user experience
- **Communication:** Send requested information about our technology and services

3.2 Website Analytics

- **Performance Monitoring:** Track website functionality and identify technical issues
- **User Experience:** Understand how visitors navigate our site to improve usability
- **Business Intelligence:** Analyze visitor patterns to optimize our content and services

3.3 Legal Basis (GDPR)

- **Legitimate Interest:** Website analytics and business communications
- **Consent:** Google Analytics cookies (obtained via cookie banner)
- **Contract Performance:** Processing inquiries for potential business relationships

4. COOKIE POLICY

4.1 What Are Cookies

Cookies are small text files stored on your device when you visit our website. They help us provide a better user experience and analyze website performance.

4.2 Cookies We Use

Essential Cookies (Always Active)

- **Session Management:** Maintain website functionality during your visit
- **Security:** Protect against automated attacks and abuse
- **Preferences:** Remember your cookie consent choices

Analytics Cookies (Requires Consent)

- **Google Analytics 4:** Tracks website usage and performance
 - Cookie Names: `_ga`, `_ga_*`, `_gid`
 - Purpose: Measure website traffic and user behavior
 - Duration: Up to 2 years
 - Data Processed: Anonymized usage statistics

4.3 Cookie Configuration

We configure Google Analytics with privacy-enhanced settings:

- **IP Anonymization:** Enabled
- **Data Sharing:** Disabled
- **Advertising Features:** Disabled
- **User-ID Tracking:** Disabled

4.4 Managing Cookies

- **Cookie Banner:** Choose to accept or decline analytics cookies
- **Browser Settings:** Configure cookie preferences in your browser
- **Opt-Out:** Use Google's opt-out browser add-on
- **Contact Us:** Email us to discuss cookie preferences

5. DATA SHARING AND DISCLOSURE

5.1 Third-Party Services

- **Google Analytics:** Anonymous website usage data (only with your consent)

- **Email Services:** Contact form submissions for business communication
- **Hosting Providers:** Website infrastructure and security services

5.2 We Do NOT Share Data With

- Marketing companies or data brokers
- Social media platforms for advertising
- Government agencies (except when legally required)
- Any party for commercial purposes unrelated to our business

5.3 Legal Disclosure

We may disclose information when required by law, court order, or to protect our legal rights and safety.

6. DATA SECURITY

6.1 Security Measures

- **Encryption:** HTTPS/TLS encryption for all data transmission
- **Access Controls:** Limited access to personal information
- **Regular Updates:** Security patches and system maintenance
- **Monitoring:** Continuous security monitoring and threat detection

6.2 Data Retention

- **Contact Inquiries:** Retained for 3 years for business development purposes
- **Analytics Data:** Retained per Google Analytics settings (26 months maximum)
- **Email Communications:** Retained as long as business relationship exists

7. YOUR RIGHTS (GDPR & CCPA)

7.1 Access and Portability

- **Right to Access:** Request information about data we hold about you
- **Data Portability:** Receive your data in a structured, machine-readable format

7.2 Correction and Deletion

- **Right to Rectification:** Correct inaccurate or incomplete information

- **Right to Erasure:** Request deletion of your personal data
- **Right to Restriction:** Limit how we process your data

7.3 Consent and Objection

- **Withdraw Consent:** Revoke consent for analytics cookies at any time
- **Object to Processing:** Object to processing based on legitimate interests
- **Opt-Out:** Refuse or opt-out of data collection

7.4 Exercising Your Rights

To exercise these rights, contact us at: contact@glisar.eu

We will respond within 30 days and verify your identity before processing requests.

8. INTERNATIONAL DATA TRANSFERS

8.1 Google Analytics

Data may be transferred to Google servers in the United States. Google is certified under:

- **EU-US Data Privacy Framework**
- **Standard Contractual Clauses (SCCs)**
- **Adequate protection mechanisms** as recognized by EU authorities

8.2 Other Transfers

Any international data transfers comply with applicable privacy laws and include appropriate safeguards.

9. CHILDREN'S PRIVACY

Our website and services are not directed to children under 16 years of age. We do not knowingly collect personal information from children. If you believe we have collected information from a child, please contact us immediately.

10. UPDATES TO THIS POLICY

10.1 Policy Changes

We may update this policy to reflect changes in our practices or legal requirements. Significant changes will be communicated via:

- **Website Notice:** Prominent notice on our homepage
- **Email Notification:** To contacts who have provided email addresses
- **Version History:** Document version tracking

10.2 Continued Use

Continued use of our website after policy updates constitutes acceptance of the revised terms.

11. CONTACT INFORMATION

11.1 Privacy Questions

For questions about this policy or your personal data:

Email: contact@glisar.eu

Response Time: Within 48 hours for privacy-related inquiries

Language: English, Polish

11.2 Data Protection Officer

For complex privacy matters or formal complaints:

Email: contact@glisar.eu

Subject Line: "Data Protection Inquiry"

11.3 Supervisory Authority

If you're not satisfied with our response, you may contact:

Polish Data Protection Authority (UODO)

Website: <https://uodo.gov.pl/>

For EU residents: Your local data protection authority

12. LEGAL COMPLIANCE

This policy complies with:

- **EU General Data Protection Regulation (GDPR)**
- **California Consumer Privacy Act (CCPA)**
- **Polish Personal Data Protection Act**
- **ePrivacy Directive (Cookie Law)**

Document Information:

- **Created:** January 2025
- **Language:** English
- **Jurisdiction:** Poland, European Union
- **Applicable Law:** EU GDPR and Polish privacy legislation

For the most current version of this policy, visit: <https://glisar.eu>

This document was prepared by Global Intelligence Sp. z o.o. for compliance with applicable privacy and data protection laws. For legal advice regarding specific situations, consult qualified legal counsel.

