Privacy Policy

of the dotty Website and Application

In force from 2 November 2026 (previous wording from 18 September 2026)

Subject matter of the Privacy Policy

This document fulfils our obligations under the legislation on the protection of personal data, in particular under the GDPR – 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.

This document explains how and on what terms we process your personal data when you visit our website, contact us, conclude an agreement with us or use the dotty Application. Among other things, you will learn:

- why and for what purpose we may process your data;
- whether you are obliged to provide us with your data;
- how long we keep your data;
- who the recipients of your personal data are;
- whether we process your data outside the European Economic Area;
- whether we process your data by automated means, including whether we profile you;
- **how we use cookies.**

This Policy consists of the following Parts:

Part I contains the information that we must provide to **everyone**, regardless of the purpose of data processing.

Part II contains information for persons who use our Website and Application.

Part III contains information for persons who **communicate** with us by e-mail.

Part IV contains information for a **Salon** which concludes the Agreement with us and uses the features of our **Application**, and for **Salon Staff**, i.e. persons to whom the Salon has granted access to its Account.

Part V contains information for persons who are interested in our offer in connection with our **marketing activities**.

Part VI contains the Cookie Policy.

Part VII contains additional information for persons in the United Kingdom.

Part I. General information for everyone

Contact details of the controller of your personal data

The controller of your personal data is DOTTY spółka z ograniczoną odpowiedzialnością with its registered office in Brzeg, ul. Księcia Jerzego II Piasta 11 lok. 3, 49-300 Brzeg, entered in the register of entrepreneurs of the National Court Register (*Krajowy Rejestr Sądowy*) under number KRS 0001262238, NIP 7471938413, REGON 545534722 (hereinafter “dotty”, “we”).

In all matters relating to the processing of personal data you may contact us at rodo@dotty.pl, and in other matters at kontakt@dotty.pl, or in writing at the address of our registered office, as well as by telephone: +48 784 333 904.

Scope of this Policy

This Policy concerns data of which dotty is the controller. It does not concern the data of Salon Clients entered into the Application – in that respect the controller is the Salon, and dotty acts as a processor under a data processing agreement concluded in accordance with Article 28 of the GDPR. **Information on the processing of Salon Clients' data is made available by the Salon in its own privacy policy.** The list of processors to which we entrust Salon Clients' data, acting on the Salon's instructions, is set out in the List of Sub-processors in the data processing agreement, which constitutes Appendix No. 2 to the Terms. Data transferred to the language model provider in connection with the operation of the analysis module are Salon Clients' data; your data as a person representing a Salon or belonging to the Salon Staff are not transferred to the model provider.

Where do we obtain your personal data from?

The personal data that we process come directly from you. This happens when:

- you browse our Website;
- you send us an enquiry, a request for an offer or a question concerning the Application;
- you conclude the Agreement with us and use the Application;
- you use the Application as a person to whom a Salon has granted access to its Account;
- you visit our social media accounts or contact us through them.

We receive Salon Clients' data from the Salon, or they are entered by the Salon Client themselves within their account. In both cases we process them on the Salon's instructions as a processor.

What rights do you have in connection with the processing of personal data?

Below we set out your rights relating to the processing of personal data. The rights available to you in a particular situation depend on the purpose for which and the basis on which we process your data.

Right of access to data. You have the right to obtain information about the data we process about you, including the purposes and legal bases of processing, the scope of the data held, the recipients and the envisaged date of erasure of the data, and to obtain a copy of them.

Right to rectification. You have the right to request the rectification or completion of personal data stored about you without undue delay.

Right to restriction of processing. You may request the restriction of processing if you contest the accuracy of the data, if the processing takes place without a legal basis or if you have objected to the processing.

Right to erasure. You may request the erasure of your data, unless their further processing is necessary, in particular, for compliance with a legal obligation or for the establishment, exercise or defence of legal claims. Erasure of data from production systems does not result in their immediate erasure from backups. Erased data remain in backups until the end of the retention period of those backups and are then deleted together with those backups; during that time they are not used and are restored only where it is necessary to restore data after an incident.

Right to information. If you submit a request for rectification, erasure or restriction of processing, we will notify each recipient of your data of it, unless this proves impossible or involves disproportionate effort.

Right to data portability. You have the right to receive the data you have provided to us in a structured, commonly used and machine-readable format, and to request that they be transmitted to another controller, where technically feasible. This right concerns data processed on the basis of consent or in connection with the performance of a contract.

Right to object. Where we process your data on the basis of our legitimate interest, you have the right to object at any time to further processing on grounds relating to your particular situation. You may object to processing for direct marketing purposes at any time and without giving reasons.

Right to withdraw consent. Where we process your data on the basis of consent, you may withdraw it at any time with effect for the future. This does not affect the lawfulness of processing carried out before its withdrawal.

Right to lodge a complaint. You have the right to lodge a complaint with the President of the Personal Data Protection Office (*Prezes Urzędu Ochrony Danych Osobowych*, ul. Stanisława Moniuszki 1A, 00-014 Warsaw, Poland, https://uodo.gov.pl) or with the supervisory authority in the Member State of your habitual residence, place of work or place of the alleged infringement (Article 77 of the GDPR). If you are in the United Kingdom, you may also lodge a complaint with the Information Commission (Information Commission's Office, ICO); see Part VII. Before exercising this right, we encourage you to contact us so that we can clarify any doubts.

Handling of requests

We respond to a request within one month of its receipt. If it is necessary to extend that period, we will inform you of the reasons. We send the response to the e-mail address from which the request was sent and, in the case of requests sent by post, to the correspondence address indicated.

Cookies

We use cookies on the Website and in the Application. We use strictly necessary cookies, which ensure the operation of the Website and the Application, including session maintenance and authentication, without the need to obtain consent. We do not use analytical or marketing cookies, we do not profile you and we do not track your activity on the Website or in the Application. As we use only strictly necessary cookies, we do not ask for your consent to cookies and we do not display a consent banner.

This also applies to the part of the Application available to Salon Clients; Salons are not able to place their own tracking codes in that part. In addition to cookies, the Application uses browser local storage mechanisms (localStorage and sessionStorage), which serve solely to remember view settings and to store an unsaved draft of the consultation questionnaire for the duration of the browser session. They are necessary for the provision of the service you request and are not used for analytics or marketing.

Detailed information is contained in Part VI of this Policy – the Cookie Policy.

Transfer of data outside the European Economic Area

As a rule, we process data within the European Economic Area. The Application's servers are located in Germany. Data may be transferred outside the EEA in connection with the use of tools provided by Google Ireland Limited – data may be transferred to the United States of America, where the parent company of that entity, i.e. Google LLC, has its registered office, and to other third countries in which that entity or its subcontractors maintain technical infrastructure. The transfer takes place on the basis of Article 45(1) of the GDPR, i.e. Commission Implementing Decision (EU) 2023/1795 of 10 July 2023 on the adequate level of protection of personal data under the EU–US Data Privacy Framework, and, to the extent not covered by that decision, on the basis of Article 46(2)(c) of the GDPR, i.e. standard contractual clauses.

Recipients of data

Your data may be made available to our trusted subcontractors that provide services to us, including providers of IT tools and providers of legal and accounting services, as well as to entities authorised under the provisions of law.

In particular, a recipient of the data may be Hetzner Online GmbH, with its registered office at Industriestr. 25, 91710 Gunzenhausen, Germany, which provides us with hosting and the Application's infrastructure, including the storage of backups.

Our provider of business e-mail, of the transmission of system messages sent from the Application and of services related to the synchronisation of the appointment calendar is also Google Ireland Limited, which has its registered office at Gordon House, Barrow Street, Dublin 4, D04 V4X7. We do not, however, entrust data to the operator of the browser push notification service. That entity only mediates in delivering an encrypted notification to your device, does not receive its content from us and processes the data of its users on its own behalf, on the terms set out in its privacy policy.

Automated decision-making and profiling

We do not take decisions concerning you based solely on automated processing which would produce legal effects concerning you or similarly significantly affect you, within the meaning of Article 22 of the GDPR.

Links to other entities' websites

Where we provide links to other entities' websites, this Policy does not apply. We encourage you to read the privacy policies of those entities.

Changes to the Privacy Policy

This Policy is subject to periodic review and updating. We will inform you of material changes on the Website or by e-mail. This version is in force from 2 November 2026.

Part II. Processing of data in connection with the use of the Website and the Application

Below we present information on the processing of personal data in connection with the use of the Website and the Application. The rules for processing the data of persons who conclude the Agreement with us and use the Salon Account or a Sub-account are described separately in Part IV of this Policy.

For what purpose and on what basis do we process your data?

The legal basis and purpose of processing your personal data are:

- for the purpose of providing services by electronic means, namely making available to you the content collected on our Website – in which case the legal basis for processing is that the processing is necessary for the performance of a contract (Article 6(1)(b) of the GDPR);
- for the purpose of ensuring the proper functioning of the Website and the Application – in which case the basis for processing is Article 6(1)(f) of the GDPR, i.e. our legitimate interest in ensuring the operation of our websites;
- for the purpose of the possible establishment and exercise of legal claims or defence against them, and for the purpose of ensuring the security of your data – the legal basis for processing is our legitimate interest (Article 6(1)(f) of the GDPR) in the protection of our rights.

How long do we process your data?

We will process your personal data for as long as is necessary to achieve the purposes described in this Policy, in particular to perform our contractual and statutory obligations.

Who are the recipients of your personal data?

The recipients of your personal data, i.e. external entities that may participate in the processing of your data, will be our trusted subcontractors – providers of IT services in the field of data hosting, storage of backups and business e-mail services, indicated in Part I of this Policy.

Is providing your data mandatory?

Your personal data – including your IP address, other identifiers and other information – are collected by means of cookies or other similar technologies from the moment you connect to our Website. Providing data is not mandatory; however, restricting cookies may hinder or prevent the use of the Website.

You can read more about how we use cookies and how to change your cookie preferences **in Part VI of this Policy.**

What rights do you have?

Your rights are set out in Part I of this Policy.

Part III. Information for persons who communicate with us directly by e-mail

Below we set out the rules for processing personal data that apply when you contact us directly by e-mail.

For what purpose do we process your data?

We process your personal data in order to respond to your enquiries concerning:

- our Application, its features and methods of payment;
- details of an order or of starting cooperation;
- any other enquiries addressed to us.

On what legal basis do we process your data?

The legal basis for processing your personal data is:

- for the purpose of responding to your enquiry, depending on the type of enquiry – our legitimate interest (Article 6(1)(f) of the GDPR) in providing information about our business, or the necessity of processing for the performance of a contract concluded between us or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) of the GDPR);
- for the purpose of the possible establishment and exercise of legal claims or defence against them, and for the purpose of ensuring the security of your data – our legitimate interest (Article 6(1)(f) of the GDPR) in the protection of our rights.

How long do we process your data?

With regard to data provided in connection with the intention to conclude a contract, we will process your data for the term of the contract, for the limitation period for claims and – with regard to contracts concluded – for the period resulting from the provisions determining the retention period of accounting documents.

Who are the recipients of your personal data?

The recipients of your personal data, i.e. external entities that may participate in the processing of your data, will be our trusted subcontractors – providers of IT services in the field of data hosting, storage of backups and business e-mail services, indicated in Part I of this Policy.

Is providing your data mandatory?

Providing your data is voluntary, although the data indicated as necessary for concluding a contract are mandatory, and failure to provide them may mean that it is impossible to conclude the contract. Providing the other data is optional.

Other relevant information

We use business e-mail provided by Google Ireland Limited; as a result, your data may be transferred outside the European Economic Area on the terms described in Part I of this Policy.

What rights do you have?

Your rights are set out in Part I of this Policy.

Part IV. Information for persons who conclude the Agreement with us and use the Application

This Part concerns persons representing a Salon, natural persons conducting business activity who conclude the Agreement with us, and persons to whom the Salon has granted access to its Account by means of Sub-accounts. As regards the data of Salon Staff, we are the controller of the data used for the technical handling of access to the Application. Other data of Salon Staff, including the data necessary to create a Sub-account and the data contained in the records kept by the Salon in the Application, are processed on the Salon's instruction, as a processor, under the Data Processing Agreement.

For what purpose do we process your data?

We process your personal data in order to enable you to conclude the Agreement with us and subsequently to enable you to use the features of our Application.

On what legal basis do we process your data?

The legal basis for processing your personal data is:

- for the purpose of fulfilling your order for a Subscription to our Services – the necessity of processing for the performance of a contract (Article 6(1)(b) of the GDPR);
- for the purpose of enabling you to create an Account and use it – the necessity of processing for the performance of a contract (Article 6(1)(b) of the GDPR) or the legitimate interest of dotty and of the Salon (Article 6(1)(f) of the GDPR), namely the performance of the Agreement concluded by the Parties;
- for the purpose of fulfilling the statutory obligations incumbent on us as controller, arising in particular from tax and accounting legislation – compliance with our legal obligation (Article 6(1)(c) of the GDPR);
- for the purpose of handling complaints – our legitimate interest in determining whether complaint claims are justified or unjustified (Article 6(1)(f) of the GDPR);
- for the purpose of the possible establishment and exercise of legal claims or defence against them – our legitimate interest (Article 6(1)(f) of the GDPR) in the protection of our rights.

How long do we process your data?

We will process your data for the term of the agreement and, after its performance, for the limitation period for claims, as well as for the period resulting from the legal provisions determining the retention period of accounting documents.

Is providing your data mandatory?

Providing your data is voluntary, although some of the data indicated by us must be provided in order for your order to be accepted and handled, and failure to provide them will result in the order not being fulfilled. Providing the other data is optional.

Who are the recipients of your personal data?

The recipients of your personal data will be our trusted subcontractors – providers of IT services in the field of data hosting, storage of backups and business e-mail services – as well as entities whose activities are ancillary to our business, including banks and payment operators, and entities providing accounting, legal, audit and consulting services.

The recipients of your data will also include companies providing payment handling services, to the extent that you decide to use the methods of payment offered by them. In such a case those companies are separate controllers of personal data and act in accordance with their own privacy policies.

Our payment provider is PayU S.A. with its registered office in Poznań (ul. Grunwaldzka 186, 60-166 Poznań, KRS 0000274399), a national payment institution supervised by the Polish Financial Supervision Authority (*Komisja Nadzoru Finansowego*), which is a separate controller of transaction data with regard to the execution of payments. The data are processed in Poland (EEA).

We issue invoices in accordance with the applicable provisions of law; an invoice may be issued on our behalf by an authorised accounting office. To the extent that an invoice is subject to issuance as a structured invoice, it is issued using the National e-Invoicing System (*Krajowy System e-Faktur*, KSeF); as a result, the data contained in the invoice are transferred to the authorities of the National Revenue Administration (*Krajowa Administracja Skarbowa*) on the basis of the provisions of law. The accounting office providing our accounting services is also a recipient of your data.

Integration with Google Calendar

If a Salon connects the Application with its Google account, we obtain access to its calendar to the extent necessary to handle appointments. We use only the following scopes: calendar.events (creating, modifying and deleting events relating to appointments), calendar.events.freebusy (reading busy time slots so as not to propose conflicting times) and userinfo.email (displaying which account has been connected).

What we record in the calendar. In the event we place the first name and the first letter of the surname of the Salon Client and the time of the appointment. The name of the service is not placed in the calendar by default; the Salon may enable its transfer in the Application settings, acknowledging that the name of the service may disclose data concerning the health of the Salon Client, and being responsible for the legal basis for such disclosure. Other than in that case, we do not place in the calendar any data concerning health, the content of the consultation questionnaire, the Analysis result, photographs or contact details; the Salon Client's e-mail address is not transferred.

Access tokens. We store the refresh token in encrypted form, solely for the purpose of maintaining synchronisation. The Salon may at any time disconnect the account in the Application settings, which results in the revocation of access and the deletion of the token, or at myaccount.google.com/permissions.

Limited Use. The use by dotty of information received from Google APIs is subject to the Google API Services User Data Policy, including the Limited Use requirements. We do not use calendar data for advertising, profiling or analytics, we do not sell them and we do not make them available to third parties, and human access to them is excluded except where required by law, with the user's express consent or where necessary to deal with a failure.

Browser notifications. If you consent to this in your browser, the Application may send you notifications concerning appointment dates. The notification is encrypted and delivered using the Web Push standard, via the push notification service operator appropriate for your browser; the operator does not receive the content of the notification from us and obtains access only to the address of your device and the time of delivery. That operator does not act on our instructions and is not our processor, and it processes the data of its users on its own behalf, on the terms set out in its privacy policy. The notification may be visible on the screen of your device, including on the lock screen. You may withdraw your consent at any time in your browser settings.

Other relevant information

In connection with the use of Google tools, your data may be transferred outside the European Economic Area on the terms described in Part I of this Policy.

What rights do you have?

Your rights are set out in Part I of this Policy.

Part V. Information for persons who are interested in our offer as a result of our marketing activities, including those based on the use of social media and on running a marketing Newsletter

Below we set out the rules for processing personal data that apply when you use and communicate with us through our profiles on social networking sites (referred to as "fan pages" or "profiles"). On our fan pages we regularly publish and share content, offers and recommendations of our services. These rules also apply to sending you our marketing Newsletter as part of the marketing campaigns we run.

For what purpose are your data processed?

We process your data solely in connection with running our social media profiles, including for the purpose of informing you about our activity and promoting various events and services, as well as for the purpose of communicating with you through the features available on social media. We process your data to the extent that you make them available on those sites.

Please remember that the administrators of social networking sites record your activity by means of cookies and other similar technologies at every interaction with our fan pages and other social media sites. Fan page administrators have access to general statistics concerning your interests and demographic data (such as age, gender and region). When social networking sites are used, the scope and purposes of data processing are determined by the administrators of those sites.

With regard to statistics concerning visits to our profiles, we are a joint controller of the data together with the operator of the social networking site. The essence of the arrangement between the joint controllers is made available by the operator of the site.

Your data are also processed for the purpose of sending the marketing Newsletter, through which we inform you about news, interesting offers or events concerning us, as part of our marketing campaigns.

On what legal basis do we process your data?

The legal basis for processing your personal data is:

- our legitimate interest (Article 6(1)(f) of the GDPR) in promoting our own brand and building and maintaining a community associated with the brand;
- your consent to the collection of data for page statistics on social media (Article 6(1)(a) of the GDPR);
- your consent to receiving marketing information from us – our marketing Newsletter (Article 6(1)(a) of the GDPR).

How long do we process your data?

We will process your personal data for as long as is necessary to achieve the purposes described in this Policy, unless you withdraw your consent to the processing of your data earlier. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Social networking sites process your data when you use our fan pages for their own purposes, which are not covered by this Policy. We have no influence on the activities of those sites relating to such processing of data. In this respect, we refer you to the privacy policies of the individual social networking sites.

Who are the recipients of your personal data?

The recipients of your personal data in the case of use of our social media will be our trusted subcontractors – providers of IT services in the field of data hosting and business e-mail services – as well as the companies administering the social networking sites on which we maintain our profiles.

Is providing your data mandatory?

Your personal data, including your IP address, identifiers and other information, are collected by means of cookies or other similar technologies from the moment you connect to our fan pages. **Providing data is entirely voluntary.**

When our fan pages are used, the scope and purposes of data processing on social networking sites are determined by the administrators of those sites. In this respect, we refer you to the privacy policies of the individual social networking sites.

What rights do you have?

Your rights are set out in Part I of this Policy.

Part VI. Cookie Policy

What are cookies and similar technologies?

A cookie is a text file saved by a web server on a computer or mobile device. Its content can be retrieved and read only by the server that created the file. Cookies are unique to the browser or mobile application used. The content of a cookie often consists of identifiers, website names and sequences of numbers and letters.

Strictly necessary cookies

What are strictly necessary cookies and can they be refused?

These cookies are necessary for the website to function and cannot be switched off without affecting the use of this website. These cookies are usually set only in response to specific actions taken by the user on the website. Their use does not require your consent, because they are necessary for the provision of a service that you yourself request – as provided for in the Act of 12 July 2024 – Electronic

Communications Law (*Prawo komunikacji elektronicznej*). We process the personal data collected by means of them on the basis of Article 6(1)(f) of the GDPR, i.e. our legitimate interest in ensuring the proper and secure functioning of the Website and the Application.

Why do we use strictly necessary cookies?

We use them to authenticate you and maintain the session after you log in to the Application, and to ensure the proper and secure functioning of the Website and the Application.

What data are collected and used by strictly necessary cookies?

As a rule, strictly necessary cookies contain only a session identifier. The data collected by means of them may, however, constitute personal data – the rules for their processing are described in Part I and Part II of this Policy. These are the only cookies used on the Website and in the Application. We describe the cookie authenticating the Salon Client in this Policy because it is we who place it on the terminal equipment, and the related information obligation under the Electronic Communications Law rests with us; the Salon Client's data are, however, processed on the instructions of the Salon as controller, on the terms set out in its own privacy policy.

How long do we keep these data?

The retention periods of the individual cookies are indicated in the table below. Cookies used to maintain the session remain on your device for the period indicated there or until you log out or delete them yourself in your browser settings.

Cookies used on our website

The table below shows which cookies we use and why.

Cookie	Name	Purpose	Retention period
First-party	dotty_session	Strictly necessary – authentication and session maintenance in the Salon panel; contains only a random session identifier, without data	30 days
First-party	dotty_client_session	Strictly necessary – authentication and session maintenance of the Salon Client in the part of the Application intended for Salon Clients; contains only a random session identifier	30 days

How can I change my cookie settings?

You can find out more about how to manage cookies in individual browsers here:

- Google Chrome
- Microsoft Edge
- Mozilla Firefox
- Opera
- Apple Safari

As we use only strictly necessary cookies, we do not operate a cookie consent management panel – you make changes in your browser settings. In addition to cookies, the Application uses browser local storage mechanisms (localStorage and sessionStorage), described in Part I of this Policy; you can remove them by clearing the site data in your browser settings.

Part VII. Additional information for persons in the United Kingdom

Who this Part is for

This Part applies to you if you are in the United Kingdom and we process your personal data as controller: for example, you represent a Salon established in the United Kingdom, you belong to the Staff of such a Salon, you visit our Website from the United Kingdom, or you contact us from the United Kingdom. In that case the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 apply to our processing in addition to the GDPR, and the information in Parts I to VI should be read together with this Part. This Part VII has been drawn up in English; in the event of any discrepancy between this Part and the Polish version of the Policy, this Part prevails for persons in the United Kingdom.

Controller and contact

The controller remains DOTTY spółka z ograniczoną odpowiedzialnością, Brzeg, Poland (details in Part I). We are not established in the United Kingdom.

Our representative in the United Kingdom

In accordance with Article 27 of the UK GDPR we have designated a representative in the United Kingdom, whom you may contact instead of or in addition to us on all matters relating to the processing of your personal data:

Item	Details
Representative	Prighter Ltd (company number 12854033)
Address in the United Kingdom	20 Mortlake High Street, London SW14 8JN, United Kingdom
Online contact (requests and questions)	https://app.prighter.com/portal/19145633645

Contacting the representative does not limit your right to contact us directly at rodo@dotty.pl.

Lawful bases

The purposes and lawful bases described in Parts II to V apply in the same way under the UK GDPR. Article numbers in the UK GDPR are the same as in the GDPR. We do not process special categories of personal data about you as a Salon representative, Staff member, Website visitor or correspondent. Where the Salon enters Salon Clients' data into the Application, including data concerning health and photographs, the Salon is the controller of those data and we act as its processor under the Data Processing Agreement and its UK Addendum.

Transfers of your personal data from the United Kingdom

When you use our Website or Application from the United Kingdom, your personal data are transferred to us in Poland and stored on servers in Germany (Hetzner Online GmbH). Poland and Germany are states of the European Economic Area, which the United Kingdom treats as providing adequate protection under adequacy regulations (Data Protection Act 2018, Schedule 21, paragraph 5). No additional safeguards are therefore required for this transfer.

Our e-mail, system notifications and calendar synchronisation are provided by Google Ireland Limited (Ireland, EEA). To the extent that Google processes data in the United States through Google LLC, the transfer is covered by the UK Extension to the EU-U.S. Data Privacy Framework, to which Google LLC has self-certified, and, where that does not apply, by the EU standard contractual clauses together with the UK International Data Transfer Addendum issued by the Information Commissioner.

Your personal data as a Salon representative, Staff member, Website visitor or correspondent are not transferred to the language model provider used by the analysis module of the Application. Information on transfers of Salon Clients' data is provided by the Salon in its own privacy policy and in the Data Processing Agreement with its UK Addendum.

Your rights

You have the rights described in Part I (access, rectification, erasure, restriction, data portability, objection, withdrawal of consent) under Chapter III of the UK GDPR, subject to the exemptions in Schedules 2 to 4 to the Data Protection Act 2018. We respond without undue delay and in any event within one month of receiving your request (the "applicable time period" under Article 12A of the UK GDPR). Where requests are complex or numerous, we may extend this period by two further months; in that case we will inform you of the extension and of its reasons before the end of the first month.

Complaints to us and to the ICO

If you consider that we have infringed the UK GDPR in connection with your personal data, you may complain to us (section 164A of the Data Protection Act 2018) by e-mail to rodo@dotty.pl or through our representative's portal listed above. We acknowledge receipt of your complaint within 30 days and inform you of the outcome without undue delay. You also have the right to lodge a complaint with the Information Commission, the supervisory authority of the United Kingdom, which from 30 September 2026 has replaced the Information Commissioner and continues to use the name Information Commission's Office (ICO) (section 165 of the Data Protection Act 2018):

Information Commission's Office (ICO)
Wycliffe House, Water Lane
Wilmslow, Cheshire SK9 5AF
United Kingdom
Helpline: 0303 123 1113
Online: https://ico.org.uk/make-a-complaint/

You may also complain to the President of the Personal Data Protection Office in Poland (Part I). We would welcome the chance to address your concerns first.

Cookies and similar technologies (PECR)

For users in the United Kingdom, the storage of information on your device and access to it are governed by regulation 6 of, and Schedule A1 to, the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR), as amended by the Data (Use and Access) Act 2025 with effect from 5 February 2026. We use only the two first-party cookies listed in Part VI (authentication and session maintenance) and browser storage (localStorage and sessionStorage) used solely to keep your view settings and an unsaved draft of the consultation questionnaire during your browser session. This storage is strictly necessary for the provision of the service you request, in particular to authenticate you and to maintain a record of the selections you make and the information you enter in the Application (Schedule A1, paragraph 4(2)(e)). We do not use analytical, advertising or tracking cookies, and we do not ask for cookie consent. To the extent that remembering your view settings is regarded as adapting the appearance or features of the Application to your preferences (Schedule A1, paragraph 6), this paragraph provides the required information, and you may object at any time, free of charge, by clearing the site data for the Application in your browser settings; the Application will then revert to the default view. Details of the cookies used are in Part VI.

Marketing communications

If you have given us your business contact details, we may send you information about our services only in accordance with Part V and, for recipients in the United Kingdom, with regulation 22 of PECR.

Whether you are an individual subscriber (including a sole trader or a partnership) or a corporate subscriber, we send electronic marketing only where you have consented to it or where you are an existing customer who was given the opportunity to refuse such messages when your details were collected (regulation 22(3) of PECR), and every message contains a simple means of opting out. You may object at any time at kontakt@dotty.pl.

Data protection fee

DOTTY sp. z o.o. is registered with the Information Commission's Office (ICO) as a fee payer under the Data Protection (Charges and Information) Regulations 2018, registration reference: ZC269067.

Language versions

This Policy is drawn up in Polish and English. The Polish version is published at https://dotty.pl/polityka-prywatnosci/. In the event of any discrepancy between the language versions, the Polish version prevails, except for Part VII, which has been drawn up in English and prevails for persons in the United Kingdom.