

PRIVACY POLICY

1. DEFINITIONS

- 1.1. **Controller** – Glosbe Parfieniuk i Stawiński spółka jawna, with its registered office in Warsaw.
- 1.2. **Mobile App** – the “Glosbe Dictionary” mobile app available for smartphones and other mobile devices, provided by the Controller for mobile devices using Android or iOS.
- 1.3. **Personal Data** – information about a natural person, identified or identifiable by one or several factors defining his/her physical, physiological, genetic, psychic, economic, cultural or social identity, including the IP of the device, location data, online identifier and information collected through cookie files and other similar technologies.
- 1.4. **Glosbe Account** – the user’s profile on the Website and in the Mobile App;
- 1.5. **Policy** – this Privacy Policy.
- 1.6. **GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC.
- 1.7. **Website** – an online service run by the Controller at the address <https://glosbe.com>.
- 1.8. **User** – any natural person visiting the Website, the Mobile App, or using one or more services or functionalities described in the Policy.

2. DATA PROCESSING IN CONNECTION WITH THE USE OF THE WEBSITE OR THE MOBILE APP

- 2.1. In connection with the User’s use of the Website or the Mobile App, the Controller collects data with the scope necessary to provide its respective services and collects information about the User’s activity on the Website or in the Mobile App. The detailed rules and purposes of processing the personal data collected during the use of the Website or the Mobile App by the User are described below.

3. PURPOSES AND LEGAL BASIS OF DATA PROCESSING AT THE WEBSITE OR AT THE MOBILE APP

USE OF THE WEBSITE OR THE MOBILE APP

- 3.1. Personal data of all the persons using the Website or the Mobile App (including the IP address or other identifiers and information collected through cookie files and other similar technologies) who are not registered Users (i.e. persons with no Glosbe Account) are processed by the Controller:
 - 3.1.1. to provide services electronically to provide Users with access to the content collected on the Website or in the Mobile App – in this case, the legal basis for the processing is that processing is necessary for the performance of a contract (Article 6(1)(b) of GDPR);
 - 3.1.2. for analytical and statistical purposes – in this case, the legal basis for the processing is the legitimate interest pursued by the Controller (Article 6(1)(f) of GDPR) to analyze the activity of Users and their preferences in order to improve the functionalities used and the services provided;
 - 3.1.3. to determine and pursue possible claims or defend against claims – the legal basis for the processing is the legitimate interest pursued by the Controller (Article 6(1)(f) of GDPR) to protect its rights;
 - 3.1.4. for the marketing purposes of the Controller and other entities, in particular those associated with displaying behavioral advertising – the rules of personal data processing for marketing purposes are described in section 4. entitled “MARKETING”.
- 3.2. Activity of a User on the Website and in the Mobile App, including his/her personal data, is recorded in system logs (a special computer program for storing a chronological record of

information about events and actions concerning the IT system used for providing services by the Controller). The information collected in logs is processed mainly for purposes related to the provision of services. The Controller also processes the information for technical, administrative purposes and in order to ensure security of the IT system and to manage the system, and also for analytical and statistical purposes – in this respect, the legal basis for the processing is the legitimate interest pursued by the Controller (Article 6(1)(f) of GDPR).

REGISTRATION OF THE GLOSBE ACCOUNT

- 3.3. The persons who register on the Website are asked to provide data needed to set up and maintain an account. To facilitate customer service, the User may provide additional data, thus giving consent to their processing. Such data may be deleted at any time. Provision of data marked as mandatory is required to set up and maintain an account, and a failure to provide them makes it impossible to set up the account. Provision of other data is voluntary.
- 3.4. Personal data are processed:
 - 3.4.1. to provide services connected with running and maintaining the Glosbe Account – the legal basis for the processing is that the processing is necessary for the performance of a contract (Article 6(1)(b) of GDPR);
 - 3.4.2. for analytical and statistical purposes – the legal basis for the processing is the legitimate interest pursued by the Controller (Article 6(1)(f) of GDPR) to analyze the activity of Users on the Website and how they use their accounts and what their preferences are, in order to improve the functionalities used;
 - 3.4.3. to determine and pursue possible claims or defend against claims – the legal basis for the processing is the legitimate interest pursued by the Controller (Article 6(1)(f) of GDPR) to protect its rights;
 - 3.4.4. for marketing purposes of the Controller and other entities – the rules of personal data processing for marketing purposes are described in section 4. entitled “MARKETING”.
- 3.5. One may also create and log into the Glosbe Account using social media accounts (Facebook, G+). In such a case, the Controller’s software will collect, from the User’s social media account, solely the data necessary to register and maintain the account. Information on the scope and purposes of processing personal data through social media may be found on the website of the provider of the respective service.
- 3.6. If the User enters any personal data of other people on the Website or in the Mobile App (including their names, addresses, telephone numbers or e-mail addresses), he/she may only do so provided that this does not breach the law or the personal rights of these persons.

CONTACT FORMS

- 3.7. The Controller ensures technical solutions for contacting it by using electronic contact forms. Using the form requires that personal data are provided, which is needed to contact the User and answer his/her inquiry. The User may also give other data to facilitate contact or inquiry handling. Provision of data marked as mandatory is required to accept and handle an inquiry, and the failure to provide them makes it impossible to handle it. Provision of other data is voluntary.
- 3.8. Personal data are processed:
 - 3.8.1. to identify the sender and handle his/her inquiry sent by the provided form – the legal basis for the processing is the necessity of the processing to perform a contract for providing a service (Article 6(1)(b) of GDPR); for non-mandatory personal data the legal basis for the processing is consent (Article 6(1)(a) of GDPR);
 - 3.8.2. for analytical and statistical purposes – the legal basis for the processing is the legitimate interest pursued by the Controller (Article 6(1)(f) of GDPR) to perform analyses of the inquiries made by Users through the Website or the Mobile App to enhance its functionalities.

4. MARKETING

- 4.1. The Controller processes personal data of Users to perform marketing activities which may involve:
 - 4.1.1. displaying to the User marketing content which is not tailored to his/her preferences (contextual advertising);
 - 4.1.2. displaying to the User marketing content which is tailored his/her interests (behavioral advertising);
 - 4.1.3. sending e-mail messages about interesting offers or content, which in some cases may include commercial information (newsletter service);
 - 4.1.4. conducting other types of activities related to direct marketing of goods and services (sending commercial information electronically and telemarketing activities).
- 4.2. In some cases, the Controller uses profiling in order to carry out the marketing activities. This means that thanks to automatic data processing, the Controller evaluates selected factors concerning natural persons in order to analyze or predict their behavior. The profiling helps to better adjust the provided content for individual User's preferences or interests.

CONTEXTUAL ADVERTISING

- 4.3. The Controller processes personal data of Users for marketing purposes in connection with contextual advertising directed to Users (i.e. advertising which is not tailored to the User's preferences). In these cases, personal data are processed in connection with the pursuit of the Controller's legitimate interest (Article 6(1)(f) of GDPR).

BEHAVIORAL ADVERTISING

- 4.4. The Controller and its trusted partners process personal data of Users, including the Users' personal data collected through cookies and other similar technologies, for marketing purposes in connection with behavioral advertising directed to Users (i.e. advertising which is tailored to the User's preferences). In these cases, personal data processing involves also profiling of Users.
- 4.5. A list of the Controller's trusted partners is available here <https://glosbe.com/ads-partners.pdf>.

DIRECT MARKETING

- 4.6. Users' personal data may be also used by the Controller to send the User marketing content through various channels, i.e. by e-mail, text / multimedia message or by telephone. Such actions are taken by the Controller only when the User has given consent to them, where the consent may be withdrawn at any time.

5. SOCIAL MEDIA

- 5.1. The Controller processes personal data of Users who visit the Controller's profiles in the social media (Facebook, YouTube, Instagram, Twitter). The data are processed only in connection with maintaining the profile, also in order to inform Users about the Controller's activity and promote various events, services and products. The legal basis of the personal data processing by the Controller for the above purpose is the Controller's legitimate interest (Article 6(1)(f) of GDPR) to promote its own brand.

6. ADDING CONTENT

- 6.1. The Controller allows registered Users to add or edit the content (entries, images, graphics and recordings) available on the Website and in the Mobile App. Only registered Users are allowed to add or edit the content. Information on Users' activities with regard to adding or editing content will be available publicly to all the Users. Data shown in public are the following: name, surname, description of added or edited content, Glosbe Account name, data and time of adding or editing of content.
- 6.2. Personal data are processed:

- 6.2.1. to make the content available in the services provided by the Controller – the legal basis for the processing is that the processing is necessary for the performance of the contract (Article 6(1)(b) of GDPR);
- 6.2.2. to manage the content (including eliminating of spam) and to mark the User publishing the content – the legal basis for the processing is legitimate interest (Article 6(1)(f) of GDPR) pursued by the Controller to approve content provided by the User and to make it public.

7. COOKIES AND SIMILAR TECHNOLOGIES

- 7.1. Cookies are small text files installed on the device of a User browsing the Website. Cookies collect information to facilitate using a website, e.g. by remembering the User's visits at the Website and actions performed by him or her.

“SERVICE” COOKIES

- 7.2. The Controller uses the so-called “service” cookies primarily to provide the User with services electronically and improve the quality of these services. Accordingly, the Controller and other entities providing analytical and statistical services on its behalf, storing information or gaining access to information already stored in the User's terminal telecommunications equipment (a computer, telephone, tablet, etc.). Cookie files used for the above purpose include:

- 7.2.1. user input cookies (session identifiers) stored for the duration of a session;
- 7.2.2. authentication cookies used for services that require authentication for the duration of a session;
- 7.2.3. user-centric security cookies, e.g. used to detect abuses concerning authentication;
- 7.2.4. multimedia player session cookies (e.g. flash player cookies);
- 7.2.5. persistent user interface customization cookies for the duration of a session or slightly longer.

“MARKETING” COOKIES

- 7.3. The Controller and its trusted partners also use cookies for marketing purposes, e.g. in connection with sending behavioral advertising to Users. For this purpose, the Controller and its trusted partners store information or gain access to information already stored in the User's terminal telecommunications equipment (a computer, telephone, tablet, etc.).

8. ANALYTICS AND MARKETING TOOLS USED BY THE CONTROLLER'S TRUSTED PARTNERS

- 8.1. The Controller and its trusted partners use various solutions and tools for analytical and marketing purposes. The basic information regarding those tools are available below. Detailed information may be found in the related partner's privacy policy.

GOOGLE ANALYTICS

- 8.2. Google Analytics cookies are files used by the Google company to analyse the manner in which the User uses the Website or the Mobile App, to generate the statistics and reports regarding the functioning of the Website and the Mobile App. Google does not use the collected data, as well as does not link this information in order to allow Google or any third party to identify the User. Detailed information about the manner and scope of collected data in connection with use of Google Analytics is available here: <https://www.google.com/intl/pl/policies/privacy/partners>.

GOOGLE ADWORDS

- 8.3. Google AdWords is a tool allowing to measure the effectiveness of the Controller's marketing campaign, allowing to analyse data like keywords or a number of unique Users. Google AdWords platform allows to present our advertisement to Users who have visited the Website in the past. Information on processing the personal data by Google with regard to Google AdWords is available here: <https://policies.google.com/technologies/ads?hl=pl>.

SOCIAL MEDIA WIDGETS

- 8.4. We use social media (Facebook, Google+) widgets to allow Users to share the content available in the Website or Mobile App in the social media. By using widgets, the social media provider is informed of using the service by the User, and may connect information of using the services with the User's social media account. The Controller is not aware of the scope and purposes of processing personal data by social media providers. Detailed information may be found at:

8.4.1. Facebook: <https://www.facebook.com/policy.php>

8.4.2. Google: https://privacy.google.com/take-control.html?categories_activeEl=sign-in

9. COOKIES MANAGEMENT

- 9.1. Use of cookies for the purpose to collect data, including the purpose to access data saved on the User's device, requires the User's consent. The consent may be withdrawn at any time.
- 9.2. The consent is not required only for cookies necessary for providing the service (transmission of data for the purpose of showing content).
- 9.3. Withdrawal of consent to use cookies is possible by the web browser's settings. Detailed information may be found at:
- 9.3.1. Internet Explorer: <https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies>
- 9.3.2. Mozilla Firefox: <http://support.mozilla.org/pl/kb/ciasteczka>
- 9.3.3. Google Chrome: <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>
- 9.3.4. Opera: <http://help.opera.com/Windows/12.10/pl/cookies.html>
- 9.3.5. Safari: <https://support.apple.com/kb/PH5042?locale=en-GB>
- 9.4. The User may review its current privacy settings for each web browser by using the following tools:
- 9.4.1. <http://www.youronlinechoices.com/pl/twojeybory>
- 9.4.2. <http://optout.aboutads.info/?c=2&lang=EN>

10. PERIOD OF PERSONAL DATA PROCESSING

- 10.1. The period of data processing by the Controller depends on the type of provided service and the purpose of the processing. In principle, data are processed for the entire period of providing the service or fulfilling a purchase order until the moment of withdrawing consent or filing an effective objection to the data processing in the cases where the legal basis for the processing is the Controller's legitimate interest.
- 10.2. The data processing period may be extended if processing is necessary to determine and pursue possible claims or defend against claims and, after that time, only when and to the extent required by law. After the elapse of the processing period, the data are irreversibly deleted and anonymized.

11. USERS' RIGHTS

- 11.1. A User has the right to: access the content of the data and demand its rectification, erasure, restriction of processing, the right to data portability and the right to object to data processing, as well as the right to lodge a complaint with the supervisory authority responsible for personal data protection.
- 11.2. To the extent that a User's data are processed on the basis of his/her consent, the consent may be withdrawn at any moment by contacting the Controller using the addresses specified in point 15 below.
- 11.3. A User has the right to object to data processing for marketing purposes if the processing is done in connection with the Controller's legitimate interest and also – for reasons connected with the User's particular situation – in other cases when the legal basis for data processing

is the Controller's legitimate interest (e.g. in connection with carrying out analytical and statistical objectives).

12. DATA RECIPIENTS

- 12.1. In connection with provision of services, personal data will be disclosed to external entities, including in particular vendors responsible for maintenance of IT systems, entities such as banks and payment operators, entities providing accounting services, couriers (in connection with fulfillment of a purchase order), marketing agencies (regarding marketing services) and entities related to the Controller, including companies from its group.
- 12.2. If a User's consent is obtained, his/her data may also be made available to other entities for their own purposes, including marketing purposes.
- 12.3. The Controller reserves the right to disclose selected information items referring to the User to relevant authorities or third parties which will demand that they are provided such information pursuant to an appropriate legal basis and in compliance with prevailing laws.
- 12.4. The User's login will be made public when adding or editing the content.

13. TRANSFER OF DATA OUTSIDE THE EEA

- 13.1. The level of personal data protection outside the European Economic Area (EEA) differs from that guaranteed by European law. For this reason, the Controller transmits personal data to places outside the EEA only when necessary and ensuring an adequate protection level, mainly by:
 - 13.1.1. cooperating with personal data processors in the states with respect to which a relevant decision of the European Commission has been issued;
 - 13.1.2. application of standard contractual clauses issued by the European Commission;
 - 13.1.3. application of binding corporate principles approved by the relevant supervisory authority;
 - 13.1.4. if data is transferred to the USA – cooperation with entities participating in the Privacy Shield program, approved by a decision of the European Commission.

14. PERSONAL DATA SECURITY

- 14.1. The Controller conducts an ongoing risk analysis to ensure that personal data are processed in a secure manner, guaranteeing first of all that access to the data is provided only to authorized persons and only to the extent necessary for them to perform their tasks. The Controller makes sure that any operations on personal data are recorded and performed only by authorized employees or collaborators.
- 14.2. The Controller takes any necessary actions so that also its subcontractors and other cooperating entities have guaranteed the application of appropriate security measures in each case when they process personal data on the Controller's behalf.

15. CONTACT DATA

- 15.1. The Controller may be contacted by e-mail cloud.inside@gmail.com or by letter sent to the mailing address: Glosbe Parfieniuk Stawiński sp. j., ul. Erazma Ciołka 12/428, 01-402 Warsaw.

16. AMENDMENTS TO THE PRIVACY POLICY

- 16.1. The Policy is verified on an ongoing basis and updated when needed. The present version of the Policy was approved and has been in force since 1 January 2019.