

Privacy policy

Mobile application Todoo

registered in the Tax Register under identification number 1077556799

(hereinafter referred to as “**Todoo**”, “**we**”)

A. Users as Data Controllers

Information on the processing of users’ personal data

1. Users sign up for Todoo application using an e-mail and password. Todoo works only with the following data when operating the service:
 - *name,*
 - *e-mail,*
 - *location, (used in algorithmic searches)*
 - *image shown on the profile photo.*
2. In the operation of our service we also work with data on activities and connections of users.
3. We process all this personal data with the aim of providing it to other users based on their selection, therefore we act as a **Processor** for the Controller – user.
4. In case of any questions for individual users related to the personal data processing or exercising your rights, contact the relevant user at its contact e-mail address.
5. Pursuant to Art. 28 of *Regulation (EU) 2016/679 of the European parliament and of the Council 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 referred to as the “**Regulation**”), we state that:
 - a. *We process the personal data of users, with the exceptions specified in the Terms and Conditions of the Service or in this Policy, to enable the provision of the service for users;*
 - b. *We will take technical, organisational and other measures to prevent unauthorised or accidental access, change, destruction, loss or other unauthorised use of personal data;*
 - c. *We use secured access to the personal data database, we enter the accesses so that they are not displayed, saved, disclosed to a third-party, we do not create copies of the database of personal data, we use appropriate security means,*

e.g. encryption or other appropriate and necessary means, always depending on the specific action and data, we will not allow third parties to access the data, unless such access is approved by the user or arises from the Terms and Conditions of the Service or our contractual relationship, we maintain confidentiality of the data, we only process the data in the form in which it was provided to us, we only process the data for the purposes specified in this Policy and only to the extent necessary for fulfilling the purpose, we do not combine personal data received for different purposes;

- d. We will ensure that employees and other persons authorised to process the personal data only process it to the extent and for the purpose according to our contractual relationship or Terms and Conditions, and the Regulation;*
- e. When processing personal data, we comply with obligations specified by the Regulation and generally binding legal regulations, and we expect the same from the users;*
- f. Users agree that we can authorise another processor without additional express specific permission (hereinafter referred to as the “**Subprocessor**”) for the purposes of development, maintenance and management of the service – if we engage the Subprocessor, it will be subject to the same obligations of personal data protection under the contract as specified in this Policy, Terms and Conditions and the Regulation;*
- g. We will provide the user with all information necessary to document that obligations specified in this Policy, Terms and Conditions or Regulation have been met regarding the personal data, and we will allow the Controller to perform an audit to the reasonable extent – the audit must be reported sufficiently in advance, no later than 30 business days before the audit, and the audit must not interfere inappropriately with our activities. The costs of audit not incurred due to a clear violation of our obligations shall be borne by the user;*
- h. In case of any termination of the personal data processing for the user, we will dispose of the personal data provided to us on the basis of our relationship, unless there is a different legal title for further processing;*
- i. We will maintain confidentiality of the processed data, in particular we will not publish, disseminate or provide it to persons other than employees or persons authorised to process the data.*

B. We as Data Controllers

Sending commercial notifications

1. If you use our service, we will process your e-mail address in order to send commercial notifications; in this position we act as the Data **Controller**.
2. Personal data are stored and processed for the above purpose for 3 years from the last sign-in to the user account.
3. Such processing is allowed under Art. 6 (1) (f) of the Regulation – based on legitimate interest of the Data Controller. You have the right to object against such processing at any time either by sending an e-mail to the address todoo.life@gmail.com or simply by unsubscribing in the relevant commercial notification.

Information on the processing of users' personal data

1. As the Data Controller, we also process the following data of the users:
 - *name,*
 - *e-mail,*
 - *image shown on the profile photo,*
 - *location of the user,*
 - *information about activities and connections of users*

in accordance with the Regulation, in order to administer the user account, enable the service provision and for the purpose of documenting the contract and possible future exercising and defending the rights and obligations of the Parties.

2. Personal data are stored and processed for the above purpose for 2 years from the last sign-in to the user account or the last service subscription, whichever is later, unless other legal regulation requires the contractual documentation to be stored for a longer period.
3. The above processing is allowed under
 - Art. 6 (1) (b) of the Regulation – processing necessary for the performance of a contract,
 - Art. 6 (1) (c) of the Regulation – processing necessary for compliance with a legal obligation of the Controller, and
 - Art. 6 (1) (f) of the Regulation – processing necessary for the purposes of the legitimate interests pursued by the Controller.

4. We are also entitled to use the following processors or third parties for the processing:

- *Administrator of the Amazon AWS server section;*
- *Provider of the STRIPE payment services;*
- *One Signal notifications provider;*
- *Or other providers of processing software, services and applications, which we are not using currently.*

Your rights

Please note that according to the Regulation you **have the following rights to us as the Data Controller:**

- *to unsubscribe from receiving the commercial notifications at any time,*
- *to withdraw from any consent,*
- *to raise an objection against the processing based on the legitimate interest at todoo.life@gmail.com*
- *to ask us which of your personal data is processed, to request a copy of the processed personal data,*
- *to request access to this data from us and have it updated or corrected, or require restriction of processing,*
- *to request the deletion of this personal data from us – we will do so if it is not contrary to applicable legal regulations or our legitimate interests; however, the deletion may result in the user not having access to the Service or not being allowed to use the Service and its features,*
- *to effective judicial protection if you believe that your rights under the Regulation have been violated as a result of processing your personal data contrary to this Regulation,*
- *to lodge a complaint with the Office for Personal Data Protection.*

You can contact us at any time at todoo.life@gmail.com