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Appendix to Resolution No. 2/2025/Z
of the Management Board of the Foundation for Women and Family Planning
of 24 February 2025

PRIVACY POLICY OF THE 'CHATMAJA' SERVICE
PROVIDED BY
THE FOUNDATION FOR WOMEN AND FAMILY PLANNING
('Privacy Policy')

I. Personal Data Administrator

The administrator of personal data is the Foundation for Women and Family Planning with its office registered at 13/15 Nowolipie Street, 00-150 Warsaw, entered into the National Court Register by the District Court for the Capital City of Warsaw in Warsaw, XII Commercial Division of the National Court Register, entry number: KRS 0000919580. The Administrator can be contacted at: kontakt@federa.org.pl .

II. Definitions

The terms used in the document shall have the following meanings:

1) **Foundation, Administrator** — The Foundation for Women and Family Planning with its office registered at 13/15 Nowolipie Street, 00-150 Warsaw, entered into the National Court Register by the District Court for the Capital City of Warsaw in Warsaw, XII Commercial Division of the National Court Register, entry number KRS 0000919580.
2) **Chatbot** - *the SRHR Informant Chatbot,* 'ChatMaja', i.e. a service that constitutes an automatic tool for supporting communication with the Foundation with the use of the option provided on the federa.org.pl website or via the Signal communicator and serves as a means to answer questions related to reproductive health and reproductive rights.
3) **Visitor** – a person visiting the website federa.org.pl that is a property of the Foundation. The Visitor shall be identifiable from the moment in which the Administrator receives data that allows identification, i.e. by indicating data related to the network, providing contact or other data that may allow to connect the Visitor with a natural person.
4) **Cookies** – small blocks of data, commonly called cookies, created and sent by the visited website, and saved on the end device that has been used for connection (computer, laptop, smartphone).
5) **Tracking IDs** – technology that enables to track visits to websites and services and is provided by external Providers. The technology operates on the servers'

side and is based on assigning unique codes to connection parameters, browser features, version of the used device and its operating system, screen resolution, as well as selected language version and time zone assigned. Combined together, they allow to create a relatively unique device ID that can be used to approximately identify the Visitors.

6) **Providers** – third parties providing services to the Foundation in order to maintain the solutions necessary for the operation of the Chatbot. The Providers enable access to platforms that offer tools and services that may also include data that allow to identify Visitors.

7) **EEA** – European Economic Area is a free trade and common market area, including the European Union and the European Free Trade Association (EFTA) countries, with the exception of Switzerland.

8) **GDPR** – the General Data Protection Regulation of the European Parliament and European 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).

9) **Signal, Signal Communicator** – an internet instant messenger, available as a mobile and desktop application that enables its users to send messages and make voice calls with the use of end-to-end encryption technology. The communicator operates in accordance with the rules described in the regulations and privacy policy available on the website: https://signal.org/legal/.

III. Rules, scope, and purpose of personal data processing

As a provider of the Chatbot service, the Foundation processes the data of its users. The main purpose of collecting personal data by the Foundation is to manage and operate the Chatbot.

The Foundation collects personal data on the basis of a number of premises. In the case of communication with the Chatbot, the Foundation can process personal data based on explicit consent (i.e. voluntary, specific, informed, and unambiguous consent). For this reason, regardless of the communication channel, before starting the conversation, the Chatbot informs users about the rights of the Visitor and the Foundation's obligations that are related to them. Measuring data shared by Visitors'

devices when using the Chatbot can be employed for further development, design, and creation of solutions, customizing functions, improvement, and development of advice provided by the Chatbot.

When during the conversation with the Chatbot, contact details or other data that identify or allow to identify natural persons are provided, and their provision is a result of the measures taken by these natural persons, the contact for specific purposes (e.g. answers or assistance) shall be based on the consent of the natural person expressed in accordance with Article 6(1)(a) of the GDPR, or in the case of situations when highly sensitive data may be revealed, in accordance with Article 9(2)(a) of the GDPR.

When using the Chatbot, information is provided by Visitors voluntarily, regardless of the form of communication (via the website or communicator).

The information obtained automatically is the data collected by the servers that support the Chatbot (including servers that belong to the Foundation), as well as by Providers supporting the process or providing content and materials (e.g., fonts, style sheets, or code). The information obtained in this way may serve as Tracking IDs.

The pieces of information sent automatically are not used by the Foundation in such a scope that would allow their direct connection to the personal data of the Visitors. Such data, however, can enable the Providers of the solutions applied to identify natural persons with a high level of probability and to some extent, also to monitor their online activity through the use of mechanisms such as Tracking IDS. The Foundation itself does not perform such activities, but it relies on aggregated statistical data processed by the Providers who have such a possibility and are able to link the context of the connection to a specific person with a high probability, especially when the person browses other websites while being logged into the social media platforms or messengers/communicators that are part of them.

Because the Foundation intentionally does not collect data identifying specific individuals, but uses solutions available on the market, the Providers of which may have such a possibility, we specifically inform that this form of tracking can be avoided or limited by setting blocking options available for most browsers. Some of them have this feature built-in, and in the case of other browsers, it can be downloaded as a free add-on.

Information about Visitors may be used by Providers who may independently associate the context of the Foundation with specific natural persons using the service. Such

activities do not result in the processing of personal data directly by the Foundation, since it does not have access to them.

We also process the data which, under certain conditions, may indirectly allow to identify individuals who use the Chatbot through metadata and correlation with other sources, such as social media or Signal communicator accounts. The Foundation shall not conduct such correlations but it feels obliged to indicate that it can be done by other entities providing solutions that enable communication with the Chatbot via various channels.

We also point out that using the Internet on devices on which we are logged in to social media results in the correlation of information about us by the providers of social media platforms; this constitutes one of the main sources of information that enable such providers to link the context of natural persons with other services or specific activities. We encourage you to regularly check and adjust your security tools in order to control the information you share online.

Data provided by Visitors are not subject to profiling by the Foundation (automated decision-making).

IV. Data recipients

Some of the Visitors' data, but not otherwise than at their explicit request, may be disclosed to third parties. In certain cases, based on consent or actions that unambiguously indicate consent, the Foundation may share the personal data of Visitors with entities operating within the structures associated with the Foundation and related to providing support or assistance to Visitors.

As the data Administrator, in certain cases, the Foundation can also provide access to personal data to entities such as law enforcement authorities, for example in connection with there exists a suspicion of committing a crime disclosed directly or indirectly during a conversation with the Chatbot.

The Providers of service and technologies, acting as entities that process data in the context of the Chatbot are: Home.pl S.A. – the provider of hosting services for the Foundation's websites and the implementation of the Signal communicator; DialogFlow along with z Google Cloud – the providers responsible for maintaining the Chatbot engine.

The Foundation may entrust the processed (stored) data of the Visitors to the Provider's IT systems - Google Cloud, based in the USA, on the basis of standard contractual

clauses approved by the European Commission and being the basis for the transfer of personal data to third countries outside the EEA. However, due to the strong automation of processes at Google Cloud, the Foundation cannot prejudge whether specific data will actually be processed or stored in the USA.

V. Data security

All activities carried out as part of the Chatbot are subject to technical and organizational security measures, such as encryption, which involves coding the pieces of information entered by Visitors or data displayed to them. It is done in a way that allows such information to be available only through the Visitors' browsers, the communicators used by the Visitors, or the servers supporting the Chatbot. Simultaneously, since it is technically impossible to guarantee that every data transmission on the Internet is fully secure, despite all our efforts to ensure the protection of personal data, the Foundation cannot ensure or otherwise guarantee the absolute security of the information provided by Visitors through the Chatbot.

VI. Personal data processing period

Personal data is stored for no longer than is necessary to fulfill the purpose, which is to provide information through the Chatbot. The data, together with the content of the conversation, are stored for up to 60 days, and in the case of Signal communicator, according to the time setting related to the disappearing message, if applied to the conversation. The Service Provider may set a minimum time during which the conversation with the Chatbot shall be continued despite vanishing messages. After that time the conversation shall be restarted.

In addition, the pieces of information that may to some extent identify the personal data of Visitors are stored for a period corresponding to the life cycle of cookies stored on their devices. Such settings can be changed in any modern browser or by deleting, that is clearing the cookies.

VII. Rights of data subjects - the natural persons whose data is the subject of processing

Every natural person whose data is being processed has the right to:

1) **access their data under Article 15 of the GDPR.** In particular, it constitutes the right to receive confirmation that the personal data is being processed and when it involves:

a) gaining access to your personal data;

b) obtaining information about the purposes of the data processing, about the recipients or the categories of recipients of this data, about the planned data storage period or the criteria for determining this period, about your rights under the GDPR, as well as the right to file a complaint with the supervisory authority, about the source of this data, and about the automated decision-making, including profiling;

c) obtain a copy of your personal data;

2) **request rectification and completion of data under Article 16 of the GDPR.** Data subjects have the right to rectify and complete the personal data they have provided. In terms of other personal data, natural persons have the right to request the rectification of this data (if they are incorrect) and their completion (if they are incomplete);

3) **request deletion of data based on Article 17 of the GDPR.** Data subjects have the right to request the deletion of all or some of their personal data if:

a) the personal data are no longer necessary in relation to the purposes for which they were collected or processed;

b) the data processing was based on consent and this consent was withdrawn;

c) the natural person has objected to the use of their data for marketing purposes;

d) the personal data is processed unlawfully.

Despite the request to delete personal data in connection with lodging an objection, as the Administrator, the Foundation has a right to retain certain personal data to the extent necessary for the purpose of establishing, pursuing, or defending claims, and in order to comply with the obligations provided for by law.

4) **request the restriction of data processing under Article 18 of the GDPR.** Data subjects have the right to request restriction of the use of their personal data in the following cases:

a) when they question the accuracy of their personal data – in such cases, the Administrator restricts their processing for the time necessary to verify the correctness of the data, but no longer than for 7 days;

b) when the data processing is unlawful, and instead of the deletion of the data, the restriction of use has been requested;

c) when the personal data are no longer necessary for the purposes for which they were collected or used, but they are necessary to determine, pursue, or defend claims;

d) when an objection to the use of data has been lodged – in such case, the restriction is set for the time necessary to verify whether – due to specific circumstances – the protection of interests, rights, and freedoms prevails over the interests that are pursued by the Administrator;

5) **data portability under Article 20 of the GDPR.** Data subjects have the right to receive their personal data that they have provided and then transmit it to another personal data administrator of their choice. They also have the right to request that their personal data is sent directly to another administrator, as far as it is technically possible. In such cases, personal data may be sent in the form of files and types of documents that are commonly used, are machine-readable, and allow the obtained data to be sent to another personal data administrator.

6) **object to the processing of data under Article 21 of the GDPR.** Data subjects whose data is processed have the right to object to the use of their personal data at any time if they are processed on the basis of the legitimate interest of the Administrator. If the objection proves to be justified and there is no other legal basis for the processing of personal data, the data shall be deleted with respect to the forms of use for which the objection was filed;

7) **withdraw consent to the processing of personal data under Article 7 of the GDPR.** With regard to personal data whose processing is based on consent, the data subject has the right to withdraw such consent. This right can be exercised by alteration in the settings on the level of the User profile that turn on or off consents for specific processing purposes or by writing to the Data Administrator at the e-mail address indicated at the beginning of this Policy.

8) **file a complaint with a supervisory authority under Article 77 of the GDPR.** If data subject considers that their right to the protection of personal data or other rights granted under the GDPR have been violated, they shall have the right to file a complaint with the President of the Office for Personal Data Protection.

If in the exercise of the above-mentioned rights, the Administrator receives a request, the Administrator shall comply with it or refuse to comply with it immediately, and not later than within one month after receiving it. However, if – due to the complex nature of the request or the number of requests – it is not possible to comply with the request within one month, it shall be fulfilled within the next two months, and the person concerned shall be informed in advance about the intended extension of the deadline.

The Privacy Policy is effective as of 8 March 2025.