

Privacy Policy.

This document is an English translation of the official and binding Polish Terms and Conditions. Your use of our services constitutes your agreement to be bound by the rights and obligations described in this translation. The interpretation and application of these terms are exclusively governed by Polish law. Should any inconsistency arise between this translation and the Polish original, the Polish version is the sole authoritative source for all purposes.

Date of last update: 25 October 2025

The Privacy Policy forms an integral part of the Terms and Conditions.

We are obliged to protect your privacy and to be transparent regarding the collection and use of your personal data. This Privacy Policy explains the manner in which we treat information concerning users of our Service. By using our Service, you entrust us with your data. We appreciate this trust and undertake the protection thereof with the utmost seriousness.

1. Who we are.

The controller of your personal data is us, **Hetman Maksymilian Sawicz**, with its registered office at ul. Żelazna 2, 40-851, Katowice, Poland, Tax Identification Number (NIP): 6343062073, Business Statistical Number (REGON): 543011486, e-mail address: support@hetman.app

2. What data we collect.

In connection with providing and improving our Services, we may collect the following general categories of data:

- Identification and contact data: Information necessary to create and manage a User Account, including an email address, and other data you may voluntarily provide to us.
- Data necessary for the operation of the Service: To enable you to use the email forwarding features, we process information related to operations performed by the system. This includes the automatic, technical processing of the content and metadata of email messages (such as headers) solely for the purpose of their correct forwarding and security verification. No email message content is read by the administrator.
 - In the case of users who have installed the optional extension, which is one of the features offered by the Service that enables the auto-completion of Relays on any website:
 - When creating a Relay, we collect and store the URL of the page on which it was created. Furthermore, when a user visits various websites, their extension may send a verification request to our Service, containing the URL of the currently viewed page, in order to check whether there are any active Relays associated with the User located on it.

- Technical and Service usage data: Information automatically recorded during the use of the Service, such as IP address, browser type, device details, website usage patterns.
- Payment and billing data: Information necessary to process subscription payments; however, detailed data, such as credit card numbers, are processed exclusively by our external payment provider, Stripe.

3. The manner and purpose of processing your data.

We process your data for the following purposes:

- Provision and maintenance of the Service: To create and manage your account, provide the operation of the email forwarding service, realise the functions of the Service, and communicate with you on matters related to your account and technical issues (e.g., notifications about changes).
- Service development and analytics: To analyse how users utilise the Service, diagnose technical problems, and improve the features and performance we offer.
- Security and abuse prevention: To monitor and analyse activity in order to detect, prevent, and respond to fraud, abuse, security, and technical issues, and thereby protect our users and our Service.
- Payment processing: To process transactions and collect charges for Paid Services.

4. Legal basis for processing.

Our processing of your data is based on the following legal bases:

- Performance of a contract: We process your data because it is absolutely necessary for the provision of the Service. When you create an account and accept our Terms and Conditions, you enter into a contract with us. For us to fulfil this contract and provide you with a functioning Service, we must process specific data.
- Legitimate interest: Processing necessary for the purposes of our legitimate interests, which do not override your rights, for purposes of security, direct marketing of our own Service, and service analytics and development.

5. Who has access to your data (Sub-processors).

In order to ensure the reliable operation of our Service, we use the services of trusted partners (data processors). We have concluded data processing agreements with them which guarantee a high level of protection.

- Stripe: Our partner for payment processing. All payments are processed directly by Stripe. We do not store or process full credit card or debit card data on our servers. (<https://stripe.com/en-pl/privacy>)
- Railway: Our hosting service provider for the Service. All data stored with Railway is physically located in a data centre in Amsterdam (European Economic Area). (<https://railway.com/legal/privacy>)
- OVH SAS: Our hosting service provider for the Service. This server is located in a data centre in Germany (European Economic Area). (<https://www.ovhcloud.com/en/terms-and-conditions/privacy-policy/>)
- Cloudflare: We use Cloudflare services to enhance the security, performance, and reliability of our Service. (<https://www.cloudflare.com/privacypolicy/>)

6. Transfer of data outside the European Economic Area (EEA).

We make every effort to ensure that the processing of your data takes place within the territory of the European Economic Area (EEA). However, some of our partners (e.g., Stripe) may process data in the United States. In such cases, we rely on appropriate legal mechanisms, such as European Commission adequacy decisions (e.g., the EU-U.S. Data Privacy Framework) or standard contractual clauses, to ensure a level of protection equivalent to that within the EEA.

7. How we secure your data.

The security of your data is our highest priority. We implement appropriate technical and organisational security measures to protect your data against unauthorised access, loss, or destruction.

All data enabling identification is protected using modern cryptographic methods, including strong encryption (AES-256) and hashing. We continuously review and improve our security practices.

8. How long we store your data.

We store your data only for as long as it is necessary to achieve the purposes for which it was collected, including to meet legal, accounting, or reporting requirements. The storage period depends on the nature of the data and the purpose of the processing.

When data is no longer needed, we securely delete or anonymise it so that it can no longer be linked to you. You also have the right to request the deletion of your data.

9. Your rights regarding data protection.

In accordance with the applicable data protection regulations, you have a number of rights which you may exercise against us:

- Right of access: You may request a copy of your personal data.
- Right to rectification: You may request the correction of inaccurate or the completion of incomplete data.
- Right to erasure ("right to be forgotten"): You may request the deletion of your data.
- Right to restriction of processing: You may request the temporary suspension of processing in specific situations.
- Right to data portability: You may receive your data in a structured, commonly used format and transmit it to another controller.
- Right to object: You may object to the processing of your data based on our legitimate interest.

To exercise any of these rights, please contact us using the details provided in the "Contact" section below. We will respond to your request without undue delay and at the latest within one month.

You also have the right to lodge a complaint with a supervisory authority (the President of the Personal Data Protection Office [Prezes Urzędu Ochrony Danych Osobowych]) if you believe that we are processing your data unlawfully.

10. Changes to the Privacy Policy.

We may periodically update this Privacy Policy to reflect changes in our practices or for other operational, legal, or regulatory reasons. We will notify you of any significant changes via the Service or by email. We encourage you to review this page periodically.

11. Contact

If you have any questions, concerns, or wish to exercise your data rights, please contact us at:

- E-mail: support@hetman.app
- Postal mail: **Hetman Maksymilian Sawicz**, ul. Żelazna 2, 40-851, Katowice, Poland.