

# Privacy Policy

Your privacy is important to us, so please read the following information carefully.

As part of our operations, we process the personal data of natural persons. If you use our services, visit our website, or otherwise communicate with us, it means we are likely processing your personal data.

In this privacy policy, you will find all important information on this topic, including who we are, in what situations, for what purposes, and to what extent we process your personal data, as well as what rights you have.

If anything is unclear or requires further explanation, feel free to contact us—our contact details are provided below.

If you do not agree with our Privacy Policy, please refrain from using our services. Each user independently decides whether to exercise their rights (points 11 and 12 below) related to controlling the processing of their data. Exercising rights that prevent the processing of personal data by the controller, insofar as such data is necessary for the provision of the service, will be considered a resignation from using the service.

## Who are we and how can you contact us?

### Controller

The controller of the personal data of users of the serpdata.io website and all its subpages (hereinafter referred to as the "Service") within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR) is:

SENUTO SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ, with its registered office in Warsaw (02-737), ul. Niedźwiedzia 12b, registered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw, XIII Commercial Division of the National Court Register, under KRS number 0000464809, NIP: 9512367837, REGON: 146703642.

Whenever this privacy policy mentions "controller", "we", "us", "our", etc., it refers to Senuto sp. z o.o.

### Contact Information

You can contact us in the following ways:

- By email: [support@serpdata.io](mailto:support@serpdata.io)
- Via chat, Monday to Friday, from 9:00 to 17:00
- By mail: Senuto Sp. z o.o., ul. Niedźwiedzia 12b, 02-737 Warsaw, Poland

## **Security Measures**

We take efforts to protect the privacy of all users of our Service, in particular by using all legally required precautions to protect users' personal data against loss, destruction, disclosure, unauthorized access, and misuse. Users can also contribute to increasing the security of their data (e.g., by regularly changing their password and using combinations of letters and numbers).

Please note, however, that we are not responsible for the privacy policies of websites to which you may be redirected via links on our Service pages.

## **What we do**

We provide our users with services in the form of software delivered through a web browser as an Application Programming Interface (API), known as Software as a Service (SaaS). This allows you to crawl (i.e., automatically scan) the top 100 search engine results pages (SERPs) based on your query. Our users primarily consist of companies and organizations that enter into service agreements with us. Details of the services we provide are specified in our Terms of Service.

## **Why and on what basis do we process your data?**

This privacy policy applies to all persons visiting and using the Service. The purposes and legal bases of data processing depend on how you use our services or communicate with us, and in what capacity. These situations are described below.

### **Using the Service and providing services**

We process your data to ensure the functionality of our Service, such as browsing content and tailoring the Service to your preferences.

The legal basis is our legitimate interest in enabling you to use the Service and its functionalities (Article 6(1)(f) GDPR).

We process data collected via necessary cookies and similar technologies to ensure the proper functioning of the Service. We rely on our legitimate interest in providing basic website functionalities (Article 6(1)(f) GDPR).

Data collected via functional cookies and similar technologies to remember your settings and personalize the Service are also processed under our legitimate interest (Article 6(1)(f) GDPR).

Analytical cookies and similar technologies used to analyze user behavior and improve the Service are processed based on your consent (Article 6(1)(a) GDPR).

Advertising cookies and similar technologies used for marketing, such as ad personalization and performance measurement, are also based on your consent (Article 6(1)(a) GDPR).

Details on cookies are provided below in the section on Cookies.

Registration is not required to use our services. When entering the Service, a unique API Key is generated for each user. To generate the API Key, we collect the following information: IP address, invisible captcha (Google Captcha v3), and we use identification mechanisms such as "fingerprinting" to recognize individual users. This information is necessary to generate an API Key.

The API Key is always issued to a natural person. This can be the user themselves or an associate of a user (e.g., board member, employee, representative). These persons are referred to as "associates" in this policy.

Thus, we may process your personal data if you are a user or an associate providing personal information on behalf of the user.

The following personal data is processed:

- Name and surname
- Email address
- Company name
- Activity data in the Service (limit usage, keywords, location searched)
- Invoice data (tax ID, company address, company name, contact person)
- Payment data (credit card details – processed by Stripe)

These data are processed for the purpose of concluding and performing the service contract. For users who are natural persons, the legal basis is the necessity of processing for contract performance (Article 6(1)(b) GDPR) and our legitimate interest in establishing or defending claims (Article 6(1)(f) GDPR).

For associates, the basis is our legitimate interest in ensuring contract execution and communication (Article 6(1)(f) GDPR).

### **Business contacts – users, contractors, and their associates**

We interact with actual or potential users (clients), contractors, suppliers, and their associates (e.g., employees, representatives). Such communication may occur via email or phone and involves processing personal data. These data may also appear in contracts.

In the case of contracts with natural persons, the basis is contract performance (Article 6(1)(b) GDPR) and our legitimate interest in legal defense (Article 6(1)(f) GDPR). For associates, the basis is ongoing business contact and contract management (Article 6(1)(f) GDPR).

### **Marketing**

We process your data for our own marketing purposes, including presenting offers, promotions, and additional features, and displaying ads on external platforms like Facebook or Google.

If you consent, we may also send commercial messages via email, SMS, phone, push notifications, or other electronic means.

The legal basis is our legitimate interest in executing your consent to receive marketing messages (Article 6(1)(f) GDPR).

### **Other purposes of the controller**

We also process your data for:

- Establishing, pursuing, or defending legal claims
- Contacting you regarding inquiries, complaints, service changes
- Verifying suspicious activity, detecting and preventing fraud or violations
- Monitoring, testing, and improving services
- Inviting users to participate in projects or interviews

The legal basis is our legitimate interest (Article 6(1)(f) GDPR).

Additionally, we process user data to fulfill legal obligations (e.g., tax or accounting regulations, ensuring accountability). We cooperate with law enforcement and institutions authorized to access your data under applicable laws. The legal basis is a legal obligation (Article 6(1)(c) GDPR).

### **From whom do we collect your personal data?**

#### **Data collected directly from the data subject or the user**

We primarily collect your personal data from you. You provide it to us, for example, by using the Service, subscribing to a newsletter, or other forms of marketing. You can also unsubscribe from the newsletter at any time or completely delete your data from the Service by contacting us at [support@serpdata.io](mailto:support@serpdata.io)—however, this will result in the loss of access to the Service (if the deletion involves data necessary to provide services through the Service). Each newsletter email sent by the Controller includes an opt-out link.

We collect the personal data of users of our Service and individuals representing users who are legal entities, as well as other persons visiting the Service, mainly directly from the individuals to whom the data pertains.

If you are an associate of one of our users, we may have received your data from that user or other associates—e.g., if you are a contact person for a contract or involved in a specific project.

You may also share your personal data with us when contacting us—for example, with questions about our services or submitting complaints via the Service, email, or postal mail.

Additionally, we process data about how you use the Service and our offerings. This includes data on the number of crawls per API Key, the current usage package per the Pricing, and Stripe payment references.

We may also receive personal data from other entities (not users or their associates), provided that the individuals concerned have given their consent to the entity sharing that data with us.

### **Sending commercial information via electronic means**

If you consent to receive commercial information electronically (e.g., by email), such messages constitute commercial communications via electronic means and may also involve direct marketing using telecommunications devices and automated calling systems—depending on the device used to receive such communication.

If you consent to phone or SMS contact for marketing purposes, commercial information will be sent to the phone number you provided. This constitutes direct marketing via telecommunications devices and may be conducted using automated calling systems.

You can withdraw or limit these consents at any time—details below under "Withdrawing Consent and Objecting to Processing."

### **Profiling for marketing purposes**

We do not process your personal data in an automated manner for profiling purposes, i.e., for automatically evaluating personal aspects such as creating analyses or predictions about you.

### **What data do we process?**

#### **General information**

The data we process depends on your usage of the Service, what data you provide, and your role. We may process the following categories of your personal data:

- Name and surname;
- Company name, tax ID (NIP), business address;
- Email address, phone number – provided during payment or for marketing or commercial communication based on separate consent;
- Information on the services and packages you use;
- Payment data (e.g., bank account number, bank name, credit card number, expiration date, and CVC/CCV);
- Data collected via cookies (if consented)—see the Cookies section for details;
- Activity data in the Service (limit usage, keywords, location);
- IP address, device information (browser, screen resolution);
- Any information included in your communications with us (e.g., emails, phone calls, complaints);
- Content and scope of consents given in the Service.

#### **Automatically collected data**

Some of your data is collected automatically while using the Service.

## **Automatically collected data from the Service**

We process usage data such as identifying marks, IP address, telecom terminal ID or IT system used, browser type and language, service usage information, session start and end times, OS type and version, screen resolution, server logs, and similar info.

## **Automatically collected data from third-party providers**

We do not automatically collect personal data from third-party providers.

## **Purposes of processing automatically collected data**

This data is used to analyze traffic, transmit communications, and deliver requested services. It may also be used for personalizing content and ads, including remarketing. Automatically collected data may also be used for profiling and analyzing site traffic.

## **How long do we store your data?**

The storage duration depends on the purpose and legal basis of the processing:

- Based on consent: until withdrawn;
- Based on a contract: during the term of the contract and for the statute of limitations period thereafter;
- Based on legal obligations: as required by law;
- Based on legitimate interest: until the interest ceases or you object.

Storage may be extended if required for legal claims or compliance purposes. Further retention will occur only if required by law.

## **Who do we share your data with?**

### **Processors acting on our behalf**

We share personal data with entities that help us deliver services, for example:

- Payment intermediaries and banks;
- Technology providers for Service functionality;
- Marketing service providers (e.g., for email campaigns);
- Customer service platforms (e.g., GetResponse.pl, mailerlite.com);
- Accounting, legal, audit, consulting, and tax advisors;
- Hosting, email, IT infrastructure, database, and other IT service providers.

We also share your data with authorized employees and associates.

### **Public authorities**

We may be required to share data with public authorities (e.g., law enforcement), in accordance with applicable laws.

### **Transfers outside the EEA**

Data is processed within the European Economic Area. However, we use services from third parties, which may involve transferring data outside the EEA. Where no adequacy decision by the European Commission exists, we rely on Standard Contractual Clauses (SCCs) and assess the transfer's compliance with legal requirements. SCCs include safeguards such as data processing limitations, technical and organizational security measures, and breach notifications.

**Categories of recipients and data shared**

Recipient category	Data shared	Purpose
Providers of web tools and services (internal communication, customer service, hosting, ads, analysis, backups, billing, CRM)	Internet traffic data, (internal name, company info, email, phone, services used, bank/payment info, IP, device info	Customer communication, reporting, advertising, keyword research, service delivery, invoicing, backups
Email providers	Email address	Newsletter and commercial communication delivery

You may request a copy of your personal data transferred to a third country at any time.

**Withdrawing consent and objecting to processing**

**Withdrawing consent**

You may withdraw your consent at any time without reason. Withdrawal does not affect prior lawful processing.

Note: some services require consent, and withdrawal may make them unavailable.

**Objecting to processing**

You may object to:

- Direct marketing and profiling;
- Processing based on our legitimate interest, due to your specific situation.

If you object to direct marketing, we will stop such processing. If you object due to your situation, we will stop processing unless we demonstrate compelling legitimate grounds.

Note: objections to specific purposes (e.g., marketing) do not affect processing for other purposes (e.g., contract performance).

### **How to withdraw consent or object**

Send an email to [support@serpdata.io](mailto:support@serpdata.io).

### **Additional rights you have**

#### **Right of access**

You may request confirmation of data processing and access to:

- Purpose of processing;
- Categories of data;
- Recipients or recipient categories, including third countries or organizations;
- Storage period or criteria;
- Rights to rectify, delete, or restrict processing;
- Right to file a complaint;
- Automated decision-making and profiling information (not currently used).

You may also request a copy of your personal data.

#### **Right to rectification**

You can request correction of inaccurate data and completion of incomplete data.

#### **Right to erasure ("right to be forgotten")**

You can request deletion if:

- Data is no longer needed;
- Consent is withdrawn and no other legal basis exists;
- You object under Art. 21(1) or 21(2) GDPR;
- Data was unlawfully processed;
- Erasure is required by law;
- Data was collected for online services per Art. 8(1) GDPR.

We may refuse erasure if data is needed for claims or required by law.

#### **Right to restrict processing**

You can request restriction if:

- You contest data accuracy;
- Processing is unlawful but you oppose deletion;
- We no longer need the data, but you need it for claims;
- You object under Art. 21(1) GDPR, pending verification of overriding grounds.

#### **Right to data portability**

You can request data in a structured, machine-readable format and transmit it to another controller, if:

- Processing is based on consent (Art. 6(1)(a)) or a contract (Art. 6(1)(b)); and
- Processing is automated.

You may request direct transfer to another controller if technically feasible.

### **How to exercise your rights**

Send an email to [support@serpdata.io](mailto:support@serpdata.io).

Exercising these rights is free. If your requests are manifestly unfounded or excessive, we may charge a reasonable fee or refuse action.

We may require identity verification before fulfilling requests.

We will inform you of action taken within one month. If needed, this may be extended by two months, in which case you will be notified and given reasons for the delay.

### **Right to lodge a complaint**

If you believe your rights have been violated, you may lodge a complaint with the supervisory authority:

President of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw, Poland.

The complaint should include a description of the situation and indicate the rights or freedoms that were violated.

### **Voluntary Provision of Data**

Providing your data is voluntary but may be necessary to achieve certain purposes—for example, to enter into a contract and gain access to the Service. Providing data and granting marketing consents is voluntary.

If data is processed due to our legal obligations, providing your personal data is a legal requirement.

If data is processed based on our legitimate interest, providing your data is voluntary but necessary to achieve the purposes resulting from our legitimate interests.

### **Age**

The Service is not designed for or intended to be used by individuals under the age of eighteen. We do not knowingly collect data from individuals under eighteen years of age.

If we become aware that a user of the Service is under eighteen, we will take appropriate steps to delete their data and restrict future access to the Service.

## **Cookies and Similar Technologies**

### **What are cookies?**

Our Service uses cookies. Cookies are data files, especially text files, commonly used online and stored on your end device (e.g., computer, smartphone, tablet) used to browse websites.

Information stored in cookies can be read by our IT system or by the systems of other entities. Cookies are used to gather information about how you use the Service—for example, by remembering your visits and actions within the Service.

Information (including personal data) collected via cookies is processed by us and may be processed by our partners (“partners”).

### **What types of cookies do we use?**

The Service uses the following types of cookies:

- **Necessary cookies** – ensure the proper operation of the Service, particularly the ability to navigate and use basic features. These are essential and cannot be disabled, as doing so would prevent the Service from functioning.
- **Functional cookies** – used to “remember” your settings and personalize the Service and its features.
- **Analytical cookies** – improve the performance of the Service, gather insights on how you use it, adjust the Service to your preferences, and compile usage statistics. This information may be shared with our partners if you consent.
- **Advertising cookies** – used for marketing, such as ad personalization, performance measurement, and insights into audience engagement. This information may also be shared with our partners if you consent.

We use both session cookies and persistent cookies. Session cookies are stored temporarily and deleted when your browser session ends. Persistent cookies remain stored for a set duration (ranging from 1 day to several years) or until manually deleted. Ending a session or turning off the device does not automatically delete persistent cookies.

We use both **first-party cookies** (from our own domain) and **third-party cookies** (from partners). The cookies we use include HTTP, HTML, PIXEL, and INDEXED\_DB types.

First-party cookies help retain navigation settings, monitor site traffic, personalize content, ensure functionality, detect errors, and for statistical, analytical, and marketing purposes.

Third-party cookies are set by external servers and are used for similar functional, personalization, statistical, analytical, and marketing purposes.

## Details on cookie providers and types used:

Cookie Provider	Cookie Type
serpdata.io	Necessary
serpdata.io	Optional (Analytical)
gstatic.com	Necessary
google.com	Necessary

## Consent to use cookies

Cookies are used in the Service based on your consent, which can be given via cookie settings or browser configuration. Granting cookie consent is voluntary.

Before giving consent, you will be informed of the purposes and your ability to change settings at any time.

You can withdraw your consent or change settings at any time via the cookie settings panel or by deleting cookies from your device.

## How to disable or delete cookies in your browser

Most browsers by default allow cookies. You can change your browser settings at any time to block or restrict cookie storage. You can also delete existing cookies via your browser.

Browser-specific instructions are available on the support pages of popular browsers:

- Microsoft Edge: <https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies>
- Mozilla Firefox: <http://support.mozilla.org/pl/kb/ciasteczka>
- Google Chrome: <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>
- Opera: <http://help.opera.com/Windows/12.10/pl/cookies.html>
- Safari: <https://support.apple.com/pl-pl/guide/safari/sfri11471/mac>

To remember your refusal to use cookies, we must store a cookie reflecting that preference. If your device blocks such cookies, you may be asked for consent each time.

To block cookies altogether, configure your browser to reject them automatically. These settings typically also allow for broader cookie management.

### **Changes to the Privacy Policy**

This Policy is regularly reviewed and updated as necessary.

This Website Privacy Policy is effective as of April 1, 2025.