

PRIVACY POLICY

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§ 1. General Provisions

1. This Privacy Policy sets forth the principles for the processing and protection of personal data of Users of the Service, available at <https://idp.krywok.com>.
2. The controller of personal data is **Hetman Maksymilian Sawicz**, with its registered office at ul. Żelazna 2, 40-851, Katowice, Poland, Tax Identification Number (NIP): 6343062073, Statistical Identification Number (REGON): 543011486, email address: support@krywok.com, hereinafter referred to as the "Controller".
3. Personal data is processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation, GDPR) and the Act of July 18, 2002 on the Provision of Services by Electronic Means.
4. Use of the Service is voluntary, but it is necessary to register an Account and use its functionalities.

§ 2. Scope and Purposes of Personal Data Processing

The Controller processes Users' personal data for the following purposes:

1. Account registration and maintenance, provision of the authentication (login) service - based on Article 6(1)(b) of the GDPR (necessity for the performance of a contract).

- e-mail address,
- password (stored in an encrypted form, unreadable by the Controller),
- internal User identifier (UUID) assigned by the Service,
- information about the selected and configured Authentication Methods.

2. Logging in via external OAuth2 providers (Google, Github) - based on Article 6(1)(b) of the GDPR (necessity for the performance of a contract).

- When using this method, the Service receives the User's e-mail address and the external identifier (UUID) assigned by that provider from the external provider. The Service does not collect other data (such as first name, last name, profile picture).

3. Ensuring the security, stability, and optimization of the Service, as well as accountability (technical logs) - based on Article 6(1)(f) of the GDPR (legitimate interests pursued by the Controller).

- IP address,
- date and time of login,
- browser type and operating system,
- session identifiers,
- information about errors and failures.

- The legitimate interest of the Controller is protection against abuse, ensuring service continuity, technical analysis, and potential establishment of asserted claims.

4. Communication with the User, handling inquiries, and Account deletion - based on Article 6(1)(b) and (f) of the GDPR.

- e-mail address,
- content of correspondence.

§ 3. Data Retention Period

1. The User's personal data (e-mail address, UUID, configuration of Authentication Methods) is processed for the duration of the User's Account in the Service.
2. Upon deletion of the Account, this data is deleted immediately, subject to sections 3 and 4.
3. Technical data (logs, IP addresses) may be stored for the period necessary for security and accountability purposes, but no longer than **12 months**, unless legal provisions (e.g., concerning the statute of limitations for claims) require longer storage in a specific, justified case.
4. Data contained in backups is deleted on a rotational basis, no later than **30 days** after the physical deletion of the data from the primary system.
5. In the event of a request to delete the Account via email, the data will be deleted after positive identity verification, within 30 days of receiving the request, subject to the periods set forth in sections 3 and 4.

§ 4. Data Recipients and Processors

Users' personal data may be entrusted for processing to the following entities (processors):

1. **Railway (servers in the EU)** - an entity providing application and database hosting services. Data is stored on servers located within the European Union.
2. **Cloudflare** - an entity providing DDoS attack protection and content delivery network (CDN) services. Cloudflare acts as a processor solely for the transit of data, meaning that personal data (in particular, IP addresses) passes through its network for optimization and protection purposes, but **is not stored or logged on its servers** for its own purposes. The use of Cloudflare's services is dictated by the Controller's legitimate interest in ensuring the security and stability of the Service.

User data is not transferred to third countries outside the European Economic Area, except for temporary, transitory flow through the Cloudflare network, which is secured by standard protective mechanisms.

§ 5. User Rights

The User has the right to:

1. access their data and receive a copy thereof,
2. rectify (correct) their data,
3. erasure of data ("right to be forgotten") - in cases provided for by law,
4. restriction of processing,
5. object to the processing of data based on the Controller's legitimate interest,
6. data portability,

7. lodge a complaint with the President of the Personal Data Protection Office (ul. Stawki 2, 00-193 Warsaw), if they consider that the processing of personal data violates the provisions of the GDPR.

To exercise their rights, the User may contact the Controller in writing or via email at:

support@krywok.com. The Controller will handle the matter promptly, no later than within one month of receiving the request.

§ 6. Account Deletion Procedure

1. The User may request the deletion of their Account by sending an email to **support@krywok.com**.
2. To verify that the request comes from an authorized person, the Controller requires that the message be sent from the e-mail address associated with the Account.
3. The Controller reserves the right to perform additional verification, e.g., by sending a message with a confirmation code to the User's e-mail address.
4. Upon positive verification, the Controller shall promptly, but no later than within 30 days, delete the Account and the associated personal data, subject to § 3(3) and (4).
5. **Important:** Deleting the Account in the Krywok IDP Service does not result in the automatic deletion of the User's data from External Applications to which they logged in using the Service. The User must delete their data directly within those applications, in accordance with their terms of service.

§ 7. Cookies and Similar Technologies

1. The Service uses cookies and similar technologies solely for purposes necessary for the proper functioning of the Service and ensuring security.
2. These are so-called "strictly necessary cookies," which enable:
 - maintaining the User's session after logging in,
 - remembering the selected Authentication Method,
 - protection against attacks,
 - basic security functions implemented by Cloudflare.
3. The Service does not use cookies for marketing, analytical, or profiling purposes.
4. The User may change their cookie settings in their web browser. Restricting the use of necessary cookies may prevent the use of the Service.

§ 8. Final Provisions

1. The Controller reserves the right to amend this Privacy Policy. Users will be informed of any material changes with reasonable notice via information on the Service or by email.
2. For any matters concerning the processing of personal data, please contact us at:
support@krywok.com.