

RelineAI Privacy Policy

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1. General Information

1. This Privacy Policy sets forth the rules aimed at informing about all aspects of the process concerning the collection, processing, and protection of your personal data. The Policy is addressed to all users (hereinafter: "Users") of the Administrator's Website and the RelineAI Application.
2. This Privacy Policy establishes the rules for the processing of personal data by the Data Administrator, which is: **RelineAI Sp. z o.o.**, Tax ID (NIP): 7162848161, National Court Register (KRS): 0001174513, REGON: 541791712, address: ul. Ignacego Mościckiego 1, 24-110 Puławy, Poland (hereinafter: "Administrator").
3. Contact regarding the processing of personal data is possible via email at: contact@relineai.com or by mail to the Administrator's registered office address.
4. This Privacy Policy may be amended and updated in the event of changes in personal data processing practices or changes in generally applicable law. The Administrator will duly inform Users of the Website about changes to the Policy by posting appropriate information on the Website.
5. Using the Administrator's Website and Electronic Services requires the User to review and accept the content of this Privacy Policy and the Terms and Conditions of Electronic Services.
6. Providing personal data to the Administrator is voluntary but is a necessary condition for using the Website and Electronic Services.

2. Definitions

1. **Administrator** means the entity that determines how and for what purposes Personal Data is Processed. The Administrator is responsible for ensuring that the processing complies with applicable data protection laws.
2. **Personal Data** means any information relating to an identified or identifiable natural person.
3. **Process, Processing, or Processed** means any operations performed on Personal Data, whether automated or not, such as: collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
4. **Processor** means any person or entity that Processes Personal Data on behalf of the Administrator (other than an employee of the Administrator).
5. **Website** – <https://reline.ai>
6. **Application** – the RelineAI web application for retail store layout generation, accessible via the Website or a dedicated URL, provided to clients under a service agreement.
7. **Administrator's Social Media Fanpage:** LinkedIn at <https://www.linkedin.com/company/reline-ai/>
8. **Electronic Services** – services provided through the Website. The provision of Electronic Services to Users on the Website is subject to the terms specified in the Terms and Conditions of Electronic Services and the RelineAI Application Terms and Conditions.

3. Processing of Users' Personal Data

1. The Administrator may collect Users' Personal Data, in particular, in the following cases:
 - When Users provide Personal Data (e.g., via email, phone, contact form, or any other method) based on Article 6(1)(f) of the GDPR (legitimate interest of the Administrator – responding to a message or inquiry) in connection with the need to handle a reported matter or inquiry,
 - When Personal Data is collected as a result of Users' registration on the Administrator's Website, e.g., creating an Account and enabling its use, handling requests and complaints, for the purpose of concluding and performing a contract, based on Article 6(1)(b) of the GDPR (performance of a contract/acceptance of the Terms and Conditions of Electronic Services), including, e.g., handling the complaint process, based on Article 6(1)(b) of the GDPR,
 - Pursuing claims and taking actions related to defending the Administrator's rights, conducting legal proceedings, and, among others, enabling the use of the Website through cookies, preventing fraud in the use of the Website and Electronic Services, in particular for the maintenance, improvement, and provision of all its functionalities, as well as creating reports, analyses, and statistics for the Administrator's internal needs. This includes, in particular: reporting, marketing research, planning the development of the Website and Electronic Services, development work, opinion surveys, and creating statistical models, based on Article 6(1)(f) of the GDPR (aforementioned legitimate interest of the Administrator),
 - Collecting Personal Data of Users published on social media (Administrator's Fanpage) (e.g., collecting information from Users' private social media profiles to the extent that such information is publicly visible) based on Article 6(1)(f) of the GDPR (legitimate interest of the Administrator – promoting its own activities and services, managing a social media profile (Fanpage), building and strengthening customer relationships, conducting analyses and statistics regarding the popularity and functioning of the profile, as well as establishing, pursuing, and defending against potential claims related to the use of the profile, responding to contact),
 - User's consent to the processing of provided personal data for the purpose of sending a Newsletter, based on Article 6(1)(a) of the GDPR (consent), sending commercial information – Newsletter, sharing marketing content via telephone communication or SMS messages, based on the Act of July 12, 2024, on Electronic Communications Law,
 - Collecting or requesting Users to provide Personal Data during visits to the Administrator's websites or use of any features or resources available on or through the Website – including cookies. When Users visit the Website, their devices and browsers may automatically share certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connection to the Website, and other technical communication information), some of which may constitute Personal Data. During a visit to the Website, no Personal Data of Users will be stored by the Administrator without an appropriate legal basis. Regarding cookies, the Administrator – apart from essential cookies – will always obtain the User's consent for the installation of other cookies. Providing the aforementioned consent is optional and does not affect the ability to use the Website. Processing is based on Article 6(1)(a) of the GDPR (consent – for non-essential cookies) and Article 399 of the Electronic Communications Law (legal provision – for essential cookies).
2. Providing Personal Data is voluntary and not a statutory obligation. However, in certain cases, failure to provide Personal Data may prevent the use of the Website or Electronic Services. The categories of Users' Personal Data processed by the Administrator may include, in particular:
 - **Personal details:** first name(s), last name(s).
 - **Contact details:** company details, email address, phone number.

- **Content of communications:** all communications (inquiries, statements, views, and opinions) sent via the contact form or published on the Administrator's Website or Fanpage by the User.
 - **IP address, cookies, and information about the use of our Website and Electronic Services** – during the use of the Website or Electronic Services.
 - **Image:** in the case of posting opinions, leaving comments, or clicking the "Like" button on the Administrator's social media Fanpage (if the User has made their image publicly available on their private account on that platform).
3. The Administrator uses Fanpage-type profiles on social media platforms. Public data shared by Users on social media may be used for:
- Responding to private messages directed to us.
 - Conducting discussions within comments under individual posts.
 - Sharing our posts with individuals following our Fanpage.
 - Marketing purposes, consisting of informing about our services and ourselves through posts placed on our Fanpage, including sponsored posts displayed to a wider group of Users.
 - Statistical purposes, consisting of presenting data on the visibility of our posts, their reach, and the number of interactions; the data provided to us by the owners of social media platforms are statistical data but are created based on observations of behavior on our Fanpage.
4. Currently, the Administrator's Website includes redirects to the following social media platform (Fanpage): LinkedIn – <https://www.linkedin.com/company/reline-ai/>
5. Upon liking the Administrator's post, leaving a comment, sending a private message, or subscribing to a channel, the Administrator, together with **LinkedIn Ireland Unlimited Company**, Wilton Place, Dublin 2, Ireland, becomes a joint controller of your Personal Data.
6. In this regard, we encourage you to review the privacy policy of LinkedIn: <https://pl.linkedin.com/legal/privacy-policy>

4. Application-Specific Data Processing

In addition to the general data processing described above, the following applies specifically to the processing of Personal Data within the RelineAI Application:

4.1. Types of Data Processed in the Application

- **User account data:** name, email address, organizational role, authentication credentials.
- **Project data:** floor plans, layout designs, project parameters, configuration of standards and libraries.
- **Usage data:** actions performed within the Application, timestamps, feature interactions, session information.

4.2. Legal Basis

Processing of the above data is based on Article 6(1)(b) of the GDPR (performance of a contract) – the data is necessary for the provision of the Application services under the applicable service agreement.

4.3. Infrastructure and Storage

All Application data is stored on **Microsoft Azure** infrastructure in the EU region (Ireland/Netherlands), utilizing:

- Azure App Service – application hosting
- Azure Database – relational data storage
- Azure Blob Storage – file and document storage

4.4. Encryption

- **In transit:** TLS 1.3 or higher for all data transmissions.
- **At rest:** AES-256 encryption for all stored data.

5. Sharing Personal Data with Third Parties

1. The Administrator may share Users' Personal Data with:
 - Entities entrusted with data processing, e.g., providers of technical services or entities providing advisory services,
 - Other administrators, if required by law or in good faith that such action is necessary to comply with applicable legal provisions, particularly in response to a request from a court or state authorities.
2. If we engage a third party to Process Users' Personal Data, pursuant to a data processing agreement concluded with such entity, the Processor will be obligated to:
 - Process only the Personal Data specified in prior written instructions from the Administrator; and
 - Implement all measures to protect the confidentiality and security of Personal Data and ensure compliance with all other requirements of generally applicable law.
3. Due to the use of LinkedIn services, data may be transferred by LinkedIn to third countries, specifically the United States of America (USA), in connection with their internal sharing with **LinkedIn Corporation**, over which the Administrator has no control. LinkedIn Ireland Unlimited Company acts as a joint controller and has its own safeguards for international data transfers.

6. Sub-Processor List

The Administrator engages the following sub-processors for the provision of the Application and related services:

Sub-Processor	Location	Purpose
Microsoft Azure (Microsoft Ireland Operations Ltd.)	Ireland / Netherlands (EU)	Cloud infrastructure, database hosting, blob storage
Microsoft Entra (formerly Azure AD)	Ireland / Netherlands (EU)	Identity management and authentication services

Note: This list will be updated as additional sub-processors are engaged. Clients will be notified of any changes in accordance with the applicable Data Processing Agreement.

7. Third-Party Services

1. The Website may contain features or links redirecting to websites and services provided by third parties that are not managed by us. Information you provide on these websites or services will be subject to their own privacy policies and data processing procedures.
2. The Administrator is not responsible for the procedures related to data processing by independent administrators of websites and service providers.
3. We encourage you to review the privacy and security policies of third parties before providing them with any information.

8. Data Protection

1. The Administrator informs that it has implemented appropriate technical and organizational measures to protect Personal Data, including safeguards against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of Processing, in accordance with applicable law.
2. The Administrator is not responsible for the actions or omissions of Users. Users are responsible for ensuring that all Personal Data is transmitted to the Administrator securely.
3. Personal Data will not be subject to automated profiling, i.e., automated decision-making regarding the User, meaning decisions made by technical means without human involvement, which produce legal effects concerning the profiled person or otherwise significantly affect the profiled person.

9. Technical and Organizational Measures (TOMs)

The Administrator has implemented the following technical and organizational measures to ensure the security and integrity of Personal Data:

9.1. Access Control

- Role-Based Access Control (RBAC) enforced across all Application components - applies only if the RBAC feature is enabled for the User's deployment or if the Application is used in a multi-user environment requiring differentiated access rights.
- Multi-Factor Authentication (MFA) required for all administrative accounts.
- Identity management via Microsoft Entra (formerly Azure AD) with support for SSO/SAML/OIDC integration.

9.2. Encryption

- Data in transit: TLS 1.3 or higher for all communications.
- Data at rest: AES-256 encryption applied to all databases, blob storage, and backups.

9.3. Backup and Recovery

- Daily automated backups of all Application data.

- Backup retention period: 7 days (rolling).
- Recovery Point Objective (RPO): 5 minutes (point-in-time recovery).

9.4. Monitoring

- Azure Monitor for infrastructure and application performance monitoring.
- Application-level logging for security events, user actions, and system errors.

9.5. Incident Management

- Documented incident response procedures with defined escalation paths.
- Incident classification and response timelines in accordance with the applicable Service Level Agreement (SLA).

9.6. Employee Training and Awareness

- Regular data protection and information security training for all employees.
- Confidentiality obligations for all personnel with access to Personal Data.

9.7. Physical Security

- All data is hosted in Microsoft Azure data centers that are SOC 1, SOC 2, and ISO 27001 certified.
- Physical access to data center facilities is managed entirely by Microsoft in accordance with their security compliance programs.

10. Data Accuracy

1. The Administrator takes all appropriate measures to ensure that:
 - The Personal Data of Users Processed by the Administrator is accurate and, if necessary, updated;
 - All Personal Data of Users Processed by the Administrator that is inaccurate (considering the purpose for which it is Processed) will be deleted or corrected without undue delay.
2. The Administrator may, at any time, inquire about the accuracy of the Personal Data being Processed.

11. Data Minimization

The Administrator takes all appropriate measures to ensure that the scope of Users' Personal Data Processed is limited to the Personal Data reasonably required for the purposes specified in this Privacy Policy.

12. International Data Transfers

1. Personal Data may be shared and processed outside the European Economic Area (the European Economic Area comprises the European Union, Iceland, Liechtenstein, and Norway, collectively "EEA"). If Personal Data is transferred outside the EEA, the Administrator

requires appropriate safeguards. The Administrator will fulfill its obligations under Chapter V of the GDPR to ensure the lawfulness of such processing.

2. **Application data:** The RelineAI Application is hosted on Microsoft Azure infrastructure located within the EU (Ireland/Netherlands). Microsoft has certified under the EU-US Data Privacy Framework and implements Standard Contractual Clauses (SCCs) for any transfers outside the EEA that may occur as part of Azure service operations.
3. **LinkedIn data:** Due to the use of LinkedIn services, data may be transferred by LinkedIn to the United States in connection with their internal operations with LinkedIn Corporation. LinkedIn Ireland Unlimited Company maintains its own safeguards for international data transfers, including reliance on the EU-US Data Privacy Framework and Standard Contractual Clauses.

13. Personal Data Retention Period

13.1. General Retention Criteria

1. The criteria determining the duration of the period for which the Administrator retains Users' Personal Data are as follows: The Administrator retains Users' Personal Data in a form that allows identification only for as long as necessary to achieve the purposes specified in this Privacy Policy, unless generally applicable law requires a longer retention period. In particular, the Administrator may retain Users' Personal Data for the entire period necessary to establish, exercise, or defend claims (limitation of claims pursuant to Article 118 of the Civil Code).
2. Personal Data is retained:
 - For a period of 30 days from the moment of contact (phone, email via the Website); Personal Data may be processed for a longer period if, as a result of the submitted inquiry, the User decides to use the Administrator's services (Website Account, Newsletter, conclusion of a contract);
 - In the case of using our services (Website Account, conclusion of a contract), for the duration of the contract, maintenance of the Account, and the period necessary to handle submitted complaints, until the resolution of any disputes and settlement of the parties, taking into account the applicable limitation periods for claims;
 - For the Administrator's internal purposes, where the legal basis for processing is the Administrator's legitimate interest, Personal Data will be retained until the legitimate interests of the Administrator, which form the basis for processing, are fulfilled, or until an objection to such processing is lodged, following the Administrator's appropriate analysis of the User's interest and the basis for processing;
 - In the case of data processed on our Fanpage, until the User ceases to follow/comment on our Fanpage, e.g., by clicking "unlike," withdrawing a post like, deleting a comment, or unsubscribing;
 - In the case of using our Newsletter service, for the duration of the service or until the User withdraws consent to receiving commercial information electronically.

13.2. Application-Specific Data Retention

The following retention periods apply specifically to data processed within the RelineAI Application:

Data Category	Retention Period
Active account data	Duration of the contract + 30 days
Project data (floor plans, layouts, parameters)	Duration of the contract + 30-day export period
Application logs	Up to 12 months
Backups	7 days (rolling)

14. Offboarding and Data Export Process

Upon termination or expiry of the service agreement governing use of the Application, the following data export and deletion procedures apply:

1. **30-day data export window:** After contract termination, the client has a 30-day period to request and complete the export of their data from the Application.
2. **Supported export formats:** Data may be exported in the following formats: DXF, DWG, JSON, and CSV.
3. **Permanent data deletion:** After the client has confirmed completion of the data export, or upon expiry of the 30-day export window (whichever occurs first), all client data will be permanently deleted from the Application, including all backups, in accordance with the backup retention schedule.
4. **Migration support:** Additional migration assistance may be available at agreed rates upon request.

15. Data Processing Agreement (DPA)

For clients who process personal data through the Application, a Data Processing Agreement (DPA) is available upon request and forms an integral part of the contractual relationship. The DPA details the scope, nature, and purpose of processing, the types of personal data and categories of data subjects, and the obligations and rights of the controller and processor. To request a copy of the DPA, please contact us at contact@relineai.com.

16. Users' Rights

1. In connection with the processing of personal data, you have the following rights:
 - **Right of access to processed personal data** – Upon the request of the data subject, the Administrator provides information about the processing of their personal data, including, in particular, the purposes and legal bases for processing, the scope of the data held, the entities to which the personal data is disclosed, and the planned date of its deletion. As part of the right of access, the data subject may also request information about to whom their personal data is disclosed and whether it is subject to profiling or automated decision-making. The data subject also has the right to obtain a copy of their data.
 - **Right to rectification of data** – Upon the request of the data subject, the Administrator corrects any inaccuracies or errors in the processed personal data and completes or updates it if it is incomplete or has changed;

- **Right to erasure of data** – Upon the request of the data subject, the Administrator deletes data that is no longer necessary for any of the purposes for which it was collected, where consent for its processing has been withdrawn, or an objection has been raised, and it is not required for establishing, pursuing, or defending the Administrator's claims;
 - **Right to restriction and portability of processing** – Upon the request of the data subject, the Administrator ceases performing operations on such personal data to the extent permitted by law and provides the personal data in a format that allows it to be read by a computer;
 - **Right to lodge a complaint** – If a person believes that their personal data is being processed in violation of applicable law, they may lodge a complaint with the President of the Personal Data Protection Office (ul. Stawki 2, 00-193 Warsaw);
 - **Right to object** – The data subject may, at any time, object to the processing of their personal data for the purposes for which it was collected and is being processed;
 - **Right to withdraw consent** – If we process personal data based on consent, the data subject may withdraw this consent at any time. Withdrawal of consent does not render the processing of personal data up to that point unlawful, and it does not affect the lawfulness of prior processing; however, it will result in the personal data no longer being used for those purposes from the moment of withdrawal.
2. The request should, to the extent possible, precisely indicate what it concerns, including the recipient of the request and which of the above-mentioned rights the requesting person wishes to exercise. If the Administrator is unable to determine the content of the request or identify the requesting person based on the submitted request, it will contact the requester for additional information.

17. Cookies

1. When a User uses the Website, data about the User is automatically collected. This data may include:
 - IP address,
 - Domain name,
 - Browser type,
 - Operating system type.
2. This data may be collected through cookies and may be stored in server logs.
3. A cookie is a small piece of text information in the form of text files stored by the browser on your computer's hard drive or on the memory card of a smartphone. During subsequent visits to the Website, the information stored in the cookie is sent back to the Website. This allows the Website to recognize you and tailor content to your needs.
4. To improve our Website and Electronic Services, deliver the most relevant content, and analyze how Users interact with our Website, we may use cookies.
5. We may process data contained in cookies for the following purposes:
 - Personalizing the Website and Electronic Services: remembering User information so that the User does not have to re-enter it during subsequent visits;
 - Providing content and information tailored to the User;

- Monitoring aggregated website usage metrics, such as the total number of visitors and pages viewed.
6. We use the following types of cookies:
- **Session cookies**, which are temporary files stored on the visitor's device until they leave the Website;
 - **Persistent cookies**, which are stored on the visitor's end device for the time specified in the cookie parameters or until manually deleted.
7. Cookies can be divided into the following categories:
- **Essential cookies:** Essential cookies contribute to the usability of the Website by enabling basic functions such as navigation and access to secure areas of the Website. The Website cannot function properly without these cookies.
 - **Statistical cookies:** Statistical cookies help Website owners understand how different users behave on the Website by collecting and reporting anonymous information (checkbox to select);
 - **Functional cookies:** Functional cookies enable the Website to remember information that changes the appearance or functionality of the Website, e.g., preferred language or region of the User (checkbox to select).
8. We use analytics and similar services that may include third-party cookies. When using the Website, third-party cookies may be used to enable Website functionalities and integration with other websites or to collect anonymous information about Website usage for statistical purposes.
9. This Privacy Policy does not govern the use of third-party cookies. Each third party sets its own rules for using cookies in its privacy policy.
10. You can change how cookies are used by utilizing the Cookiebot cookie management tool – cookie declaration. The tool is available on the Website at <https://reline.ai>.
11. Please note that refusing, deleting, blocking, or restricting the placement of cookies may cause difficulties or even prevent the use of the Website or Electronic Services.

18. Contact Information

RelineAI Sp. z o.o.

ul. Ignacego Mościckiego 1

24-110 Puławy, Poland

Email: contact@relineai.com

Website: <https://reline.ai>