

# PRIVACY POLICY OF PARAFIO.COM

**Effective Date: February 6, 2025**

This Privacy Policy describes how **parafio.com** (the "Service") collects, uses, and discloses your personal information, and outlines your rights regarding your data under applicable laws, including the New York SHIELD Act.

## 1. Data Controller and Service Provider

The primary Data Controllers are the **Parishes and Church Institutions ("Partners")** that use the Service to manage their administrative and pastoral activities.

The Service Provider and Data Processor is:

**ŻyjBardziej Sp. z o.o.** ul. Dantego 5/95, 01-914 Warsaw, Poland Tax ID (NIP): 1182207367  
Email: [kontakt@parafio.com](mailto:kontakt@parafio.com)

The Service Provider processes personal data on behalf of the Partners based on a Data Processing Agreement.

## 2. Information We Collect

We collect information that you provide directly or that is provided by Partners, including:

- **Identifiers:** Name and surname.
- **Contact Information:** Email address and phone number.
- **Pastoral Service Data:** Information related to mass intentions, "wypominki," pastoral visits, and donations.
- **Account Credentials:** Login and access data.
- **Usage Data:** System logs, IP addresses, and cookie data.
- **Third-Party Information:** Information about "Partner Clients" (e.g., parishioners) provided through registrations, forms, or online bookings.

## 3. Business Purposes for Processing

Your information is processed for the following business purposes:

- Providing and maintaining the Service.
- Managing user accounts.
- Providing technical support.
- Ensuring system security and integrity in compliance with the New York SHIELD Act.
- Processing donations and payments.
- Fulfilling legal obligations.

## 4. Consent and Legal Basis

By using the Service, you consent to the collection and use of your information as described in this Policy. For residents of the State of New York, this document serves as a "Notice at Collection" regarding the categories of personal information collected and the purposes for which they are used.

## 5. Third-Party Service Providers

We may share your information with trusted third-party providers who perform services on our behalf, including:

- **Payment Processors:** Tpay, PayU, Stripe.
- **Hosting and Infrastructure:** Amazon Web Services (AWS) EMEA SARL.
- **Authentication Systems:** e-Kuria.
- **Marketing and Analytics Tools:** Brevo, GetResponse, Posthog, Google Analytics, Feathery, Sentry.

We do not sell your personal information to third parties.

## 6. Children's Privacy (COPPA Compliance)

The Service is not intended for children under the age of 13. We do not knowingly collect personal information from children under 13 without verifiable parental consent. If we learn that a child under 13 has provided us with personal information without such consent, we will delete that information immediately.

## 7. Data Retention

We retain your personal information for as long as your account is active or as needed to provide the Service, comply with legal obligations, resolve disputes, and enforce our agreements.

## 8. Your Rights

Depending on your jurisdiction, you may have the following rights:

- The right to access your personal information.
- The right to request correction or deletion of your data.
- The right to object to or restrict certain processing activities.
- The right to data portability.

To exercise these rights, please contact the respective Partner (Parish) with whom you have a direct relationship.

## 9. Cookies and Tracking Technologies

We use cookies to ensure the Service functions correctly, to analyze site traffic, and to remember your preferences. You can manage your cookie preferences through your browser settings.

## **10. Security (New York SHIELD Act Compliance)**

We implement reasonable administrative, technical, and physical safeguards to protect the security, confidentiality, and integrity of your private information. These measures include:

- **Encryption:** Use of SSL/TLS for data transmission.
- **Access Controls:** Restricting access to personal data to authorized personnel only.
- **Monitoring:** Regular threat detection and system backups.

## **11. Changes to This Policy**

We reserve the right to update this Privacy Policy at any time. Changes will be posted on the Service and will take effect 14 days after publication unless otherwise required by law.

## **12. Contact Us**

If you have questions about this Privacy Policy or our data practices, please contact us at [kontakt@parafio.com](mailto:kontakt@parafio.com).