

Website Privacy Notice

Version Date: 31 January 2025

Who we are

This Privacy Policy outlines how Aceex LLC, registered at Domaniewska street, #133 17-19, 02-672, Warsaw, Poland ("we", "us", or "our", "Aceex") collects, uses, and protects your personal data when you visit our website www.aceex.io (the "Site"). We are committed to safeguarding your privacy and ensuring that your personal data is handled responsibly.

Please note that this Privacy Notice does not apply to the extent where we collect and process personal data in the role of a data processor on behalf and in accordance with the instructions of our customers in the course of services provision unless expressly provided otherwise in this Privacy Notice.

Personal Data We Collect

All data related to an identified or identifiable person are personal data. We collect such personal data as **contacts**: your name, email address, company you work at, job position, phone number, and any other information you provide directly to us. We do not collect information automatically when you visit our Site. Our site does not use cookies, web beacons, or similar technologies to analyze user experience.

Category of personal data	Source	Purpose	Legal basis	Storage period
Contacts (your name, email address, company you work at, job position, phone number, country)	We collect this information from you from the contact form filled out at this Site or by negotiating via email, from information publicly posted by you on LinkedIn	To respond to any queries we receive from you, to establish and maintain business relationships (billing and payment transactions under contractual agreements (including with respect to the transmission of invoices triggered by service orders), communications by email and/or via telephone or mobile phone number(s) that you provide to us, or when our staff members are managing customers/ vendors' accounts	1) Legitimate interest 2) Performance of a contract 3) Legal obligation	1) 1 year after your last communication with our company, 2) if an agreement is concluded, for the period of agreement term + 3) retention period prescribed by law

Children's Privacy

Our website is not directed at individuals under sixteen (16). If you are under 16, please do not provide us with any personal data.

How We Use Your Personal Data

Your information may be used in the following ways: 1) to respond to any queries we receive from you, 2) to establish and maintain business relationships: we use your contacts to communicate with you regarding possible requests of transaction/transactions and during the duration of the agreement term, 3) to establish, exercise, or defend a legal claim.

Who Do We Share Your Data With?

We do not sell your personal information. However, we share your information with third-party service providers who assist us:

Google Workspace (Gsuite and other related services) by Google LLC. Service is used to conduct internal and external business communications and to store data. Address: Google Ireland, Gordon House, Barrow Street, Dublin 4, Ireland. [Privacy Policy of Google](#).

Hubspot by Hubspot, Inc. Service is used to conduct customer relations management. Address: Two Canal Park, Cambridge, MA 02141 USA. [Privacy Policy of Hubspot](#).

LinkedIn by LinkedIn Ireland Unlimited Company. Service is used to establish business communications. Address: Wilton Plaza, Wilton Place, Dublin 2, Ireland. [Privacy Policy of LinkedIn](#).

Slack is a service provided by Slack Technologies Limited and is used for internal business communications. The address is Salesforce Tower, 60 R801, North Dock Co. Dublin, Ireland. [Slack's Privacy Policy](#).

DocuSign by DocuSign, Inc. Service is used to e-sign agreements. Address: DocuSign International (EMEA) Ltd. 5 Hanover Quay, Ground Floor, Dublin 2, Republic of Ireland. [Privacy Policy of DocuSign](#).

Acrobat Pro by Adobe Systems Software Ireland Ltd. This service allows users to e-sign and edit documents. Address: 4-6 Riverwalk, Citywest Business Campus, Dublin 24, Ireland. [Adobe's Privacy Policy](#).

Skype by Microsoft Corporation. Service is used for online communications and for sharing text, video, and audio messages) Address: Microsoft Corporation, One Microsoft Way, Redmond, Washington 98052, USA. [Skype's Privacy Policy](#).

Legal Compliance: We may disclose your personal data if it is required by law or in response to reasonable legal requests.

Security of Your Data

We use adequate technical and organizational security measures to protect your data information. For example, we only grant access to your personal data to authorized employees who have committed themselves to confidentiality and data protection obligations. However, no method of transmission over the Internet or electronic storage is 100% secure.

Your Rights

You have the following rights regarding your personal data:

- **The right to be informed about the collection and the use of personal data:**
Aceex must provide information about the processing activities that relate to your data.
- **The right to access personal data:**
You have the right to receive confirmation from Aceex on whether or not Aceex is processing personal data that concerns you and to receive a copy of such data.
- **The right to have inaccurate personal data rectified**, or completed if it is incomplete: You may request that we update, correct or rectify any inaccurate or incomplete personal data.
- **The right to erasure (to be forgotten)** in certain circumstances: You may request that we delete your personal data. However, certain information is strictly necessary to fulfill the purposes defined in this Privacy Notice and may also be required by law. Therefore, such personal data may not be deleted.
- **The right to restrict processing** in certain circumstances: You have the right to restrict the processing of personal data where: 1) you have contested its accuracy, 2) you have objected to the processing and Aceex is considering whether they have a legitimate ground which overrides this processing, 3) Aceex no longer needs the data but you require it to establish, exercise or defend a legal claim.
- **The right to data portability:**
The right to data portability allows individuals to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. This enables you to obtain and reuse your personal data across different services. The right to data portability only applies: 1) to personal data that an individual has personally provided to Aceex, 2) where the processing is based on consent or the performance of a contract, 3) where processing is carried by automated means (i.e. excluding paper files).
- **The right to object to processing** in certain circumstances:
You have the right to object to the processing of your personal data in certain circumstances and have an absolute right to stop your data from being used for direct marketing. The right to object is not absolute and you must give specific reasons why you are objecting to the processing of your data. Aceex can continue processing your personal data if: 1) we can demonstrate compelling legitimate grounds for the processing that override the interests, rights and freedoms of the individual, 2) the processing is for the establishment, exercise or defense of legal claims.
- **The right in relation to automated decision-making and profiling:**
Automated decision-making takes place when an electronic system uses personal information to make decisions without human intervention. Profiling is any kind of automated processing of personal data that involves analyzing or predicting your behavior, habits, or interests. At present, there are no automated decision-making or profiling in use by Aceex.
- **The right to withdraw consent** at any time (where relevant).
- **The right to complain to the data protection authority:**
If you are dissatisfied with the way we have handled your complaint or request and want to make a complaint, you may address it to the respective [data protection authority](#), who is an independent regulator.

Automated decisions

We neither use automated decision-making nor your personal data to automatically assess aspects of your personality (automated profiling).

International Transfers

Aceex transfers your personal data to countries other than the European Union/the European Economic Area, such as transfers to the United States, Singapore, Ukraine, and other countries where the facilities of Aceex's vendors are situated. To the extent that personal data is transferred outside the EU, Aceex ensures compliance with the requirements of the GDPR and implements such measures as verifying [the European Commission's adequacy decision of the intended transfer country's level of protection or standard contractual clauses](#) approved by the European Commission, and Binding Corporate Rules.

Changes to This Privacy Notice

We may update this Privacy Notice from time to time. Any changes will be posted on this page with an updated effective date. We encourage you to review this notice periodically for any updates.

Contact Us

If you have any questions about this Privacy Notice or you have any questions and requests, please contact us at privacy@aceex.io or Aceex Sp. z o.o., ul. Domaniewska, #133 17-19, 02-672, Warsaw, Poland