



# Growth Makers Privacy Policy

## 1. Data Controller

The controller of personal data is GROWTH MAKERS sp. z o.o., with its registered office in Warsaw at Aleja Wilanowska 43/36, 02-765 Warsaw, entered in the register of entrepreneurs of the National Court Register under KRS number 0000814386, NIP 5223173680 and REGON 384976210 (the "Controller" or "Growth Makers").

For any matters relating to personal data, the Controller may be contacted by e-mail at [hello@growthmakers.pl](mailto:hello@growthmakers.pl) or by post at the registered office address of Growth Makers.

This Privacy Policy sets out the rules for the processing of personal data by Growth Makers during its business operations, including in connection with the operation of the website, communications with clients and contractors, the provision of marketing services and ongoing operational activities.

## 2. Scope of Application of the Policy

This Policy applies to users of the growthmakers.pl website, persons contacting Growth Makers via a form or by e-mail, clients, contractors, contact persons acting on behalf of clients and contractors, candidates for employment or cooperation, employees, contractors, B2B collaborators, subcontractors and persons participating in marketing, promotional or communication activities.

This Policy does not supersede separate notices provided in specific processes, promotional campaign terms and conditions, agreements, recruitment privacy notices or documents relating to the entrustment of personal data processing.

## 3. Role of Growth Makers in Processing Operations

Depending on the circumstances, Growth Makers may act either as a controller of personal data or as a processor processing personal data on behalf of a client.

Growth Makers acts as a data controller in particular where it independently determines the purposes and means of the processing of personal data, for example in relation to operating the website, responding to enquiries, maintaining relationships with clients and

contractors, entering into and performing agreements, handling settlements, recruitment, cooperation with subcontractors and marketing its own services.

Growth Makers acts as a processor where it processes personal data on behalf of a client, in accordance with the client's instructions and based on an agreement concluded with that client, including, where applicable, a data processing agreement. In such cases, the client remains the data controller, and this Policy does not replace the client's information obligations towards data subjects.

## 4. Categories of Data Processed

The Controller processes data that are adequate and relevant to the purpose for which they have been collected. Such data may include, in particular: name, surname, business name, position or function, e-mail address, telephone number, correspondence or billing address, PESEL number, NIP number, data necessary to conclude and perform an agreement, billing data, information contained in correspondence, data provided in the contact form, data concerning the preferred service and project budget, data contained in a CV or other application documents, online identifiers and information relating to the use of the website.

In the case of marketing or promotional activities, contests, polls, interviews or influencer marketing activities, the scope of data may also include the name or username of a social media profile, the content of a submission, statement, image and information necessary to administer the campaign or issue a prize. The detailed scope of data may be specified in the terms and conditions of the relevant campaign.

## 5. Purposes, Legal Bases and Retention Periods

| Purpose of processing                                                      | Scope of data                                                                                                                         | Legal basis                                  | Retention period                                                                                                |
|----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------|
| Handling enquiries and the contact form                                    | Data provided in the form, including contact person data, company name, e-mail address, selected service, budget and message content. | Article 6(1)(b) GDPR or Article 6(1)(f) GDPR | For the time necessary to handle the enquiry and thereafter for the period necessary to protect against claims. |
| Preparation of an offer and steps preceding the conclusion of an agreement | Identification and contact data, project information and business needs.                                                              | Article 6(1)(b) GDPR                         | For the duration of negotiations and thereafter until the expiry of the limitation period for claims.           |
| Direct marketing of own services                                           | Contact data, contact history and information                                                                                         | Article 6(1)(f) GDPR                         | Until an objection is raised or the purpose of retaining                                                        |

| Purpose of processing                                         | Scope of data                                                                                                                 | Legal basis                                                                                                                                                          | Retention period                                                                                                                                                               |
|---------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                               | concerning interest in services.                                                                                              |                                                                                                                                                                      | contact data ceases to exist.                                                                                                                                                  |
| Conclusion and performance of an agreement                    | Data of clients, contractors, representatives and contact persons.                                                            | Article 6(1)(b) GDPR and Article 6(1)(f) GDPR                                                                                                                        | For the term of the agreement and until the expiry of the limitation period for claims.                                                                                        |
| Settlements, accounting and tax obligations                   | Identification and settlement data, data included in invoices and accounting documents.                                       | Article 6(1)(c) GDPR                                                                                                                                                 | For the period required by generally applicable law in relation to tax and accounting obligations.                                                                             |
| Cooperation with employees, contractors and B2B collaborators | Identification, contact and address data, PESEL number, contractual, settlement and organisational data.                      | Article 6(1)(b), Article 6(1)(c) and Article 6(1)(f) GDPR                                                                                                            | For the duration of cooperation and for periods resulting from labor law, tax obligations, insurance obligations and limitation periods for claims.                            |
| Recruitment                                                   | Data included in CVs and application documents, contact data and information concerning the recruitment process.              | Article 6(1)(b), Article 6(1)(c), Article 6(1)(a) or Article 6(1)(f) GDPR, depending on the scope of data and the basis for participation in the recruitment process | Until the recruitment process is completed and, where consent is given for future recruitment, for the period specified in the consent, in principle no longer than 12 months. |
| Contests, surveys, interviews and promotional activities      | Participant data, contact data, nickname or social media profile, statement, entry, image and data required to issue a prize. | Article 6(1)(b), Article 6(1)(f) or Article 6(1)(a) GDPR, depending on the nature of the campaign                                                                    | For the duration of the activation and for the period necessary to pursue or defend claims; settlement documents shall be retained in accordance with applicable law.          |
| Website operation and cookies                                 | Online identifiers, technical data and information concerning the use of the website.                                         | Article 6(1)(f) GDPR or consent to the extent required by applicable law                                                                                             | In accordance with the lifespan of cookies and the user's settings.                                                                                                            |

## 6. Contact Form and Communication with Growth Makers

The contact form available on the growthmakers.pl website is intended for submitting enquiries concerning Growth Makers' services. The form may include the personal data of the contact person, the company name, e-mail address, selected service, indicative project budget and any other information provided in the message.

Providing data in the form is voluntary but may be necessary in order to handle the enquiry and prepare a response. Data submitted through the form may also be used for further commercial communication concerning Growth Makers' services, including sending an offer, following up or continuing discussions initiated by the person contacting the Controller.

Where specific laws require consent for a particular electronic or telephone communication channel, marketing communications shall be carried out in compliance with those requirements.

## **7. Clients, Contractors and Contact Persons**

In relationships with clients and contractors, the Controller processes data of natural persons conducting business activity, representatives, proxies, employees and other persons designated for contact or for the performance of an agreement.

Data may be processed for the purposes of conducting negotiations, concluding and performing an agreement, managing a project, ongoing communication, settlements, document archiving and pursuing or defending legal claims.

Where contact person data have been provided by a client or contractor, the Controller processes such data to the extent necessary to maintain the business relationship and to pursue the legitimate interests of the parties to that relationship.

## **8. Employees, Collaborators, Contractors and Subcontractors**

Growth Makers processes data of employees, contractors, B2B collaborators and subcontractors to the extent resulting from the agreements concluded, legal obligations, cooperation arrangements and settlement needs.

The scope of data may include, without limitation, name, surname, address, PESEL number, telephone number, e-mail address, billing data, contractual data and information necessary for the performance of cooperation. This Policy provides general information in this respect and does not replace detailed privacy notices provided in specific HR processes or separate information provided in cooperation, settlement or work organization processes.

## **9. Recruitment**

Where application documents are submitted, Growth Makers processes candidates' data for recruitment purposes. The scope of the data processed depends on the content of the application documents and the requirements of the relevant recruitment process.

Data provided to the extent required by labor law or necessary to take steps prior to entering into an agreement are processed based on the relevant provisions and Article 6(1)(b) or Article 6(1)(c) GDPR. Additional data provided voluntarily may be processed based on consent.

Participation in future recruitment processes requires the candidate's separate consent.

## **10. Data Processed on Behalf of Clients**

In providing marketing, social media, influencer marketing, digital marketing, content strategy, performance marketing, analytics or similar services, Growth Makers may process personal data on behalf of a client.

In such cases, the client remains the data controller and determines the purposes and means of processing. Growth Makers processes data solely based on an agreement, the client's instructions and, where applicable, a data processing agreement.

Data processed on behalf of clients may relate to contact persons, influencers, participants in promotional campaigns, contests, polls, interviews, respondents or other persons covered by the client's marketing activities.

## **11. Contests, Surveys, Interviews and Promotional Activities**

Where Growth Makers organizes or co-organizes contests, polls, interviews, promotional campaigns or similar marketing activities, the scope and rules of data processing may also follow from the terms and conditions of the relevant campaign or from a separate privacy notice.

Data may include name and surname, contact details, the name or username of a social media profile, the content of a submission, a statement, image and information necessary to verify participation, administer the campaign or issue a prize.

If Growth Makers handles such activities for a client as a processor, the client may act as the data controller.

## **12. Cookies**

### **Use of cookies and similar technologies**

The growthmakers.pl website may use cookies and similar technologies. They may be used to ensure the proper functioning of the website, remember user settings, provide selected website functionalities and compile statistics or analyses, where the user has given consent or where permitted by applicable law.

### **Profiling and cookie settings management**

The Controller does not declare that it profiles website users or makes decisions concerning them based solely on automated processing. The user may manage cookies through browser settings or, where available, through the consent management mechanism on the website. Restricting the use of cookies may affect the availability or operation of certain website features.

### **13. Recipients of Data**

Personal data may be disclosed to entities supporting the Controller in conducting its business, solely to the extent necessary to achieve specific processing purposes. Such entities may include providers of IT, hosting, e-mail and cloud tools, including Google Workspace; providers of document signing and document handling tools, including Autenti; accounting firms, tax, legal and other professional advisers; banks, payment operators and entities handling settlements; clients, contractors, subcontractors and collaborators, where necessary for the performance of a project or agreement; and public authorities or other authorized entities where the obligation to disclose data arises under applicable law.

Documents may also be processed and stored in paper form, by storing paper documents at the Controller's office and by transferring accounting documents to the entity providing accounting services.

### **14. Transfers of Data Outside the European Economic Area**

As a rule, the Controller does not intend to transfer personal data outside the European Economic Area ("EEA").

However, if data are transferred outside the EEA in connection with the use of specific IT tools or services provided by technology providers, such transfer shall be carried out only by means of mechanisms required under the GDPR, in particular standard contractual clauses or other appropriate safeguards.

### **15. Profiling and Automated Decision-Making**

The Controller does not make decisions concerning data subjects that are based solely on automated processing, including profiling, where such decisions would produce legal effects concerning them or similarly significantly affect them.

If, in the future, the Controller begins to use solutions involving profiling or automated decision-making within the meaning of the GDPR, data subjects shall receive appropriate information in accordance with applicable law.

## **16. Data Security**

The Controller applies organizational and technical measures designed to protect personal data against unauthorized access, loss, destruction, unauthorized alteration or disclosure.

Access to personal data is granted only to persons who require such access in connection with the performance of their duties or cooperation. Data may be stored in cloud tools, document systems and in paper form at the Controller's office.

After the applicable processing periods have expired, data are deleted or archived in accordance with the applicable rules and legal requirements.

## **17. Rights of Data Subjects**

Data subjects have the rights provided for under the GDPR, including in particular the right of access to their data, the right to rectification, erasure, restriction of processing, data portability, objection to processing, withdrawal of consent at any time and the right to lodge a complaint with the President of the Personal Data Protection Office.

To exercise their rights, data subjects may contact the Controller at [hello@growthmakers.pl](mailto:hello@growthmakers.pl). Withdrawal of consent shall not affect the lawfulness of processing carried out before the withdrawal.

## **18. Amendments to the Privacy Policy**

The Controller may update this Privacy Policy, in particular in the event of changes to the scope of its business, data processing operations, tools used, legal provisions or guidance issued by supervisory authorities.

The current version of the Privacy Policy is available on the Controller's website.