

Privacy Policy – criticalusg.com

1. General Provisions

1.1 The controller of the personal data of users of the online store criticalusg.com (hereinafter referred to as the “Service”) is Human Development Company Łukasz Sporysz-Janiec, with its registered office in Warsaw at: Żupnicza 16 lok. 121 (address), Tax Identification Number (NIP): 826 20 86 768, REGON: 146138478 (hereinafter referred to as the “Controller”).

1.2 This Privacy Policy defines the principles regarding:

- collection and processing of users’ personal data;
- use of cookies;
- exercise of the rights of data subjects;
- protection of personal data.

1.3 The Controller operates in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) and the Personal Data Protection Act.

2. Scope and Categories of Processed Data

2.1 The Controller may collect and process the following data:

- identification data: first name, last name;
- contact data: email address, phone number;
- payment data (in cooperation with payment operators);
- invoicing data (address, tax identification number if the customer requests an invoice);
- technical data: IP address, device identifiers, session data;
- website activity data (e.g., which training courses the customer selects, purchase history).

2.2 Data may be collected:

- during account registration in the Service;
- when placing an order;
- when subscribing to the newsletter;
- through contact forms;
- automatically (e.g., cookies, server logs).

3. Purposes of Data Processing and Legal Basis

3.1 The Controller processes data for the following purposes:

- **Performance of a sales contract:** concluding, performing, and settling contracts for the purchase of online training courses — legal basis: Article 6(1)(b) GDPR.
- **Management of user accounts:** account administration, purchase history, access to training materials — legal basis: contract performance.
- **Handling complaints and inquiries:** contacting users, resolving issues — legal basis: Article 6(1)(b) or (f) GDPR.

- **Marketing and communication:** sending newsletters, informing users about new courses and promotions — legal basis: consent (Article 6(1)(a) GDPR) or legitimate interest (Article 6(1)(f) GDPR).
- **Analytics and Service optimization:** traffic analysis and visitor statistics in order to improve the offer and user experience — legal basis: legitimate interest (Article 6(1)(f) GDPR).
- **Legal obligations:** storing accounting documentation and issuing invoices — legal basis: Article 6(1)(c) GDPR.

3.2 The Controller does not provide for profiling users in a manner resulting in automated decision-making producing legal effects.

4. Data Recipients

4.1 Users' data may be shared with the following categories of recipients:

- payment operators;
- IT service and hosting providers;
- accounting service providers;
- entities cooperating in the provision of training services (e.g., e-learning platforms);
- legal or advisory entities if necessary for the performance of a contract or legal obligation.

4.2 Each data recipient processes personal data based on a data processing agreement (in accordance with Article 28 GDPR), where applicable.

5. Data Retention Period

5.1 Data processed for the performance of a contract will be stored for the period necessary to perform the contract and for the limitation period of any potential claims.

5.2 Accounting data (e.g., invoicing data) will be retained in accordance with applicable regulations (e.g., tax laws).

5.3 Data processed on the basis of consent (e.g., marketing data) will be processed until the user withdraws their consent.

5.4 Technical data (e.g., cookies, server logs) will be stored in accordance with the cookies policy (see below).

6. Users' Rights

6.1 Users have the following rights regarding the processing of their personal data:

- the right of access to data;
- the right to rectify (correct) data;
- the right to erase data ("right to be forgotten");
- the right to restrict processing;
- the right to object to processing (e.g., for marketing purposes);

- the right to data portability (to another controller), where data is processed based on consent or a contract.

6.2 If processing is based on consent, the user has the right to withdraw consent at any time without affecting the lawfulness of processing carried out before withdrawal.

6.3 The user has the right to lodge a complaint with the supervisory authority — the President of the Personal Data Protection Office (UODO) — if they believe that the processing of their data violates applicable laws.

7. Cookies and Tracking Technologies

7.1 The Service uses cookies for the following purposes:

- technical purposes (necessary for the operation of the Service);
- analytical purposes (traffic analytics, statistics);
- marketing / remarketing purposes (ads tailored to the user).

7.2 Types of cookies used by the Service:

- session cookies — expire after the browser is closed;
- persistent cookies — remain on the device until deleted or expired;
- third-party cookies — e.g., Google Analytics, advertising systems.

7.3 Users may manage cookies through their web browser settings (e.g., block or delete cookies). However, restricting or disabling cookies may affect the functionality of the Service.

8. Data Security

8.1 The Controller applies appropriate technical and organizational measures to protect personal data against unauthorized access, loss, destruction, or disclosure. Such measures may include: encrypted connections (SSL), server security, data backup systems, and access restrictions.

8.2 Only authorized persons have access to users' data and process it in accordance with granted permissions.

9. Transfer of Data Outside the European Economic Area (EEA)

9.1 If the Service uses providers located outside the EEA (e.g., hosting or analytics providers), the Controller will ensure appropriate safeguards (e.g., standard contractual clauses) in accordance with GDPR requirements.

9.2 In the event of data transfer to a country whose level of protection has not been recognized by the European Commission as adequate, the Controller shall ensure legal mechanisms protecting the data (agreements, clauses, or other safeguards).

10. Changes to the Privacy Policy

10.1 The Controller reserves the right to make changes to this Privacy Policy.

10.2 Users will be informed of changes by publishing a new version on the Service website and, in the case of significant changes, additionally by email.

10.3 The new version of the policy becomes effective upon publication. In the case of significant changes, a mechanism requiring users to accept the new policy may be considered.

11. Contact

11.1 If you have any questions regarding the processing of personal data, you may contact the Controller at the following email address: kontakt@criticalusg.com