

## Privacy Policy

Pursuant to Article 13(1) and (2) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the "GDPR"), we hereby inform you that:

### 1. Data Controllers

The controllers of your personal data are:

**a) Go 360 Group Jakub Wittbrodt**, a sole proprietorship operating under the business name **Go 360 Group Jakub Wittbrodt**, with its registered address at ul. Bruszevska 23, 03-046 Warsaw, Poland, Tax Identification Number (NIP): 5252300595;

**b) Go 360 Group Sp. z o.o.**, with its registered office at ul. Bruszevska 23, 03-046 Warsaw, Poland, Tax Identification Number (NIP): 5243035403;

The entity indicated as the contractor in the order, quotation, offer, or invoice shall be the contracting party and the controller of personal data processed in connection with the performance of the relevant service.

For matters related to personal data protection, you may contact us at: [contact@go360group.pl](mailto:contact@go360group.pl)

### 2. Purposes and Legal Basis for Data Processing

Your personal data may be processed for the following purposes:

**a) Performance of a contract or taking steps prior to entering into a contract**  
(e.g. responding to inquiries, preparing quotations, processing orders, providing services)  
**Legal basis: Article 6(1)(b) GDPR**

**b) Compliance with legal obligations**  
(e.g. accounting, tax, record-keeping obligations)  
**Legal basis: Article 6(1)(c) GDPR**

**c) Establishment, exercise, or defense of legal claims**  
**Legal basis: Article 6(1)(f) GDPR (legitimate interest of the controller)**

**d) Website traffic analysis, service improvement, statistics, and optimization**  
using analytical tools such as Google Analytics and Microsoft Clarity  
**Legal basis: Article 6(1)(a) GDPR (your consent)**

**e) Marketing of our own services (where applicable)**  
**Legal basis: Article 6(1)(a) GDPR or Article 6(1)(f) GDPR, depending on the communication method**

### 3. Analytical Tools and Cookies

Our website uses cookies and similar technologies to analyze website traffic, improve functionality, and support marketing activities.

#### Google Analytics

We use Google Analytics, a web analytics service provided by Google Ireland Limited.

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Google Analytics helps us understand how visitors interact with our website, including information such as pages visited, time spent on the site, browser type, device information, approximate location, and traffic sources.

### **Microsoft Clarity**

We also use Microsoft Clarity, an analytics service provided by Microsoft Corporation, which helps us analyze user behavior on our website, including click maps, scrolling activity, interactions with website elements, and anonymized session recordings.

To improve our services and website performance, we use Microsoft Clarity to better understand how users interact with our website. By using our website and consenting to analytical cookies, you agree that we and Microsoft may collect and use this data in accordance with applicable data protection laws.

For more information, please refer to:

- Microsoft Privacy Statement
- Google Privacy Policy

These tools may use cookies and similar tracking technologies.

### **4. Data Recipients**

Your personal data may be shared with entities supporting our business operations, including:

- hosting service providers,
- email service providers,
- CRM and IT system providers,
- accounting service providers,
- legal advisors,
- analytics service providers (Google, Microsoft),
- subcontractors involved in delivering our services.

Data is shared only to the extent necessary for the purposes described above.

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

Due to the use of Google and Microsoft services, your personal data may be transferred outside the European Economic Area, particularly to the United States.

Such transfers are carried out based on appropriate legal safeguards in accordance with GDPR, including standard contractual clauses or other legally recognized transfer mechanisms ensuring an adequate level of data protection.

### **6. Data Retention Period**

Your personal data will be retained:

- for the period necessary to perform the contract,
- for the period required by applicable laws (e.g. tax and accounting regulations),
- for the limitation period applicable to potential legal claims,
- in the case of data processed based on consent, until such consent is withdrawn.

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## 7. Your Rights

You have the right to:

- access your personal data,
- rectify your personal data,
- erase your personal data,
- restrict processing,
- data portability,
- object to processing,
- withdraw consent at any time (without affecting the lawfulness of processing carried out before withdrawal).

To exercise your rights, please contact us at: [contact@go360group.pl](mailto:contact@go360group.pl)

## 8. Right to Lodge a Complaint

You have the right to lodge a complaint with the competent supervisory authority if you believe that the processing of your personal data violates GDPR.

For users in Poland, the supervisory authority is the President of the Personal Data Protection Office (UODO).

## 9. Voluntary Provision of Data

Providing personal data is voluntary; however, where such data is necessary for entering into or performing a contract, failure to provide it may make it impossible for us to deliver the requested service.

## 10. Automated Decision-Making

Your personal data is not used for automated decision-making, including profiling within the meaning of GDPR.