

Information regarding personal data processing

The purpose of this document is to provide you with information regarding the processing of your personal data by LeanCode Sp. z o.o. with its seat at Wróbla 8A street, 02-736 Warsaw, NIP: 7010616433, company code KRS: 0000638275, operating the Flitz service available at the website flitz.dev (hereinafter “Flitz” or the “Website”), acting as the controller of your personal data as described below (hereinafter the “Controller”) in a simple, concise and transparent manner. The set of information provided to you here complies with the requirements of the EU Regulation of the European Parliament and of the Council (EU) 2016/679, known as the general regulation on the protection of personal data (hereinafter the “GDPR”).

In order to guarantee the full protection of your data, as well as free access to the necessary information about the processing of your data and your rights, LeanCode Sp. z o. o. provides you with an e-mail address where you can contact the Administrator if you have any questions regarding data protection: iod@leancode.pl.

This document is for information purposes only and does not require any action on your part.

Purposes, scope and legal grounds for processing your personal data

The Controller shall process personal data primarily in order to perform the contract between the Controller and you; providing services to you or taking actions necessary to conclude a contract or start the provision of such services (pursuant to the art. 6, paragraph 1(b) of the GDPR).

In addition, the Controller may also process your personal data in order to fulfill the legal obligations incumbent on it as the Controller (art. 6, paragraph 1(c) of the GDPR), e.g. in the scope of answering the request of public authorities. In other cases, the basis for data processing is the consent you have given (art. 6, paragraph 1(a) of the GDPR). The Controller may process your data on the basis of its legitimate interests (Article 6(1)(f) GDPR), namely:

- proper performance, conclusion and provision of services to counterparties,
- settlement of contracts with counterparties,
- for the purpose of marketing its own products and services,
- if it applies, for the purposes related to the conduct of disputes by the Controller and proceedings before public authorities' bodies.

Where personal data is required to conclude or perform a contract or to respond to an enquiry, providing the required data is a contractual or pre-contractual requirement; failure to provide it may prevent the Controller from concluding or performing the contract, providing the requested services, or responding to the enquiry. Where collection is required by law, providing the relevant data is a statutory requirement. The Controller shall process the personal data collected from you only to the extent necessary to achieve the purposes listed here. In the event that your personal data has not been collected directly from you i.e. in particular, the name, surname, contact details such as e-mail or telephone number and other only necessary for the performance of the contract, the Counterparty or other publicly available sources (KRS, CEIDG, Internet) shall be the source of this data. Providing consent for analytics or marketing cookies is voluntary, and refusing consent does not prevent access to the basic Website.

Recipients of personal data

In the regular course of business, the Controller may transfer your personal data to external recipients (complying with all requirements to ensure the security thereof resulting from the provisions on the protection of personal data), when it turns out to be necessary in business processes, ensuring high-quality services, as well as meeting legal obligations. The above includes the following categories of data recipients:

- contractors, customers, suppliers of the Controller,
- public authorities, occupational medicine service units,
- entities supporting the Controller in running a business,
- providers of legal, advisory, consulting, auditing, accounting, HR and IT services, Controller's contractors,
- providers of website analytics, tag-management and online-advertising services used on the Website — in particular Google LLC (Google Tag Manager, Google Analytics 4, Google Ads) and LinkedIn Corporation / LinkedIn Ireland Unlimited Company (LinkedIn Ads) — to the extent that you have consented to the relevant cookies; see the “Cookies & other technologies” section below for details, including on the transfer of data outside the EEA,
- HubSpot, Inc. — the CRM (customer relationship management) tool the Controller uses to record and manage enquiries you submit through the Website's contact form.

HubSpot, Inc. is based in the United States and may process the data you submit through the contact form outside the European Economic Area. Such transfers are based on appropriate safeguards, in particular the European Commission's Standard Contractual Clauses and, where applicable, HubSpot's certification under the EU-U.S. Data Privacy Framework.

Data processing period

Website technical data is retained for the period configured by the Controller and reasonably necessary to operate and secure the Website, and longer only where needed to investigate an incident or pursue a claim. Contact-form and CRM data is retained until the enquiry is handled and for the duration of any resulting business relationship, and afterwards until applicable statutory and legal-claim limitation periods expire. Contract-related data is retained for the duration of the relationship and until applicable accounting, tax and legal-claim limitation periods expire. Cookies and related analytics or advertising data are retained for the periods shown in the cookie-settings tool and the Controller's configured provider settings. Records of consent may be retained for as long as necessary to demonstrate compliance.

DPO

The Controller has appointed a Data Protection Officer (DPO), who performs the tasks set out in Articles 38 and 39 GDPR independently and acts as a contact point for data-protection matters.

Profiling

Your data may be subject to profiling, in accordance with the provisions of the GDPR. In particular, we use website-analytics and advertising cookies and tags (e.g. Google Analytics 4, Google Ads, LinkedIn Insight Tag) to build a profile of your browsing behaviour and interests, in order to personalise the content and advertisements shown to you and to measure their effectiveness. This profiling does not produce legal effects concerning you or similarly significantly affect you. It is only carried out to the extent you have given the relevant cookie consent,

and you can object to it or withdraw your consent at any time using the cookie-settings tool described in the “Cookies & other technologies” section below.

Your rights

In conjunction with the protection of your personal data, you have a number of rights under the provisions of the GDPR. These include:

1. The right to rectify your data,
2. The right to access your data, including obtaining a copy of it and information about processing processes,
3. The right to request personal data erasure,
4. The right to restrict data processing,
5. The right to transfer data,
6. The right to withdraw your consent,
7. The right to lodge a complaint with a competent supervisory authority.

If you exercise one of your rights, the Controller shall make every effort and take the necessary steps to implement them. We hope that the information provided has helped you become familiar with and understand the processing of personal data by the Controller. We make every effort to ensure its compliance with the law and the best standards that guarantee the protection of your privacy, rights and freedom. Should you have any queries regarding your data, please contact our Data Protection Officer at the e-mail address iod@leancode.pl, or by letter to the address of the registered office of the Controller.

Cookies & other technologies

When you visit our website (flitz.dev), we collect information about how you use those websites. Examples of such information include the Internet Protocol address automatically assigned to your computer each time you browse the Internet, the date and time of your visit, the pages you access and the amount of time you spend on each page, the type of Internet browser you use, your device's operating system and the URL of the website visited immediately before our Website (the referring URL). This information, including your IP address, may itself constitute personal data under the GDPR even though it does not directly reveal your name, and we treat and protect it accordingly. We may also keep records of the type of device being used.

This website uses cookies. LeanCode uses its own cookies as well as cookies from third parties. The cookies are used to remember your settings, traffic metrics, to present you with targeted ads, personalised content, social media features and to track your use of our website for statistical purposes. You can accept or refuse our cookies. Cookies that are not strictly necessary for the operation of the Website — in particular analytics and marketing cookies — are only used on the basis of your consent (art. 6, paragraph 1(a) of the GDPR and Article 399(1) of the Polish Electronic Communications Law (Prawo komunikacji elektronicznej), which you can give or withdraw at any time using the cookie-settings tool available on the Website. You can change or block them within the settings for your Internet browser. Blocking them may however restrict your use of the features of our website. The Portal uses and allows the use of cookies by third parties (e.g. Google Tag Manager, Google Analytics 4 (GA4) and Google Ads, used respectively to manage website tags, measure site usage and deliver/retarget advertising, as well as the LinkedIn Insight Tag (LinkedIn Ads) used for advertising and audience-matching purposes) for statistical and advertising purposes.

Some of these third-party providers — in particular Google LLC and LinkedIn Corporation / LinkedIn Ireland Unlimited Company — may process the data collected through these cookies outside the European Economic Area, including in the United States. Such transfers are based on appropriate safeguards, in particular the European Commission's Standard Contractual Clauses and, where applicable, the provider's certification under the EU-U.S. Data Privacy Framework. You can obtain more information about these safeguards from the Controller's Data Protection Officer at the e-mail address iod@leancode.pl.