# **Privacy policy**

Effective Date: February 19, 2025

Your privacy is very important to us. This Privacy Policy describes how **FlyUp** (hereinafter: "the Company"), located at Kardynała Kominka 23A/11, 44-200 Rybnik, Poland, collects, processes, and protects the personal data of users of the **Business-Oriented Boilerplate** and **GuideBook** products (hereinafter: "Products").

#### 1. Data Controller

Company Name: FlyUp

**Owner:** Aleksander Nowak

Address: Kardynała Kominka 23A/11, 44-200 Rybnik, Poland

Email: <u>alex@businessorientedprogramming.com</u>

#### 2. What Information Do We Collect?

## a) Information Provided Voluntarily

- **Registration Data:** first name, last name, email address (e.g., when signing up for our newsletter or registering on the site).
- Contact Data: information necessary to process orders (e.g., billing details, invoicing address).

## b) Information Collected Automatically

- **Technical Data:** IP address, browser type, operating system, date and time of visits, and other data automatically transmitted by the user's device.
- Cookies and Similar Technologies: used to track user activity, personalize content, and collect statistics regarding the use of the Products.

## c) Data Collected via Analytical Tools

To improve our services, we use:

 Google Analytics – for analyzing website traffic, monitoring user behavior, and collecting statistics regarding the use of our Products.

- **Facebook Pixel** for tracking conversions, personalizing advertisements, and analyzing the effectiveness of marketing campaigns.
- **X Pixel** (or another name if applicable) for monitoring user activity and optimizing our marketing efforts.

## 3. Purpose of Data Processing

We process the collected personal data for the following purposes:

- Order Fulfillment and Service Provision: processing payments, managing user accounts, and delivering the Products.
- **Communication:** sending newsletters, updates about the Products, promotions, and responding to user inquiries.
- **Site Analysis and Optimization:** using the data for statistical analysis, monitoring site traffic, and improving the quality of our services.
- Marketing: personalizing advertising content and remarketing through tools such as Facebook Pixel, Google Analytics, and X Pixel.

# 4. Legal Basis for Processing

We process your personal data on the basis of:

- **Consent:** in cases of newsletter subscription or when you provide consent for marketing data processing.
- **Contract Performance:** necessary for the execution of the sale agreement for the Products and the provision of related services.
- Legitimate Interests: e.g., for statistical analysis and direct marketing, while
  ensuring that your rights and freedoms are respected.

## 5. Sharing of Personal Data

Your data may be shared with:

- Partner Entities: for order fulfillment (e.g., payment systems) or for the provision of services.
- Analytical and Advertising Partners: such as Google, Facebook, and X Pixel, to the extent necessary for conducting analyses and marketing campaigns. Data is shared in an anonymized form or to a limited extent, in accordance with these entities' privacy policies.

 Public Authorities: as required by law, if requested by the relevant authorities.

# 6. Data Security

We implement technical and organizational measures to ensure an appropriate level of data security, protecting your data from unauthorized access, loss, alteration, or disclosure. Despite these measures, no system of data transmission over the Internet or data storage is 100% secure.

### 7. Data Retention

We retain your personal data as follows:

- Newsletter Data: until you unsubscribe.
- Order and Account Data: for the period required by law (e.g., tax regulations) and for as long as necessary to achieve the purposes for which the data was collected.

# 8. User Rights

You have the right to:

- Access your personal data.
- Correct inaccurate or incomplete data.
- Request deletion of your data ("the right to be forgotten").
- · Restrict data processing.
- Request data portability.
- Object to data processing, particularly for marketing purposes.
- Withdraw your consent at any time (this does not affect the lawfulness of processing carried out based on consent before its withdrawal).

To exercise your rights, please contact us at: <u>alex@businessorientedprogramming.com</u>.

## 9. Changes to the Privacy Policy

We reserve the right to make changes to this Privacy Policy. Any significant changes will be announced on our website or communicated electronically. We

recommend that you regularly review this Privacy Policy to stay informed about current data processing practices.

## 10. Contact

If you have any questions or wish to exercise your rights regarding the processing of personal data, please contact:

#### FlyUp - Aleksander Nowak

Kardynała Kominka 23A/11

44-200 Rybnik, Poland

Email: <u>alex@businessorientedprogramming.com</u>