

Welcome!

If you are reading this Privacy Policy, it means that the protection of your personal data matters to you. I take your privacy seriously and have implemented legal and technical measures to protect it. Below I explain how I process your personal data under the GDPR. If you have any questions, please contact me.

PRIVACY POLICY

§1. General information

Pursuant to Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the “GDPR”) (and, where I obtain personal data from other sources, also Article 14 GDPR), I set out below information on how I process your personal data.

This Privacy Policy contains information about the processing of your personal data by me. Detailed information on the use of cookies and other similar technologies is provided in the Cookies Policy, available below.

§2. Who is the Controller of your personal data?

The Controller is Maciej Dylík, carrying on business under the name SeaDraPro Maciej Dylík, VAT: PL5372580410, REGON: 543622066, registered address: Żelazna 51/53, 00-841 Warsaw, Poland. You may contact the Controller by e-mail at: maciej.dylik@seadrapro.com.

§3. For what purposes do I collect your data and how long do I retain it?

I may process your personal data for the following purposes:

1. Communication with you in order to resolve or finalise the matter to which the correspondence relates, including answering questions submitted via the contact form, e-mail message, etc. (Article 6(1)(f) GDPR)

I process your personal data on the basis of the Controller’s legitimate interest consisting in communicating with you (Article 6(1)(f) GDPR). I will retain such data until you object or until the business purpose has been achieved, whichever occurs first. Providing these data is voluntary; however, it is necessary to communicate with you. I may also retain the data for internal archiving purposes on the basis of the Controller’s legitimate interest (Article 6(1)(f) GDPR), until you object or until the business purpose has been achieved, whichever occurs first.

2. Entering into and performance of a contract, and pre-contractual communication in matters concerning the contract (Article 6(1)(b) GDPR)

3. Establishing, pursuing or defending claims as the Controller’s legitimate interest (Article 6(1)(f) GDPR)

4. Compliance with legal obligations incumbent on the Controller, including tax and archiving obligations (Article 6(1)(c) GDPR)

Data necessary to enter into and perform the contract will be retained for the period of contract performance, including the period of exercising rights arising from the contract (Article 6(1)(b) and (f) GDPR). Providing these data is voluntary; however, it is necessary to enter into and perform the contract. Additional data provided, inter alia, to improve the performance of the contract will be retained no longer than until you object or until the business purpose is fulfilled, on the basis of the legitimate interest consisting in customer service (Article 6(1)(f) GDPR).

Your data will be retained for the limitation period for claims arising from applicable provisions, including, in particular, Article 118 of the Polish Civil Code, and thereafter for an additional period of 12 months, on the basis of the Controller's legitimate interest in defending against claims as well as establishing and pursuing claims (Article 6(1)(f) GDPR).

Where processing is necessary for compliance with legal obligations, your data will be retained for the period required by generally applicable laws. Where the data are necessary to comply with the Controller's legal obligations (e.g. issuing and storing invoices; archiving obligations), the retention period is 5 years from the end of the calendar year in which the tax obligation arose, unless provisions provide otherwise (Article 6(1)(c) GDPR). In other cases of compliance with legal obligations – the retention period is determined by the provisions governing those obligations (Article 6(1)(c) GDPR).

Your data may also be archived for internal and statistical purposes until you object or until the business purpose is fulfilled, on the basis of the Controller's legitimate interest (Article 6(1)(f) GDPR).

5. Administration and management of my website and social media pages/groups (including LinkedIn), including communication and directing marketing content (Article 6(1)(f) GDPR)

Data provided for the use of a platform will be retained no longer than until you object or until the business purpose is fulfilled – whichever occurs first – on the basis of the legitimate interest consisting in managing and operating social media pages and communicating with users.

These data will be processed only if you decide to: like the page / join the group / choose the "Follow" option, or otherwise leave your data on the platform managed by me, e.g. by posting an entry or comment. Data will be retained for as long as the page/group exists or until you object, which may occur by unliking/unfollowing, deleting a comment/post, by other means available within the platform/page, or by contacting me directly. Please note that the rules relating to the page/fan page/group are set by the Controller, while the terms of use of the social media platform on which the page/fan page/group is hosted are set by the entity managing that platform.

6. Analytical and statistical purposes (Article 6(1)(a) or (f) GDPR)

I process personal data for analytical and statistical purposes to better understand how you use my services and how I can develop them. Such data may come from various sources – for example from analytics tools (if I use a website or application), from customer service systems, accounting software, booking or communication systems, as well as from statements and reports prepared for my internal purposes.

Where I use cookies or similar technologies, tools other than strictly necessary are activated only after you have given consent (Article 6(1)(a) GDPR) in the cookies banner. Data necessary for proper operation, security and functionality of the portal are processed on the basis of legitimate interest (Article 6(1)(f) GDPR). Where I do not use cookies, analytics data come from my own systems and are processed on the basis of legitimate interest (Article 6(1)(f) GDPR) to produce statistics, analyse trends and improve services.

Where possible, I apply pseudonymisation or anonymisation, and reports are aggregated (e.g. number of enquiries, average contact time, most frequently selected service categories) without the possibility of attributing them to a specific person. I process such data until you object or until the business purpose is fulfilled – whichever occurs first, and where consent is the legal basis – until consent is withdrawn. You have the right to object to processing based on my legitimate interest, and where consent is the legal basis – to withdraw it at any time.

7. Promotion and marketing (Article 6(1)(a) or (f) GDPR)

Where you provide me with your data, in particular in the form of reviews/opinions, such data will be processed on the basis of the Controller's legitimate interest consisting in marketing, in order to improve the quality of services and products and to promote the Controller's services, or based on your consent. These data will be processed for the period necessary to achieve business purposes or until you object (where processing is based on Article 6(1)(f) GDPR) or withdraw your consent (where processing is based on Article 6(1)(a) GDPR) – whichever occurs first. Providing the data is voluntary.

8. Recruitment (Article 6(1)(b) and Article 6(1)(c) GDPR)

Data may be processed for the period necessary for recruitment and entering into a contract (Article 6(1)(b) GDPR). Data required by labour law are processed pursuant to Article 6(1)(c) GDPR in conjunction with Article 22 (1) of the Polish Labour Code. For additional data provided voluntarily – the legal basis is your consent (Article 6(1)(a) GDPR).

Your data may also be processed for future recruitment purposes – based on your consent – for a maximum of 3 years due to the recruitment cycle in the industry (this period is calculated from the end of the year in which the application was obtained). Providing personal data is voluntary, however providing certain data may be necessary to conduct recruitment and/or enter into a contract. Failure to provide such data will result in the inability to undertake the above actions.

9. Processing special categories of personal data (sensitive data) – Article 9(2)(a) GDPR

Special categories of personal data are processed to perform the contract and ensure its proper performance, based on your explicit and voluntary consent (Article 9(2)(a) GDPR), until the business purpose has been achieved or you withdraw your consent, whichever occurs first. Providing such data is voluntary; however, it may be necessary for the proper performance of the contract (provided that providing the data is indicated as necessary for the performance of the Contract).

Where data are processed on the basis of Article 6(1)(f) GDPR for the purposes described above, I verify the need for continued retention every 12 months and delete/anonymise data that are no longer necessary.

§4. To whom may I disclose your personal data?

I disclose your data to other entities only where it is necessary to achieve the processing purposes referred to in §3 and only to the extent necessary to achieve those purposes. As a rule, I collect and process only those data that you have provided to me, subject to data collected automatically or semi-automatically (e.g. online identifiers, system logs, cookies and similar technologies). More information on cookies is provided in §8.

I may disclose your data to processors acting on my instructions. Data are disclosed to other companies/entities only where necessary.

I entrust your data to: hosting provider; IT provider/entity managing the website; accounting/bookkeeping provider; invoicing software provider; cloud services provider; consulting providers; subcontractors; lawyers; courier/postal operators; social media platform; customer service platform; patent database provider; other entities supporting the Controller in achieving the processing purposes. Personal data may also be disclosed by the Controller to entities authorised to receive them under applicable law, including, inter alia, public authorities, common courts and administrative courts, bailiffs' offices, notarial offices, patent offices, etc.

As a rule, data will not be transferred outside the EEA, subject to the situations described below. In other cases, where data are transferred outside the EEA, this will take place on the basis of your consent, standard contractual clauses or other safeguards provided for in the GDPR, subject to meeting the applicable information requirements.

Services provided by Microsoft Ireland Operations Ltd, Avast Software s.r.o., and Google Ireland Ltd are performed by entities established in the EU; however, due to their global nature, data may be transferred to the USA on the basis of standard contractual clauses or other GDPR-compliant safeguards. In any event, these entities have implemented safeguards intended to protect personal data, including standard contractual clauses. Further information on the rules applicable to data processing by the above providers can be found in each provider's privacy policy.

In connection with the use of analytics tools provided by Minesoft Limited, your data may be transferred to the United Kingdom. This transfer is based on the European Commission's adequacy decision for the United Kingdom, confirming an adequate level of personal data protection. Under this decision, the United Kingdom ensures a level of personal data protection equivalent to that of the GDPR, allowing for the secure transfer of data without the need for additional safeguards.

§5. What rights do you have?

Under the GDPR you have the right to: access your personal data; rectify personal data; erase your personal data; restrict processing; object to processing; data portability; and withdraw consent. Withdrawal of consent does not affect the lawfulness of processing carried out prior to withdrawal. Detailed information on these rights is set out in the GDPR, i.e. Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). I respond to your requests as a rule within one month (Article 12(3) GDPR). If you believe that your personal data are processed in breach of applicable law, you have the right to lodge a complaint with the President of the Personal Data Protection Office. In such a case, however, I encourage you to contact me first to clarify your concerns.

§6. Are your personal data subject to profiling?

The Controller analyses personal data in an automated manner using tools provided by software vendors (e.g. statistics, history), solely to the extent that it does not produce legal effects concerning you or similarly significantly affect you, including guaranteed rights and freedoms. The purpose of automated processing is to identify users' preferences (more information on such analysis is provided in §8. Cookies Policy).

§7. Applicable data protection laws

In matters not regulated herein, the relevant provisions of law apply, including European law (in particular the GDPR).

§8. Cookies Policy

When you use the Website, technical information and online identifiers may be collected automatically, in particular via cookies and similar technologies. These data may constitute personal data.

Cookies are computer data, in particular small text files stored on a user's device and dedicated for use of a website. Cookies usually contain the name of the website they originate from, the period for which they are stored on the end device and a unique number.

Cookies are used in particular for the following purposes:

- **technical and functional** – necessary for the proper operation of the Website and its functionalities (e.g. session maintenance, shopping cart, forms),
- **analytical and statistical** – enabling analysis of how the Website is used, which helps improve its structure and content,
- **marketing and advertising** – enabling remarketing and the delivery of personalised advertising content,
- **communication and performance** – supporting chat service, optimisation of website operation and service performance.

The current list of cookies used on the Website, together with information on their categories, providers and retention periods, is available in the consent management tool (the cookies banner visible on the Website).

You can change cookies settings in your web browser yourself. In many cases, the browser allows cookies to be stored by default on your device. Detailed information on the options and ways to manage cookies is available in your browser settings. Failure to consent to cookies may limit the operation of certain Website functionalities.

§9. Social media plug-ins

The Website uses plug-ins, widgets and other social tools provided by portals such as LinkedIn. The rules concerning the processing of personal data are described directly on the websites of those service providers.

§10. Joint controllership

Data processed within LinkedIn are subject to joint controllership by the Controller and LinkedIn Ireland Unlimited Company, Legal Dept. (Privacy Policy and User Agreement), Wilton Place, Dublin 2, Ireland (the "Joint Controller"). Detailed rules on joint controllership, including information on your rights, are provided in LinkedIn's privacy policy. The Controller processes data on the basis of the Controller's legitimate interest, consisting in analysing users' activity and preferences to improve functionalities and services. In matters relating to personal data, you may contact both the Controller and the Joint Controller.



The allocation of responsibilities of the parties as joint controllers is governed by the arrangements referred to in Article 26 GDPR, published in the privacy policies of the relevant platform.

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This Privacy Policy is effective as of 05-02-2026