PRIVACY POLICY OF DiMova

1. Who is the Controller of Your Personal Data?

The controller of your personal data is **FUNDACJA ROZWOJU PRZEDSIĘBIORCZOŚCI „TWÓJ STARTUP”**, with its registered office in Warsaw (registered address: ul. Żurawia 6/12, lok. 766, 00-503 Warsaw, Poland).

This Privacy Policy applies to the services provided by the Foundation through its organised business unit, DiMova, operated by Dmytro Lovtsov.

Contact details: telephone number **+48 577 179 853**, email address: **dimova.kursy@gmail.com**.

2. Why Do We Process Your Personal Data?

A. Performance of a Contract

In connection with the services provided through DiMova, consisting of foreign language instruction, your personal data is processed for the purpose of entering into or performing a contract (Article 6(1)(b) of the General Data Protection Regulation, hereinafter referred to as the “GDPR”).

Your personal data will be retained until the contract has been performed.

B. Marketing and Promotional Purposes

Your personal data may be processed for marketing purposes and to promote products offered by FUNDACJA ROZWOJU PRZEDSIĘBIORCZOŚCI „TWÓJ STARTUP”, based on our legitimate interests (Article 6(1)(f) GDPR).

Your personal data will be processed until you object to such processing.

C. Compliance with Legal Obligations

Your personal data is processed to comply with legal obligations arising from our cooperation (Article 6(1)(c) GDPR).

This purpose includes the legal obligation to retain certain documents for the periods specified by applicable legislation, including:

- The Accounting Act of 29 September 1994 (Journal of Laws of 2017, item 1858);
- The Tax Ordinance Act of 29 August 1997 (Journal of Laws of 1997, No. 137, item 926);

- The Act of 1 March 2018 on Counteracting Money Laundering and Terrorist Financing (Journal of Laws of 2018, item 723).

D. Establishment, Exercise or Defence of Legal Claims

Your personal data may be processed for the purpose of establishing, pursuing or defending legal claims, which constitutes our legitimate interest (Article 6(1)(f) GDPR).

The data will be processed until the applicable limitation period for such claims has expired.

E. Processing Based on Consent

Where you have given your consent, your personal data will be processed within the scope and for the purposes specified in that consent (Article 6(1)(a) GDPR).

The data will be processed until you withdraw your consent.

3. What Personal Data Do We Process?

To enter into a contract, we require you to provide the personal data specified in the contract or order form. If you do not provide this information, we will be unable to enter into the contract or fulfil your order.

We may also request additional optional information that is not necessary for entering into the contract. If you do not provide such information, we may be unable to perform certain activities, such as contacting you by telephone.

During the performance of the contract and provision of our services, we may obtain additional personal data relating to you.

The collection of such personal data results from your use of the services we provide.

4. To Whom May Your Personal Data Be Disclosed?

Your personal data may be disclosed to the following categories of recipients:

A. Public Authorities

Public authorities, to the extent that they receive personal data outside specific proceedings conducted under applicable law, for example in connection with anti-money laundering requirements.

B. Data Processors

Entities that process your personal data on behalf of the Foundation under data processing agreements concluded with the Foundation (referred to as “data processors”).

These may include, among others, beneficiaries of the Foundation, IT specialists, archiving companies and hosting service providers.

C. Independent Data Controllers

External data controllers to whom personal data is disclosed, such as legal advisers and attorneys, courier or postal service providers, and debt purchasers in the event that our invoices are not paid on time.

D. Entities Located Outside the European Economic Area (EEA)

Your personal data may be transferred to entities located outside the EEA only where necessary and subject to appropriate safeguards, primarily through:

a. Cooperation with entities located in countries for which the European Commission has issued an adequacy decision;

b. The application of standard contractual clauses adopted by the European Commission.

The Data Controller will always inform you of any intended transfer of personal data outside the EEA at the time the data is collected.

5. Is Your Personal Data Subject to Profiling?

We inform you that your personal data will not be subject to profiling.

Profiling means the automated analysis of personal data to make predictions about an individual's preferences or future behaviour.

For example, marketing profiling may involve determining which offer is most likely to interest you based on your previous choices.

6. What Rights Do You Have?

Under the GDPR, you have the following rights:

A. Right of Access (Article 15 GDPR)

You have the right to access the personal data that we process about you.

B. Right to Rectification (Article 16 GDPR)

You have the right to request the correction or updating of inaccurate personal data relating to you.

C. Right to Erasure (Article 17 GDPR)

You have the right to request the deletion of your personal data from our systems, also known as the “right to be forgotten”.

If you believe that there are no valid grounds for us to continue processing your personal data, you may request its deletion.

D. Right to Restriction of Processing (Article 18 GDPR)

You have the right to request that we restrict the processing of your personal data to storage or to activities agreed with you in the following circumstances:

- If the personal data we hold about you is inaccurate;
- If we process your personal data unlawfully;
- If you do not wish your personal data to be deleted because you need it for the establishment, exercise or defence of legal claims;
- While your objection to the processing of personal data is being considered.

E. Right to Data Portability (Article 20 GDPR)

You have the right to receive personal data relating to you that we hold on the basis of a contract or your consent in a structured, commonly used and machine-readable format, such as a CSV file.

This right applies where we hold your personal data in electronic form. If your personal data is held exclusively in paper form, this right cannot be exercised.

You may also request that we transfer your personal data directly to another entity.

F. Right to Withdraw Consent (Article 7(3) GDPR)

You have the right to withdraw your consent to the processing of your personal data at any time where such processing is based on your consent.

Withdrawal of consent does not affect the lawfulness of processing carried out before the consent was withdrawn.

You may withdraw your consent by sending an email to **dimova.kursy@gmail.com**.

G. Right to Object (Article 21 GDPR)

You have the right to object to the processing of your personal data where the legal basis for such processing is our legitimate interest.

Following consideration of your objection, we will no longer process the personal data covered by your objection on that legal basis unless we demonstrate compelling legitimate grounds for processing that override your interests, rights and freedoms.

H. Right to Lodge a Complaint

If you believe that the processing of your personal data violates the GDPR, you have the right to lodge a complaint with the competent supervisory authority, namely the **President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych)** in Poland.

7. Contact

If you require additional information regarding the protection of your personal data or wish to exercise any of your rights, please contact us at:

rodo@twojstartup.pl