

# PRIVACY POLICY

## 1. INTRODUCTION

This Privacy Policy explains how **Realtalk Sp. z o.o.** (“**Realtalk**”, “**we**”, “**us**”) collects and uses your personal data when you visit our website <https://realtalk.dev> or otherwise interact with us.

This Privacy Policy forms an integral part of the **Website Terms of Use** and should be read together with our **Cookie Policy**.

We recognise that the protection of personal data is an ongoing responsibility, and we may update this Privacy Policy from time to time. The latest version will always be available on <https://realtalk.dev>.

## 2. WHO WE ARE

The data controller of your personal data is:

**Realtalk Spółka z ograniczoną odpowiedzialnością (Realtalk Sp. z o.o.)**

Address: Cegielniana 4A, lok. 10B, 30-404 Kraków, Poland

KRS: 0000987910

NIP: 5252919892

REGON: 522858919

## 3. WHO THIS POLICY APPLIES TO

In this Privacy Policy:

- “**Visitor**” means any person who visits or browses <https://realtalk.dev>.
- “**Customer**” means any natural person acting on their own behalf or on behalf of a legal entity (including shareholders, beneficial owners, directors, staff members) who contacts us or uses our services.
- “**You**” may refer to either a Visitor or a Customer, depending on the context.

We will do our best to make it clear which category we refer to in each section.

## 4. PERSONAL DATA WE MAY COLLECT

“Personal data” means any information relating to an identified or identifiable natural person.

We may collect and process the following categories of data:

### 4.1. Data you provide to us

**Contact and identification data**, for example:

- name and surname,
- position / role,
- company name,
- e-mail address,
- phone number,
- country of residence,
- any other information you choose to include in a contact form, e-mail or chat.

**Contract / onboarding data** (mainly for Customers), for example:

- date of birth,
- correspondence address,
- invoice / billing data,
- company registration number, tax ID,
- information on shareholders / beneficial owners,
- copies or details of identification documents, if required by law (e.g. AML/KYC in case of regulated services),
- information about services you are interested in or have ordered.

You typically provide this information when:

- filling in “**Contact us**”, demo or inquiry forms on **realtalk.dev**;
- communicating with us via e-mail, phone or other channels;
- entering into or preparing to enter into an agreement with us.

#### **4.2. Data collected automatically (Visitors)**

When you visit <https://realtalk.dev>, we may automatically collect:

- IP address and approximate location,
- device type and browser type,
- operating system,
- date and time of access,
- pages visited, time spent on each page,
- source of traffic (e.g. search engine, referral link).

This information is typically collected using **cookies** and similar technologies for technical, security and analytics purposes. Details are described in our **Cookie Policy**.

#### **4.3. Service and communication data (Customers)**

If you use our services, we may also process:

- information about services you ordered,
- communication history (e-mails, messages, support requests),
- technical logs related to service usage (to the extent necessary for security and support),
- billing and payment-related data (e.g. basic payment details or references from our payment provider – we do **not** store full card data).

#### **4.4. Third-party data sources**

Where permitted by law, we may obtain certain information from:

- publicly available registers and databases (e.g. companies registers, sanctions lists in case of AML/Compliance services),
- our service providers (e.g. payment providers, analytics providers),
- business partners or platforms through which you reach us.

We use such information to verify data, prevent fraud, comply with legal obligations and improve our services.

### **5. PURPOSES AND LEGAL BASES FOR PROCESSING**

We process your personal data only where we have a valid legal basis under the GDPR, such as:

- **Performance of a contract** or steps prior to entering into a contract (Art. 6(1)(b) GDPR);
- **Compliance with a legal obligation** (Art. 6(1)(c) GDPR) – e.g. accounting, AML/CFT where applicable;
- **Legitimate interests** pursued by us (Art. 6(1)(f) GDPR) – e.g. security, service improvement, B2B marketing;
- **Your consent** (Art. 6(1)(a) GDPR) – mainly for certain marketing or cookie-based activities.

Below we explain the main purposes and corresponding legal bases:

#### **5.1. Providing services and communication**

- assessing your inquiry and responding to contact requests;
- entering into and performing agreements;
- providing support and handling your requests;
- managing invoicing and payments.

**Legal basis:** performance of a contract or steps taken at your request prior to entering into a contract; legitimate interests (in the case of B2B pre-contractual communication).

## **5.2. Legal and regulatory obligations**

If applicable to the nature of services we provide (e.g. in payment / compliance projects), we may process personal data in order to:

- comply with AML/CFT, sanctions and other regulatory requirements;
- comply with tax, accounting and archiving obligations;
- respond to lawful requests of authorities.

**Legal basis:** compliance with legal obligations.

## **5.3. Security, fraud prevention and IT administration**

- ensuring security of our website and systems;
- monitoring for suspicious or fraudulent activities;
- protecting our rights, interests and those of our Customers or third parties.

**Legal basis:** legitimate interests (security and fraud prevention).

## **5.4. Analytics and service improvement**

- measuring and improving the performance of our website;
- understanding how Visitors and Customers use our site and services;
- developing new functionalities and services.

**Legal basis:** legitimate interests (improvement of services and website). Where analytics relies on non-essential cookies, we may also rely on your consent, as required by ePrivacy rules.

## **5.5. Direct marketing**

We may use your contact details (name, business e-mail, role, company, country):

- to send updates about our services, industry insights or invitations to webinars/events;
- to inform you about services similar to those you already use or asked about.

**Legal basis:**

- legitimate interests (B2B marketing, provided your interests and rights are not overridden); and/or
- your consent where required (you can withdraw it at any time).

You can opt out of marketing at any time by clicking the “**unsubscribe**” link in our emails or by contacting us directly.

## 6. HOW LONG WE KEEP YOUR DATA

We retain your personal data only for as long as necessary for the purposes described above, or for the period required by applicable law.

Indicative retention periods:

- **Contact / inquiry data:** typically up to 3 years after last contact, unless it leads to a contract.
- **Contract / customer data:** for the duration of the contract and generally up to 6 years after its end (or longer if required by law – e.g. accounting, tax, AML).
- **Technical / analytics logs:** usually for a short period (e.g. up to 1–2 years), unless needed for security or legal claims.

Where we rely on **consent**, we will process your data until you withdraw it or until the relevant purpose ceases to exist.

## 7. USE OF SERVICES BY MINORS

Our website and services are **not directed to persons under 16 years of age**.

We do not knowingly collect personal data from children under 16. If you believe that a child has provided us with personal data, please contact us and we will delete such data.

## 8. DISCLOSURE OF PERSONAL DATA (RECIPIENTS)

We may share your personal data with:

### 1. Service providers (processors)

- IT and hosting providers,
- analytics providers,
- providers of communication and CRM tools,
- payment and invoicing providers,
- professional advisors (law firms, auditors, accountants).

These entities process personal data on our behalf and only according to our documented instructions.

### 2. Group entities / business partners

Where reasonably necessary, we may share data with entities that cooperate with us in providing services (e.g. subcontractors, consultants on the same

project). In such cases, they may act either as independent controllers or processors.

### 3. **Public authorities and regulators**

Where required by law or in response to lawful requests (e.g. law enforcement, courts, supervisory authorities).

### 4. **Business transactions**

In case of restructuring, merger, acquisition, sale of business or similar transaction, personal data may be transferred as part of the transaction in compliance with applicable laws.

We do **not** sell your personal data.

## 9. **INTERNATIONAL TRANSFERS**

Your personal data is primarily processed within the **European Economic Area (EEA)**.

If we transfer personal data outside the EEA, we will ensure that an adequate level of protection is in place, for example by:

- relying on an adequacy decision by the European Commission; or
- using Standard Contractual Clauses (SCCs) or other appropriate safeguards.

You may contact us for more information about such transfers.

## 10. **YOUR RIGHTS UNDER GDPR**

You have the following rights in relation to your personal data:

- **Right of access** – to obtain confirmation whether we process your data and to receive a copy of it;
- **Right to rectification** – to have inaccurate or incomplete data corrected;
- **Right to erasure** – to request deletion of your data in certain circumstances;
- **Right to restriction of processing** – to request that we temporarily limit the processing;
- **Right to data portability** – to receive data you provided to us in a structured, commonly used format and to transmit it to another controller where processing is based on consent or contract and carried out by automated means;
- **Right to object** – to object to processing based on our legitimate interests or for direct marketing;
- **Right to withdraw consent** – where processing is based on consent, you can withdraw it at any time (this will not affect processing carried out before withdrawal).

To exercise your rights, please contact us at: **info@realtalk.dev**.

You also have the right to lodge a complaint with the competent supervisory authority, in particular in the EU Member State of your habitual residence, place of work, or place of the alleged infringement.

For Realtalk Sp. z o.o., the competent authority in Poland is:

**President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych – UODO).**

## **11. COOKIES**

We use cookies and similar technologies on <https://realtalk.dev> to:

- ensure website functionality,
- improve user experience,
- perform analytics.

Details regarding the types of cookies and how to manage them are set out in our separate **Cookie Policy**, available on the website.

## **12. SECURITY**

We use appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

However, no method of transmission or storage is completely secure, and we cannot guarantee absolute security.

## **13. CHANGES TO THIS PRIVACY POLICY**

We may update this Privacy Policy from time to time. Any changes will be published on <https://realtalk.dev> and will apply from the date of publication.

Where appropriate, we may inform you about changes by e-mail or by a notice on our website.

## **14. DATA PROTECTION CONTACT**

If you have any questions, concerns or requests regarding this Privacy Policy or our data protection practices, you can contact us at:

**info@realtalk.dev**

If a formal DPO is appointed in the future, you can later update this section with their contact details.