

Privacy Policy

Effective date: 7 September 2026 · Version 1.0

Draft template notice: This document has been prepared as a standard, GDPR-oriented privacy policy for Scale2global Sp. z o.o. based on the information available about the website and its data practices. It is provided as a starting draft and has not been reviewed by a qualified lawyer or data protection officer. Before publishing it, please have it reviewed by legal counsel to confirm it accurately reflects your actual data processing activities, vendors and retention practices.

1. Who We Are

This Privacy Policy explains how Scale2global Sp. z o.o. ("Scale2global", "we", "us", "our") collects, uses, discloses and protects personal data of visitors to our website and individuals who contact us in connection with our technology commercialization and EIC funding advisory services (the "Website", the "Services").

DATA CONTROLLER

Scale2global Sp. z o.o.

ul. Bajeczna 4, lok. 4, 03-681 Warsaw, Poland

Entered in the National Court Register (KRS) under no. 0000588079

EU VAT ID: PL9512401675

Email: contact@scale2global.pl

We process personal data in accordance with Regulation (EU) 2016/679 (the "General Data Protection Regulation" or "GDPR") and applicable Polish law, in particular the Act of 10 May 2018 on the Protection of Personal Data.

2. What Personal Data We Collect

We collect personal data in the following ways:

2.1 Information you provide directly

- **Contact / inquiry form:** full name, company name, job title/position, business email address, technology or sector, project type, target market, technology stage, description of your challenge, funding objective, and any project description or other information you choose to include in the free-text fields.
- **Direct email correspondence:** your name, email address and any information you include when you email us at contact@scale2global.pl.

2.2 Information collected automatically

- **Usage and analytics data:** via Google Analytics, we collect standard web analytics information such as approximate location (derived from IP address), device and browser type, pages visited, referral source, time spent on the site and general navigation behaviour. See our [Cookie Policy](#) for details of the specific cookies used and how to manage your preferences.
- **Server and hosting logs:** the Website is hosted via GitHub Pages, which may automatically log standard technical information (such as IP address and request timestamps) for security and operational purposes, in accordance with GitHub's own privacy practices.
- **Web font requests:** the Website loads typefaces from Google Fonts. Your browser makes a direct request to Google's servers to retrieve these fonts, which may transmit your IP address to Google.

We do not knowingly collect any special categories of personal data (e.g. health, biometric or religious data) through the Website, and we ask that you do not include such information in the inquiry form or your correspondence with us.

3. Why We Use Your Data and Our Legal Basis

Purpose	Legal basis (GDPR Art. 6(1))
Responding to your inquiry and discussing a potential engagement	(b) Necessary to take steps at your request prior to entering into a contract
Performing and administering an advisory engagement with your organisation	(b) Performance of a contract
Operating, securing and improving the Website	(f) Legitimate interest in maintaining a functional and secure website
Website analytics (Google Analytics)	(a) Consent, obtained via the cookie banner before non-essential cookies are set
Complying with legal, tax and accounting obligations	(c) Compliance with a legal obligation
Defending or pursuing legal claims	(f) Legitimate interest in protecting our legal position

4. Who We Share Data With

We do not sell personal data. We share personal data only with the following categories of recipients, and only to the extent necessary:

- **Service providers / processors** who support our operations, such as our email provider, website hosting provider (GitHub, Inc.), and Google LLC (for Google Analytics and Google Fonts), each acting under appropriate data processing terms.
- **Professional advisers** such as our accountant, auditor or legal counsel, where necessary for our business operations.
- **Public authorities** where we are required to disclose information to comply with a legal obligation, court order or lawful request.

- **A successor entity** in the event of a merger, acquisition or sale of assets, subject to appropriate safeguards.

We do not share the details of prospective client inquiries with other clients or third parties for their own marketing purposes.

5. International Data Transfers

Some of our service providers (including Google LLC, in connection with Google Analytics and Google Fonts) may process data outside the European Economic Area, including in the United States. Where this occurs, we rely on the relevant provider's compliance with an adequacy mechanism recognised under GDPR, such as the European Commission's Standard Contractual Clauses, or another lawful transfer mechanism. You may contact us for further information about the safeguards applied to a specific transfer.

6. How Long We Keep Your Data

Category	Retention period
Inquiry / contact form submissions that do not lead to an engagement	Up to 24 months from submission, then deleted or anonymised
Client and engagement records	Duration of the engagement plus the period required by Polish tax and accounting law (generally 5 years from the end of the relevant fiscal year)
Analytics data (Google Analytics)	As configured in our Google Analytics account, typically 14–26 months
Correspondence	Up to 36 months, unless a longer period is required for legal or contractual reasons

7. Your Rights

Subject to the conditions set out in the GDPR, you have the right to:

- **Access** the personal data we hold about you;
- **Rectify** inaccurate or incomplete personal data;
- **Erase** your personal data ("right to be forgotten"), in certain circumstances;
- **Restrict** the processing of your personal data;
- **Object** to processing based on our legitimate interest, including for direct marketing;
- **Data portability**, i.e. to receive your data in a structured, commonly used, machine-readable format;
- **Withdraw consent** at any time, where processing is based on consent (e.g. analytics cookies), without affecting the lawfulness of processing before withdrawal; and
- **Lodge a complaint** with a supervisory authority, in particular the Polish Personal Data Protection Office (Urząd Ochrony Danych Osobowych, UODO), ul. Stawki 2, 00-193 Warsaw, Poland, or the supervisory authority of your own EU member state.

To exercise any of these rights, please contact us at contact@scale2global.pl. We will respond within one month, as required by the GDPR.

8. Security

We apply appropriate technical and organisational measures designed to protect personal data against unauthorised access, loss, misuse or alteration, proportionate to the nature of the data we process. However, no method of electronic transmission or storage is completely secure, and we cannot guarantee absolute security.

9. Children's Privacy

The Website and Services are directed at business professionals and are not intended for individuals under the age of 16. We do not knowingly collect personal data from children.

10. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or for legal, operational or regulatory reasons. The "Effective date" above indicates when this version was last revised. Material changes will be indicated on this page.

11. Contact Us

Scale2global Sp. z o.o.
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Email: contact@scale2global.pl