

# PRIVACY POLICY

**AlphaPulse – Alpha Data Analytics PSA**

**Effective Date:** 18.04.2026

## 1. Data Controller

The data controller responsible for your personal data is:

**Alpha Data Analytics Prosta Spółka Akcyjna**

Bociana 4A, 31-231 Kraków, Poland

Email: [info@adalytica.com](mailto:info@adalytica.com)

Phone: +48 533 488 459

EU VAT: PL6772474327

KRS: 0000953192

## 2. Scope of This Policy

This Privacy Policy explains how we collect, use, store, and protect your personal data when you use the AlphaPulse platform (“Service”).

## 3. Personal Data We Collect

We collect and process the following categories of personal data:

### 3.1 Account Information

- Email address
- First name and last name
- Password (stored in encrypted/hashed form)
- Account status (e.g. activation status)
- Authentication method (e.g. Google login indicator)

### 3.2 Technical and Usage Data

- IP address (last login IP)
- Locale / language preferences
- Landing page (URL from which you registered)
- Account creation date
- Internal account flags (e.g. administrative status)

### 3.3 Communication Data

- Messages or comments you provide
- Newsletter subscription preference

## 4. Purpose of Data Processing

We process your data for the following purposes:

- To create and manage your account
- To provide access to the Service and its features
- To process subscriptions and payments
- To communicate with you regarding your account or Service updates
- To improve the Service and user experience
- To ensure security and prevent abuse
- To send newsletters or product updates (if you opted in)

## 5. Legal Basis for Processing (GDPR)

We process your personal data based on:

- **Contract performance** – to provide the Service you subscribed to
- **Legitimate interest** – to operate, secure, and improve the Service
- **Consent** – for analytics cookies, marketing communications, and optional processing
- **Legal obligation** – for accounting and regulatory compliance

## 6. Consent

Where required by applicable law, we obtain your consent before processing certain types of personal data.

### 6.1 Consent for Cookies and Analytics

- We request your consent before using non-essential cookies and tracking technologies, including Google Analytics.
- You may accept, reject, or customize your preferences via the cookie banner.
- You may withdraw your consent at any time by adjusting your cookie settings or browser configuration.

### 6.2 Consent for Marketing Communications

- Where you have opted in to receive communications (e.g. newsletters), we process your data based on your consent.
- You may withdraw your consent at any time by:
  - clicking the unsubscribe link in emails, or
  - contacting us at **info@adalytica.com**

### 6.3 Withdrawal of Consent

- Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.
- Certain features of the Service may be limited if consent is withdrawn.

## 7. Payment Processing

Payments are processed by Stripe.

We do **not store full payment card details**. Payment information is handled directly by Stripe in accordance with their privacy and security standards.

## 8. Data Sharing

We do not sell your personal data.

We may share your data with:

- Payment processors (e.g. Stripe)
- Hosting and infrastructure providers
- Analytics providers, including Google Analytics
- Security and fraud prevention providers

All third parties are required to process data in compliance with applicable data protection laws.

## 9. International Data Transfers

Your personal data may be transferred to and processed outside the European Economic Area (EEA).

Where such transfers occur, we ensure appropriate safeguards are in place, including Standard Contractual Clauses approved by the European Commission.

## 10. Data Retention

We retain personal data:

- For as long as your account is active
- As necessary to fulfill contractual obligations
- As required by applicable laws (e.g. tax and accounting regulations)

After account deletion, data may be retained for a limited period where necessary for legal or legitimate business purposes (e.g. fraud prevention).

## 11. Your Rights (GDPR)

You have the right to:

- Access your personal data
- Rectify inaccurate or incomplete data
- Request deletion of your data
- Restrict or object to processing
- Data portability
- Withdraw consent at any time

To exercise your rights, contact: **info@adalytica.com**

You also have the right to lodge a complaint with a supervisory authority.

## **I 2. Data Security**

We implement appropriate technical and organizational measures to protect your data, including:

- Encryption and secure password hashing
- Access controls and authentication mechanisms
- Secure infrastructure and monitoring

However, no system can guarantee absolute security.

## **I 3. Cookies and Tracking Technologies**

We use cookies and similar technologies to:

- Maintain user sessions
- Ensure proper functionality of the Service
- Analyze usage and improve performance

We use Google Analytics to understand how users interact with the Service, including:

- Pages visited
- Time spent on the platform
- Navigation patterns

Google Analytics may collect information such as your IP address and device/browser details. We apply privacy-enhancing measures such as IP anonymization where possible.

You can control cookie usage through your browser settings or the cookie consent banner.

## **I 4. Newsletter and Communications**

If you opt in to receive communications:

- You may receive product updates, insights, or marketing messages
- You can unsubscribe at any time via the link in emails or by contacting us

## **I 5. Account Deletion**

You may request deletion of your account at any time by contacting:

**info@adalytica.com**

Upon deletion:

- Your account will be deactivated
- Personal data will be deleted or anonymized, unless retention is required by law

## **I 6. Changes to This Policy**

We may update this Privacy Policy from time to time.

Updated versions will be published on our website with a revised effective date.

## **17. Contact**

For any questions regarding this Privacy Policy:

Email: **info@adalytica.com**

Phone: +48 533 488 459