

PRIVACY POLICY

Last updated: 9th October 2026

1. Who we are

This Privacy Policy explains how OnScale sp. z o.o. (“**OnScale**”, “**we**”, “**our**” or “**us**”) processes personal data in connection with the website available at <https://onscale.org> (the “**Website**”) and the services available through or in connection with the Website (the “**Services**”).

The controller of your personal data is:

OnScale sp. z o.o.

ul. Hoża 86 lok. 410

00-682 Warsaw, Poland

KRS: 0001254049

NIP: 7011322892

e-mail: contact@onscale.org

You may contact us at the e-mail address above in all matters relating to privacy and the processing of your personal data.

2. What personal data we collect

Depending on how you use the Website and the Services, we may process the following categories of personal data:

- i. Website and technical data, such as IP address, browser type, device information, operating system, referring URL, pages viewed and information about how you use the Website;
- ii. contact and enquiry data, such as your name, e-mail address and information included in messages, forms or enquiries sent to OnScale;
- iii. meeting booking data, including your name, e-mail address, selected date and time and any information you provide when booking a meeting through Cal.com;
- iv. newsletter data, in particular your e-mail address and information relating to your subscription or unsubscribe request;
- v. account and Application Workspace data, including your name, e-mail address, Google account information used for sign-in, account and session information, information provided in application forms, drafts, document requests, quotes and correspondence with OnScale;
- vi. documents and information uploaded by you, including identification, corporate, ownership, representation or compliance-related information necessary in connection with services requested from OnScale;
- vii. Team Chat data, including messages, files and other information exchanged with members of the OnScale team.

3. Why we process your data

We process your personal data for the following purposes:

Providing the Website and Services

We process personal data to operate the Website, create and maintain user accounts, provide access to the Application Workspace and Team Chat, process forms and requests, arrange meetings and otherwise provide the Services requested by you.

Where the processing is necessary to provide a Service or take steps at your request before entering into a contract, the legal basis is Article 6(1)(b) GDPR.

Responding to enquiries and communicating with you

We process your contact details and correspondence in order to respond to enquiries, communicate with you and manage our relationship with you.

Depending on the circumstances, the legal basis is Article 6(1)(b) GDPR or our legitimate interest under Article 6(1)(f) GDPR in responding to communications and managing our business relationships.

Newsletter and marketing communications

We process your e-mail address to provide the Newsletter you have subscribed to and, where required by applicable law, to send marketing communications based on your consent.

You may unsubscribe at any time using the unsubscribe link included in the Newsletter.

Analytics and improvement of our Website and Services

If you consent to optional analytics technologies, we may process information about your use of the Website and Services in order to understand how they are used, measure performance and improve functionality.

The legal basis for such processing is your consent under Article 6(1)(a) GDPR.

You may withdraw your consent at any time through the Cookies Settings available on the Website.

Security and legal compliance

We may process personal data where necessary to protect the security of the Website, Services and our IT systems, prevent abuse or fraud, comply with legal obligations and establish, exercise or defend legal claims.

The legal basis is, depending on the circumstances, Article 6(1)(c) GDPR or our legitimate interest under Article 6(1)(f) GDPR.

4. Personal data about other persons

In connection with services requested through the Application Workspace or otherwise, you may provide us with personal data concerning other persons, such as directors, shareholders, beneficial owners, employees or representatives.

Where we obtain personal data from someone other than the data subject, we process it only to the extent necessary for the relevant service, legal obligation or legitimate business purpose.

Such data may be provided to us by a User or by a company or other organisation acting through the User.

If you provide us with personal data concerning another person, you should ensure that you are entitled to provide such data.

Where required by Article 14 GDPR, we will provide the relevant privacy information directly to the person concerned within the period required by law, unless an applicable exception applies.

5. Who we share your data with

We may share personal data with service providers and other recipients where this is necessary to operate the Website or provide the Services.

Depending on the Service used, these recipients may include:

- i. Supabase – authentication, user sessions, database and Application Workspace infrastructure;
- ii. Google – Google sign-in and Google Analytics;
- iii. Microsoft – Microsoft Clarity;
- iv. PostHog – product analytics;
- v. Resend – server-side delivery of e-mails;
- vi. Cal.com – meeting booking and scheduling;
- vii. Vercel – hosting of the Website, web application and API infrastructure;
- viii. other IT, hosting, security and technical service providers;
- ix. professional advisers, corporate service providers, local partners, public authorities or other entities involved in providing services requested by a User, where necessary.

Some recipients act as processors on our instructions, while others may act as independent controllers in respect of their own processing activities.

We do not sell personal data.

6. International transfers

Our primary application database is hosted through Supabase in the European Union. However, some of our other service providers may process or access personal data from countries outside the European Economic Area (“EEA”).

Where personal data is transferred outside the EEA, we rely on a lawful transfer mechanism, such as:

- i. a European Commission adequacy decision;
- ii. the European Commission's standard contractual clauses; or
- iii. another mechanism permitted under applicable data protection law.

You may contact us at contact@onscale.org for further information about safeguards applied to international transfers.

7. How long we keep your data

We retain personal data only for as long as necessary for the purpose for which it was collected and thereafter where continued retention is necessary to comply with legal obligations or establish, exercise or defend legal claims.

In particular:

- i. account and Application Workspace data is retained for the duration of the account. If a User deletes their account, data associated with the account is deleted from our active systems within 30 days. Residual copies may remain in backups for up to 90 days before being automatically deleted;
- ii. if an account remains inactive for 24 months, we may delete the account and the associated data after giving the User at least 30 days’ prior notice. If the User resumes using the account during that period, the account will not be deleted;
- iii. Team Chat history is generally retained for the duration of the User’s account and is deleted together with the account in accordance with the retention periods described above;
- iv. Newsletter data is retained for the duration of the subscription, while limited information concerning an unsubscribe request may be retained to ensure that the request is respected;

- v. enquiry and correspondence data is retained for the period necessary to handle the matter and, where appropriate, for the period necessary to defend against potential claims;
- vi. data processed on the basis of consent is no longer processed for that purpose after the consent is withdrawn, unless another lawful basis permits continued retention.

8. Cookies and analytics

The Website uses cookies, local storage and similar technologies.

Certain technologies are necessary for the Website and Services to function correctly. These include technologies used to maintain signed-in sessions, support authentication, enable navigation following sign-in and remember the User's cookie preferences.

Based on the current configuration, these include:

- i. Supabase – signed-in session and Google sign-in;
- ii. OnScale – information necessary to redirect a User after sign-in;
- iii. OnScale local storage – storing the User's analytics consent preference.

The Website may also use optional analytics technologies, including:

- i. Google Analytics – Website analytics;
- ii. Microsoft Clarity – analytics and session recordings;
- iii. PostHog – product analytics;
- iv. Vercel Analytics – if enabled.

Optional analytics technologies are activated only after the User has provided the required consent.

You may change your choice at any time through Cookies Settings available in the Website footer.

Refusing optional analytics technologies does not prevent the use of the basic functions of the Website.

9. Your rights

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

- i. access your personal data;
- ii. request correction of inaccurate or incomplete data;
- iii. request deletion of your data;
- iv. request restriction of processing;
- v. receive personal data you have provided to us in a structured, commonly used and machine-readable format, where the right to data portability applies;

- vi. object to processing based on our legitimate interests;
- vii. withdraw your consent at any time where processing is based on consent;
- viii. object at any time to processing of personal data for direct marketing purposes.

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

You also have the right to lodge a complaint with the competent supervisory authority. In Poland, this is the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych). To exercise your rights, please contact us at contact@onscale.org.

10. Automated decision-making, security and changes

The Application Workspace may generate automated recommendations based on information provided by the User.

The recommendations are currently generated using predefined rules. Depending on the information and answers provided by the User, the Application Workspace may suggest a particular service, solution or course of action.

Such recommendations are non-binding and are provided for preliminary informational purposes only. They do not produce legal effects or similarly significantly affect the User. No binding decision concerning the User is made solely on the basis of an automated recommendation. The User may discuss the recommendation with the OnScale team before deciding whether to proceed with a particular service.

The current recommendation system does not use artificial intelligence.

OnScale implements appropriate technical and organisational measures designed to protect personal data against unauthorised access, loss, alteration or disclosure.

We may update this Privacy Policy where necessary due to changes in law, the Website, the Services or the technologies we use.

The current version of the Privacy Policy will always be available on the Website together with the date of its last update.

If you have any questions about this Privacy Policy or the processing of your personal data, please contact us at contact@onscale.org.