

Privacy and Cookies Policy

Publication Date: 14.10.2025

We take the protection of your personal data very seriously. This Privacy Policy applies to the personal data we process in connection with the activities of **Kulturka Hub** and the website available at www.madeinkulturka.art.

This document has been prepared in accordance with applicable law, including **Regulation (EU) 2016/679 of the European Parliament and of the Council** of 27 April 2016 (GDPR) and the **Polish Personal Data Protection Act** of 10 May 2018.

The content of this Privacy Policy may change at any time. We will always inform you about any updates and publish the current version of the document.

We cooperate only with entities that ensure a high level of personal data protection.

Contact Us

If you have any questions regarding your subscription, purchases, or use of the Kulturka Hub platform, please contact us:

 **Email:** madeinkulturka@gmail.com

 **Phone:** +48 530 858 015

Data Controller

The administrator of your personal data is:

Made in Kulturka Aleksandra Charabin

Registered office: Monte Cassino 27/25, 65-561 Zielona Góra, Poland

NIP: 9291768850 **REGON:** 081175819

What does this Privacy Policy include?

In this document, you'll find information about:

- the principles of processing your personal data,
- the purposes for which we process it,
- the legal grounds that allow us to do so,
- the tools we use on www.madeinkulturka.art and within Kulturka Hub,
- recipients of your data,
- your rights.

What data do we process, for what purpose, and on what legal basis?

Contact with you – data: name, surname, email address, phone number, message content;
Legal basis: Article 6(1)(a) and (f) GDPR.

Registration and use of the platform – data: name, surname, email, login, phone number, invoicing details;
Legal basis: Article 6(1)(b) GDPR.

Orders and payments – data: name, surname, address, phone number, email, company details (VAT number), payment information;
Legal basis: Article 6(1)(b) GDPR.

Invoices and tax obligations – data: name, surname, address, VAT number, business details;
Legal basis: Article 6(1)(c) GDPR.

Complaints and withdrawals – data: name, surname, address, email, phone number, bank account number, content of the complaint;
Legal basis: Article 6(1)(b) and (c) GDPR.

Marketing and newsletter – data: name, email;
Legal basis: Article 6(1)(a) and (f) GDPR.

Archival and evidential purposes – data: all data provided as part of using our services;
Legal basis: Article 6(1)(f) GDPR.

Pursuing or defending claims – data: all of the above;
Legal basis: Article 6(1)(f) GDPR.

Website management and traffic analysis – data: IP address, website activity;
Legal basis: Article 6(1)(f) GDPR.

Cookies – data: IP address, user behavior on the website;
Legal basis: Article 6(1)(a) GDPR.

Social media profiles – data: publicly shared profile information (name, nickname, photo, comments, likes);
Legal basis: Article 6(1)(f) and (a) GDPR.

Compliance with data protection obligations – data required by law;
Legal basis: Article 6(1)(c) GDPR.

Comments and reviews on the website – data: name, email, content of the review;
Legal basis: Article 6(1)(a) GDPR.

Your Rights

You have the right to:

- access your data and information,
- rectify your data,
- erase your data (“right to be forgotten”),
- restrict processing,
- object to processing,
- data portability,
- lodge a complaint with the President of the Personal Data Protection Office (UODO),
- withdraw consent at any time.

Data Recipients

Your data may be shared with entities that help us operate the platform and website.

Within the EEA:

- **Wix.com Ltd.** – hosting and technical services provider.

Outside the EEA:

- **Google LLC** – Google Analytics, YouTube (traffic analysis, video embedding).
- **Meta Platforms, Inc.** – Facebook Pixel, Instagram (marketing and analytics).
- **Pinterest Inc.** – Pinterest Tag (marketing tool).
- **TikTok Technology Limited / TikTok Inc.** – TikTok Pixel (marketing tool).
- **Microsoft Corporation** – Microsoft Clarity (user behavior analytics).
- **Manychat, Inc.** – social media automation tool (e.g., Instagram, Messenger).

When transferring data outside the EEA, we cooperate only with entities that use appropriate data protection mechanisms compliant with EU standards (e.g., Standard Contractual Clauses).

Requirement to Provide Data

Providing data is voluntary, but in many cases necessary:

- to conclude and perform a contract,
- to establish contact,

- to fulfill tax obligations.
Failure to provide data may prevent us from delivering our services.

Automated Decision-Making and Profiling

Your data is **not** subject to automated decision-making that would produce legal effects or significantly affect you.

However, tools used on our website and within Kulturka Hub may analyze user behavior (profiling) to improve our services and tailor displayed content.

This profiling is based on anonymous data, such as:

- location,
- age,
- interests,
- on-site activity.

Profiling has **no legal or significant impact** on you.

Data Retention Periods

We process your data only for as long as necessary to fulfill the purpose for which it was collected. After that, the data will be irreversibly deleted or anonymized.

Examples:

- **3 or 6 years + 1 year** – for claims and legal defense (depending on the parties' legal status).
- **Until objection or purpose fulfillment** – for data processed on legitimate interest.
- **Until outdated or no longer needed** – for administrative and analytical data.
- **Until consent withdrawal** – for data based on your consent (e.g., newsletter, cookies).

Social Media

We manage profiles on Facebook, Instagram, YouTube, Pinterest, and TikTok.

Your data (name, nickname, photo, comments, likes, and other shared info) may be processed to:

- manage our profiles,
- build the Kulturka Hub community,
- interact with followers.

Each platform's privacy policy governs data processing. Please review their policies.

Newsletter

If you subscribe to our **Kulturka Hub newsletter**, we will process your data to send you:

- updates on new educational materials,
- inspirational and artistic content,
- promotions and event information.

Your data (name and email) is processed based on your consent (Art. 6(1)(a) GDPR). We use **WIX.COM** to manage the newsletter, which ensures GDPR compliance.

You can unsubscribe anytime via the “**Unsubscribe**” link in every email.

Withdrawing Consent

If processing is based on your consent, you can withdraw it at any time — e.g., by emailing madeinkulturka@gmail.com.

Withdrawal does not affect the lawfulness of prior processing. It only applies to future actions.

Comments and Reviews

You can add comments and reviews on our website voluntarily. To do so, please provide:

- name or nickname,
- email address,
- comment/review content.

By posting a comment, you consent to the processing and publication of your data.

We kindly ask you to follow principles of mutual respect. We reserve the right to moderate or remove comments that:

- are offensive or vulgar,
- contain unrelated advertising,
- violate others' rights.

Cookies and Tools Used on the Website

Like most websites, we use **cookies** — small text files stored on your device. Cookies may be **first-party** (ours) or **third-party** (used by external service providers).

When you first visit our site, a cookie banner appears. Continuing to browse means you consent to their use.

We use tools such as:

- **Facebook Pixel** – marketing effectiveness analysis,
- **Google Analytics** – traffic and behavior analysis,
- **Microsoft Clarity** – user session tracking for optimization.

Each tool collects **anonymous data** (e.g., location, age, online activity). You can change or delete cookies in your browser settings.

META (Facebook) Pixel

Implemented via **Meta Platforms, Inc.**

Used to:

- analyze ad effectiveness,
- target ads to site visitors,
- tailor ads to user interests.

Data is anonymous but may be combined with Meta's data.

Learn more: [Meta Help – Facebook Pixel](#)

Google Analytics

Provided by **Google LLC**.

Used to:

- analyze website traffic,
- identify engaging content,
- tailor offerings to user preferences.

Operates via cookies. Data is anonymous but may be linked by Google.

More info: [Google Privacy Policy](#)

Microsoft Clarity

Provided by **Microsoft Corporation**.

Used to analyze user interactions (clicks, scrolls) for UX improvements.

Data is anonymous but may be combined with Microsoft data.
Learn more: [Microsoft Clarity FAQ](#) • [Microsoft Privacy Policy](#)

TikTok Pixel

Provided by **TikTok Technology Limited / TikTok Inc.**

Used to:

- measure campaign performance,
- retarget visitors,
- personalize ads for TikTok users.

Data is anonymous (location, gender, age, activity).

More info: [TikTok Pixel Info](#) • [TikTok Privacy Policy](#)

Manychat

Provided by **Manychat, Inc.**, used for marketing automation on social media (e.g., Instagram, Messenger).

Manychat may act as:

- **Controller** – for its own service management,
- **Processor** – for processing user data on our behalf.

Data may include:

- identification (name, email, nickname, social profile),
- communication activity (chat content, reactions),
- technical (IP, location, cookies).

More info:

- [Manychat Terms of Use](#)
- [Manychat Data Processing Agreement](#)
- [Manychat Privacy Policy](#)

Server Logs

Using www.madeinkulturka.art involves sending requests to our hosting server. Each request is logged, including:

- IP address,

- server date/time,
- browser info,
- operating system.

These logs:

- are not linked to specific users,
- are used only for administration and security,
- are not shared except with authorized personnel.

Final Provisions

All materials on www.madeinkulturka.art and Kulturka Hub are the **intellectual property** of the administrator and protected by law.

You may use them only for **personal purposes**. Reproduction, distribution, or commercial use without permission may result in legal liability.

All content is for **educational and informational purposes only**. It does not constitute legal, tax, or professional advice.

This Privacy Policy may change (e.g., due to legal updates, service provider changes, or platform development).

Any changes will be announced via publication of a new version on the website.

The current version is effective from the date of its publication.