

## What is this Privacy Policy about?

The details provided in this Privacy Policy shall provide you with information about when and how we collect personal data relating to you during your application process to our VCLeaders Program as well as when you visit our website and how we use such data. We inform you about the kind of personal data, the scope of personal data, and the purposes that such collection and use of personal data is performed for.

## What is personal data?

Personal data is any information relating to an identified or identifiable natural person. A person is identifiable, if the person can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity. This may include data such as e.g. name, email address, telephone number and mailing address.

## What is the legal basis for processing your data?

We process your data in the context of our service because such processing is necessary (i) to determine if, pursuant to your request, we can provide our service to you, or (ii) to actually perform the services and provide them to you. If you are not an actual user of the service anymore and we process your personal data for marketing purposes, our processing activities are based on VCL's legitimate interest consisting in pursuing the development of its business.

If you haven't yet subscribed to our services but have provided your personal data to receive marketing or any other communications from VCL, we process your data on the basis of your consent.

## What kind of personal data does VCL collect?

For the provision of our services, especially for the purpose of the application to the VCLeaders Program, we collect from you and process your identification data, including your name, surname, position and your e-mail address. In addition, for this purpose your data is being saved to a database of our hosting service provider and/or Google Drive. Google ensures the protection of your data in compliance with GDPR. For more, visit: <https://cloud.google.com/security/gdpr/>

## How does VCL use my personal data?

VCL uses the data for the following purposes:

- Reviewing your application to the VCLeaders Program.
- Communicating to the partners of the VCLeaders Program in case you have been selected to participate in the VCLeaders Program.
- Enabling you to participate in our services.
- To inform you about our service, changes to our service, or about similar services that we provide.
- For statistical use, under anonymized form.

## Who are the recipients of my personal data?

Your data may only be communicated to the authorized personnel of VCL and to those of the users of Our services and Our partners to which you have accepted that we communicate your data.

## For how long does VCL retain my data?

VCL retains your data for the duration of your participation in the VCLeaders Program and for a maximum period of 3 years thereafter.

If you have not yet applied to our VCLeaders Program or subscribed to any other of our services but have consented to receiving marketing communications from us, We will process your data until you withdraw such consent. You can unsubscribe from receiving such communication at any time.

## Does VCL save my data in case of me making a request?

In case you direct an inquiry to VCL, we save the communication history with you as well as information and data submitted in the course of this communication (e.g. email address), in order to optimally answer your request and any further follow-ups.

## Is my data secure?

The data about you is being protected with all reasonable efforts. However, we have to point out that the Internet does not allow for absolute data security despite all technical measures. We are not liable for actions of third parties.

## What are my rights in relation to VCL?

You have, upon such request, the right to cost-free information about the personal data stored in regard to your person. Furthermore, you have a right subject to the statutory provisions to have such personal data corrected and deleted. You also have the right to restriction of processing concerning such data, as well as, if you are an actual user of the service or have consented to the processing of your data to receive marketing communications, the right to data portability. When you have given your consent for the processing of your personal data, you can withdraw your consent at any time. You also have the right to lodge a complaint with a supervisory authority.

## Third-Party Websites

Our service may contain links or references to other websites outside of our control. Please be aware that this policy does not apply to these websites. We encourage you to read the privacy statements and terms and conditions of linked or referenced websites you enter. These third-party websites may send their own cookies and other tracking devices to you, log your IP address, and otherwise collect data or solicit personal data. **WE DO NOT CONTROL AND ARE NOT RESPONSIBLE FOR WHAT THIRD PARTIES DO IN CONNECTION WITH THEIR WEBSITES, OR HOW THEY HANDLE YOUR PERSONAL DATA. PLEASE EXERCISE CAUTION AND CONSULT THE PRIVACY POLICIES POSTED ON EACH THIRD-PARTY WEBSITE FOR FURTHER INFORMATION.**

## Children Under the Age of 16

Our service is not intended for children under 16 years of age, and we do not knowingly collect or use any personal data from children under the age of 16. No one under the age of 16 may provide any information to or on the Service. If we learn that we have collected or received personal data from a child under the age of 16, we will delete that information. If you believe we might have any information from or about a child under the age of 16, please contact us at [pawel@vcleaders.com](mailto:pawel@vcleaders.com).

## Revisions to VCL's Privacy Policy

We reserve the right to change this policy at any time. Any changes we make will be posted on this page. If we make material changes to how we treat your personal data, we will notify you through a notice on the service. The date this policy was last revised is identified at the top of the page. You are responsible periodically monitoring and reviewing any updates to this policy. Your continued use of our Service after such amendments will be deemed your acknowledgement of these changes to this policy.

## How do I contact VCL regarding data privacy aspects?

If you have any requests, questions, or suggestions related to data privacy, please direct your request to [pawel@vcleaders.com](mailto:pawel@vcleaders.com). We look forward to hearing from you.