

# MedSales Academy

<https://medsales-academy.sendpulse.courses/>

*Registered in the Republic of Poland*

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## PRIVACY POLICY

*Edition dated 04 March 2026 · Compliant with GDPR and Polish law*

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*This document has been prepared in accordance with Regulation (EU) 2016/679 (GDPR), the Act of the Republic of Poland of 10 May 2018 on the Protection of Personal Data (Dz.U. 2018 poz. 1000, as amended) and the Act of 18 July 2002 on the Provision of Electronic Services (Dz.U. 2002 nr 144 poz. 1204).*

### 1. General Provisions

1.1. This Privacy Policy (hereinafter — the "Policy") defines the procedure for collecting, processing, storing and protecting the personal data of users of the MedSales Academy online course, available at <https://medsales-academy.sendpulse.courses/> (hereinafter — the "Website").

1.2. The controller of personal data (within the meaning of Art. 4(7) GDPR) is: IHOR HRYTSENKO (hereinafter — the "Controller"), registered at: Region Śląskie, Gliwice, ul. Czwartaków 11/27, Poland, NIP: 6312731797, REGON: Śląskie.

1.3. Contact details of the Controller regarding the processing of personal data: e-mail: [medsales.academyonline@gmail.com](mailto:medsales.academyonline@gmail.com).

1.4. Use of the Website and the provision of personal data is voluntary, but necessary to receive certain services (registration, payment, access to the course).

### 2. Definitions

In this Policy, terms are used in the meanings assigned to them by the GDPR:

- "Personal data" (Art. 4(1) GDPR) — any information relating to an identified or identifiable natural person.
- "Processing" (Art. 4(2) GDPR) — any operation or set of operations performed on personal data.
- "Data subject" — an identified natural person whose personal data are processed.
- "Controller" (Art. 4(7) GDPR) — a person who determines the purposes and means of processing personal data.
- "Processor" (Art. 4(8) GDPR) — a person who processes data on behalf of the Controller.

— "Supervisory authority" — Urząd Ochrony Danych Osobowych (UODO), ul. Stawki 2, 00-193 Warsaw, Poland.

### 3. Categories and Sources of Personal Data

3.1. The Controller collects the following categories of personal data:

- Identification: first and last name.
- Contact: e-mail address, phone number.
- Technical: IP address, browser and device type, cookies, session data and Website activity.
- Transactional: information about orders and payments (card details are not stored — processed through certified payment operators).
- Educational: module completion progress, test results.
- Messages: content of queries, comments and reviews submitted voluntarily.

3.2. The Controller does NOT process special categories of personal data (Art. 9 GDPR) — data concerning health, racial/ethnic origin, religious beliefs, genetic or biometric data, etc.

3.3. Personal data is obtained directly from data subjects (registration form, payment form, correspondence) and automatically (cookies, analytics systems).

### 4. Purposes and Legal Bases for Processing (Art. 6 GDPR)

Purpose of processing	Legal basis (Art. 6 GDPR)	Retention period
Providing access to the course and contract performance	Art. 6(1)(b) — contract performance	5 years after contract expiry
Registration and account management	Art. 6(1)(b) — contract performance	Until account deletion + 3 years
Processing payments	Art. 6(1)(b) and (c) — contract + legal obligation	5 years (Polish Accounting Act)
Fulfilment of tax and accounting obligations	Art. 6(1)(c) — legal obligation	5 years from end of financial year
Sending service notifications	Art. 6(1)(b) — contract performance	Duration of the contract
Marketing communications (with consent)	Art. 6(1)(a) — consent	Until withdrawal of consent
Analytics and Website improvement	Art. 6(1)(f) — legitimate interest	13 months (cookies) / 2 years
Protection of legitimate interests (disputes, claims)	Art. 6(1)(f) — legitimate interest	Until expiry of limitation period (PL: 3–6 years)
Technical security and logging	Art. 6(1)(f) — legitimate interest	12 months

4.1. The Controller conducts a balancing test prior to applying Art. 6(1)(f) GDPR and ensures that the legitimate interest does not override the fundamental rights and freedoms of data subjects.

## 5. Recipients of Personal Data

5.1. Personal data may be transferred to the following categories of recipients:

- Cloud and hosting service providers (including Sendpulse, Google Cloud, AWS or equivalents), acting on the basis of concluded data processing agreements (DPA) in accordance with Art. 28 GDPR.
- Payment operators (including Stripe, PayU, Przelewy24 or equivalents) complying with PCI-DSS and GDPR requirements.
- Email and SMS marketing service providers (with the data subject's separate consent).
- Analytics services (Google Analytics, Meta Pixel, etc.) — solely subject to separate consent to cookies (in accordance with the Polish Telecommunications Act of 16.07.2004).
- Legal, audit and accounting advisors — to the extent necessary to fulfil obligations.
- Authorised public authorities (courts, prosecution, police, UODO) — solely on the basis of lawful requests.

5.2. The Controller does not sell personal data to third parties.

5.3. A data processing agreement (DPA) complying with Art. 28 GDPR is concluded with each processor.

## 6. Transfer of Personal Data to Third Countries

6.1. Where the Controller uses services involving the transfer of personal data outside the European Economic Area (EEA), such transfer is carried out solely where:

- An adequacy decision by the European Commission is in place (Art. 45 GDPR); or
- Standard Contractual Clauses (SCCs) approved by the European Commission are in place (Art. 46 GDPR); or
- Binding Corporate Rules (BCRs) are in place (Art. 47 GDPR).

6.2. The data subject has the right to obtain information about the specific safeguards applied to such transfer by contacting the Controller.

## 7. Cookies and Tracking Technologies

7.1. The Website uses cookies and similar technologies in accordance with Art. 173 of the Polish Telecommunications Act of 16.07.2004 and the Act of 18.07.2002 on the Provision of Electronic Services.

7.2. Types of cookies:

- Necessary (technical) — ensure basic functionality of the Website; do not require consent.
- Functional — remember user settings; require consent.
- Analytical — collect anonymised statistics (e.g. Google Analytics); require consent.
- Marketing — track behaviour for personalised advertising; require separate explicit consent.

7.3. Consent to non-essential cookies is obtained via a banner on the first visit to the Website. Withdrawal of consent to cookies is possible at any time via Website or browser settings.

7.4. The retention period for analytical cookies is no more than 13 months in accordance with the recommendations of CNIL (French supervisory authority) and UODO.

## **8. Rights of Data Subjects (Art. 13–22 GDPR)**

8.1. Under the GDPR, data subjects have the following rights:

1. Right of access (Art. 15 GDPR) — obtaining confirmation of processing and a copy of personal data.
2. Right to rectification (Art. 16 GDPR) — requesting correction of inaccurate or completion of incomplete data.
3. Right to erasure / "right to be forgotten" (Art. 17 GDPR) — requesting deletion of data under the conditions provided by the GDPR (in particular when data are no longer necessary for the purposes for which they were collected).
4. Right to restriction of processing (Art. 18 GDPR) — requesting suspension of processing under certain conditions.
5. Right to data portability (Art. 20 GDPR) — receiving data in a structured machine-readable format and/or transferring it to another controller (applies where the basis is consent or contract and processing is carried out by automated means).
6. Right to object (Art. 21 GDPR) — objecting to processing based on legitimate interest (Art. 6(1)(f)) or for direct marketing purposes. The Controller is obliged to cease processing unless it demonstrates compelling grounds.
7. Right to withdraw consent (Art. 7(3) GDPR) — at any time without affecting the lawfulness of processing before withdrawal.
8. Right to lodge a complaint with the supervisory authority (Art. 77 GDPR) — with UODO: [www.uodo.gov.pl](http://www.uodo.gov.pl), ul. Stawki 2, 00-193 Warsaw, tel.: +48 606 950 000.

8.2. To exercise rights, please send a request to: [medsales.academyonline@gmail.com](mailto:medsales.academyonline@gmail.com).

8.3. The Controller responds without undue delay, generally within 1 (one) month. In exceptional or complex cases, the period may be extended by a further 2 (two) months, with mandatory notification to the data subject of the reasons for the extension (Art. 12(3) GDPR).

8.4. The service is free of charge. The Controller may charge a reasonable fee only in the case of manifestly unfounded or excessively repetitive requests (Art. 12(5) GDPR).

8.5. The Controller may request verification of the data subject's identity before fulfilling a request in order to protect against unauthorised access.

## **9. Automated Decision-Making and Profiling**

9.1. The Controller does not carry out automated decision-making that produces legal effects or similarly significantly affects the data subject (Art. 22 GDPR).

9.2. Analytical processing (e.g. Google Analytics) is used for statistical purposes and does not create individual profiles for decision-making.

## 10. Security of Personal Data (Art. 25, 32 GDPR)

10.1. The Controller implements the principles of Privacy by Design and Privacy by Default (Art. 25 GDPR).

10.2. Technical security measures:

- Data encryption in transit: TLS 1.2/1.3 (HTTPS).
- Encryption of databases and backups.
- Pseudonymisation of data where technically feasible.
- Two-factor authentication for administrative access.
- Regular testing and assessment of the effectiveness of security measures.

10.3. Organisational measures:

- Access control based on the principle of least privilege.
- Regular staff training on GDPR and cybersecurity.
- Maintenance of a Record of Processing Activities (RoPA) in accordance with Art. 30 GDPR.
- Conclusion of DPAs with all processors (Art. 28 GDPR).
- Data Protection Impact Assessment (DPIA) for high-risk operations (Art. 35 GDPR).

## 11. Personal Data Breaches (Art. 33–34 GDPR)

11.1. Upon detection of a personal data breach, the Controller is obliged to:

- Notify UODO within 72 (seventy-two) hours of becoming aware — if the breach is likely to result in a risk to the rights and freedoms of natural persons (Art. 33 GDPR).
- Notify data subjects without undue delay — if the breach is likely to result in a high risk to their rights and freedoms (Art. 34 GDPR).
- Document every breach — regardless of notification — including the circumstances, consequences and remedial actions taken (Art. 33(5) GDPR).

## 12. Changes to the Policy

12.1. The Controller reserves the right to amend this Policy in connection with changes in legislation, recommendations from UODO or technical changes in the operation of the Website.

12.2. Data subjects will be notified of material changes 14 (fourteen) days in advance by posting a notice on the Website and/or sending an e-mail. If changes affect previously given consents — a new consent will be requested.

## 13. Contact Information

13.1. For all matters related to the protection of personal data:

Controller: IHOR HRYTSENKO

Address: Region Śląskie, Gliwice, ul. Czwartaków 11/27, Poland

NIP: 6312731797 / REGON: Śląskie

E-mail: [medsales.academyonline@gmail.com](mailto:medsales.academyonline@gmail.com)

13.2. Complaints regarding personal data processing may be lodged with the supervisory authority:

Urząd Ochrony Danych Osobowych (UODO)

ul. Stawki 2, 00-193 Warsaw, Poland

[www.uodo.gov.pl](http://www.uodo.gov.pl) | e-mail: [kancelaria@uodo.gov.pl](mailto:kancelaria@uodo.gov.pl) | tel.: +48 606 950 000

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