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**Privacy Policy of Huge Thing sp. z o.o.  
based in Poznań, Ul. 23 Lutego 26, email: hello@huething.vc**

Maintaining the confidentiality of your data is extremely important to us, and we want you to know how we process it. For this reason, and to comply with our legal obligations under the GDPR, we have developed a Privacy Policy that describes how we protect and process personal data at Huge Thing sp. z o.o.

Please remember that under the GDPR, personal data is any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Importantly, data relating to legal persons is not covered by the GDPR regulations.

By establishing a relationship with us, including using our consulting services or participating in our acceleration programs, you entrust us with your personal data. Our collaboration aims, among other things, to ensure the highest possible quality of our services.

This privacy policy was published on July 1, 2025 and applies to all Users of the website <https://huething.vc/> (hereinafter referred to as the Website), as well as users of the forms available there, all users of our social media accounts (Facebook, Instagram, LinkedIn), and all persons cooperating with us or contacting us on other matters, including submitting recruitment applications for future recruitment.

We prohibit individuals under the age of 18 from using the Site without the consent of a parent or guardian. We do not knowingly collect personal information from children under the age of 13.

We reserve the right to make changes to this Policy.

Previous versions: none

Effective from: July 1, 2025

### [1. Who is responsible for your personal data?](#)

When you browse our website <https://huething.vc/>, use the forms available there, use our social media accounts (Facebook, Instagram, LinkedIn), establish cooperation with us or contact us on other matters, including submitting recruitment applications for future recruitment, the controller of your data is Huge Thing sp. z o.o. with its registered office in Poznań (61-740 Poznań) at ul. 23 Lutego 26 entered into the Register of Entrepreneurs of the National Court Register under the KRS number 0000411691, NIP 9721238305, REGON 302055042, e-mail: [hello@huething.vc](mailto:hello@huething.vc).

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**HQ Address:**

Huge Thing Sp. z o.o.  
Ul. 23 Lutego 26  
61-740 Poznań

[hello@huething.vc](mailto:hello@huething.vc)  
[www.huething.vc](http://www.huething.vc)

## 2 Your rights related to the processing of personal data.

You can submit any requests regarding the exercise of your rights to the Controller, i.e. Huge Thing sp. z o.o., (61-740 Poznań) at ul. 23 Lutego 26

Every data subject has the right to submit a request to us in order to exercise his or her rights, which may include:

- A. the right to access data,
  - B. the right to rectification,
  - C. the right to erasure ("the right to be forgotten"),
  - D. the right to restriction of processing,
  - E. the right to data portability,
  - F. the right to object to the processing of personal data:
    - a) Right to object to the processing of your data for direct marketing purposes – you may object at any time to the processing of your personal data for such marketing purposes, including profiling, to the extent that the processing is related to such direct marketing, without the need to justify such objection;
    - b) Right to object to other processing purposes – you may object at any time – for reasons related to your particular situation – to the processing of your personal data based on our legitimate interest, including profiling – any objection in this respect must include justification;
  - G. the right not to be subject to a decision (including profiling) based solely on automated processing that produces legal effects for you or significantly affects you in a similar way – you may object to such processing at any time.
  - H. the right to withdraw consent (when processing is based on consent) – this applies at any time. Withdrawal of consent will not affect the lawfulness of the processing we carried out on the basis of consent before its withdrawal.
  - I. the right to lodge a complaint with a supervisory authority responsible for personal data protection, both in Poland (to the President of the Office for Data Protection) and in the EU Member State of your habitual residence, place of work, or alleged infringement.
1. Applications may be submitted:
    - a) by mail to the following address: Management Huge Thing sp. z o.o., (61-740 Poznań) at ul. 23 Lutego 26, Poland;
    - b) in electronic form to the following email address: [hello@huething.vc](mailto:hello@huething.vc).
    - c) in person at our registered office, (61-740 Poznań) at ul. 23 Lutego 26, Poland;
  2. We consider requests from data subjects with due diligence, taking into account legal provisions and the rights and freedoms of other data subjects.
  3. When submitting your request, you should provide information that allows for your unambiguous identification.
  4. We do not refuse to take action at the request of a data subject who wishes to exercise their rights, unless we are unable to unambiguously identify the data subject.
  5. We will provide information on the actions taken in response to your request without undue delay, and in any case within one month of receiving your request. If necessary, we may extend this period by another two months due to the complex nature of the request or the number of requests. We will inform you of such extension within one month of receiving your request, providing the reasons for the delay.

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6. If we receive your request electronically, we will also respond electronically, if possible, unless the request states otherwise.
7. If we do not take action in connection with your request, we will inform you immediately – no later than one month from receiving the request – about the reasons for not taking action and about the possibility of filing a complaint with the supervisory authority and seeking legal remedies.
8. Communications and actions taken in connection with the exercise of your rights are generally free of charge. However, if requests prove to be manifestly unfounded or excessive, particularly due to their repetitive nature, we may:
  - a) charge a reasonable fee, taking into account the administrative costs of providing the information, conducting the communication, or taking the requested actions; or
  - b) refuse to act on the request.
9. If we are unable to clearly identify you or if we have reasonable doubts as to your identity, we may request additional information necessary to confirm your identity. If you do not provide additional information within 30 days of receiving the request and your clear identification is impossible, your request will be rejected. You will be informed of the deadline for providing additional information and the consequences of not providing it.
10. We inform each recipient to whom we have shared your personal data about their rectification, supplementation, deletion or restriction of their processing, unless this proves impossible or would require a disproportionate effort.

### 3. [What happens to your data when:](#)

#### A. [you are using our website https://huething.vc/](https://huething.vc/)

We process data collected by cookies used on our website. Cookies generally do not constitute personal data. However, certain information stored in cookies (e.g., preferences), especially when combined with other information about website users, may be considered personal data. More information can be found in our [Cookie Policy](#).

For each call to the Website, the server automatically saves only so-called server logs, such as the name of the requested file, your IP address, the date and time of the call, the amount of data transferred and the requesting Internet service provider (so-called access data), and documents the call to the Website.

We also provide you with a cookie management panel on the Website and ask you to express your cookie preferences. Further data collection while you browse our Website is based on your cookie preferences. More information about the cookies we use can be found in our Cookie Policy.

When you load our Website, only necessary cookies are installed on your device. We use necessary cookies primarily to provide you with the services and functionalities of the Website you wish to use. The Website cannot function properly without these cookies. Necessary cookies may be installed by us – in accordance with the provisions of the Electronic Communications Law – without your consent. At the same time, we use other cookies on the Website. These files are installed on your device if you consent to them via the cookie banner displayed after loading the Website. You can always access this banner by clicking the cookie icon permanently present on our Website. You can read more about this in the Cookie Policy.

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### On what basis do we process your personal data and for what purposes?

We process the data of persons using the Website (including IP address or other identifiers and information collected via cookies or other similar technologies) to the extent necessary to provide access to the Website and its basic functionalities:

- to provide electronic services within the scope of making the Website content and its basic functionalities available to Users – in this case, the legal basis for processing is the necessity of processing for the performance of the contract;
- to ensure the security and operation of the Website – based on our legitimate interest in ensuring the availability and security of the Website;
- for other purposes only after you have expressed your consent by managing cookies using the cookie panel. More information about the cookies used and the purposes of processing can be found in the Cookie Policy.

User activity on the Website, including their personal data, is recorded in system logs (a special computer program used to store a chronological record containing information about events and activities related to the IT system used to provide our services). The information collected in the logs is processed in connection with the provision of the service and the legal basis for processing is the necessity to perform the contract. We also process this data to ensure the security and proper functioning of IT systems, for example, in connection with testing changes to IT systems, detecting irregularities, or protecting against abuse and attacks – based on our legitimate interest in ensuring the availability and security of the Website. For other purposes – based on your consent expressed by configuring cookies using the cookie panel.

### Who do we share your data with – data recipients?

We share your data with:

- third-party cookie providers – more on this in the [Cookie Policy](#).
- subcontractors, i.e., entities we use to process data and with whom we have entered into a personal data processing agreement, including: hosting service providers, suppliers of IT solutions used, entities providing IT support services to us, and entities that support us in operating the Website and maintaining its functionality.

### Do we transfer your data to a third country and on what basis?

We inform you that we do not transfer your data to a third country.

### For how long do we process your personal data?

- always for the period necessary to achieve the processing purposes, whereby:

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If the legal basis for processing is our legitimate interest, no longer than until an effective objection is raised;

If the legal basis for processing is your consent, no longer than until you withdraw it (which you can do at any time, without affecting the processing carried out prior to your withdrawal);

In the case of data collected via cookies, depending on the cookie, more information can be found in the [Cookie Policy](#).

#### Does the processing involve automated decision-making, including profiling?

We do not currently use automated decision-making, including profiling, with respect to your data that produces legal effects or similarly significantly affects you.

**You have the right to:** access your data, request rectification, erasure, restriction of processing, and data portability. You have the right to withdraw your consent at any time, without affecting the processing carried out before your withdrawal.

You have the right to **object** to data processing. This objection may be exercised if a specific situation arises concerning you (justifying the objection), and we process your data based on our legitimate interest.

You have the right to lodge a complaint with a supervisory authority. The supervisory authority for us is the President of the Personal Data Protection Office. You can also lodge a complaint in the Member State of your habitual residence, place of work, or place of alleged infringement.

#### Czy podanie danych jest obowiązkowe czy dobrowolne?

W przypadku załadowania naszej Strony do przeglądania pobieramy tylko te dane, które są niezbędne do jej wyświetlenia (pliki cookies niezbędne)– bez ich pobrania wyświetlenie Strony (świadczenie usługi) będzie niemożliwe.

Więcej w [Polityce cookies](#).

#### B. [you apply for the programs we organize](#)

This Policy does not apply to the processing of data you provide to us as part of applying for participation in programs we organize, such as acceleration programs. The principles of processing your data in connection with applying are described in the regulations of such programs or in other documents that you read before deciding to apply. These principles may differ from those described below, in particular regarding the group of entities that have access to your data, the purposes of processing, and the methods of processing it.

#### C. [you wish to receive information about our new projects](#)

We then process the email address you provided to send you information about new Huge Thing projects – based on your consent expressed by checking the checkbox. You have the right to withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

We share personal data with the following categories of entities: subcontractors - i.e. entities we use to process data, with whom we have concluded an agreement entrusting the processing of

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personal data, e.g.: hosting service provider, office software provider, including e-mail; entities providing IT support services and administrative services to us.

We do not transfer your data to third countries.

We process your data for a period of one year from your request. After this period, we will ask you again whether you wish to continue receiving such information.

Your personal data will not be subject to a decision based solely on automated processing, including profiling, that produces legal effects or significantly affects you in a similar manner.

**You have the right to:** access your data, request rectification, erasure, restriction of processing, and data portability. You have the right to withdraw your consent at any time, without affecting the processing carried out before your withdrawal.

You have the right to lodge a complaint with a supervisory authority. The supervisory authority for us is the President of the Personal Data Protection Office. You can also lodge a complaint in the Member State of your habitual residence, place of work, or place of alleged infringement.

Providing your data is voluntary. Failure to provide your data will result in you not receiving information about our new projects.

**D. [you send us a recruitment application when we are not recruiting](#)**

Submitting a recruitment application during a period when no recruitment is taking place will be treated as consent to the processing of the personal data provided in the application. We will then process the data you provide in your application. We process your data in order to consider your candidacy in future recruitment processes – based on your consent expressed by sending us your application. You have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

We share personal data with the following categories of entities: subcontractors – entities we use to process data, with whom we have entered into a personal data processing agreement, e.g., a hosting provider, an office software provider, including email; and entities providing us with IT support, administrative, or HR services.

We do not transfer your data to third countries.

We process data provided to us for future recruitment purposes for a period of one year from the date of their submission, but no longer than until the consent is withdrawn.

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Your personal data will not be subject to a decision based solely on automated processing, including profiling, that produces legal effects or significantly affects you in a similar manner.

**You have the right to:** access your data, request rectification, erasure, restriction of processing, and data portability. You have the right to withdraw your consent at any time, without affecting the processing carried out before your withdrawal.

You have the right to lodge a complaint with a supervisory authority. The supervisory authority in our case is the President of the Personal Data Protection Office. You can also lodge a complaint in the Member State of your habitual residence, place of work, or place of alleged infringement.

You have the right to lodge a complaint with a supervisory authority. The supervisory authority in our case is the President of the Personal Data Protection Office. You can also lodge a complaint in the Member State of your habitual residence, place of work, or place of alleged infringement.

[E. E. you contact us on any matter or ask about our offer or the possibility of business cooperation, including using the DROP US A MESSAGE form for this purpose](#)

We process the data you provide in your inquiry. We process this data for the following purposes:

- responding to your inquiry and addressing the matter you are contacting us about – based on our legitimate interest in communicating with you in connection with our business;
- presenting our offer or concluding a contract as part of our business – based on your interest in our services and the steps you have taken to conclude a contract.

We share personal data with the following categories of entities: subcontractors – entities we use to process data and with whom we have entered into a personal data processing agreement, such as a hosting provider, an office software provider, including email; and entities providing IT support and administrative services to us.

We do not transfer your data to third countries.

We process data processed to process inquiries for a period of one year, calculated from the time we cease contact regarding a given matter.

Your personal data will not be subject to a decision based solely on automated processing, including profiling, that produces legal effects for you or significantly affects you in a similar manner.

**You have the right to:** access your data, request rectification, erasure, restriction of processing, and data portability.

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You have the right to [object](#) to the processing of your data. This objection may be exercised when a specific situation arises that justifies the objection, and we process your data based on our legitimate interest.

You have the right to lodge a complaint with a supervisory authority. The supervisory authority for us is the President of the Personal Data Protection Office. A complaint may also be filed in the Member State of your habitual residence, place of work, or place of alleged infringement.

Providing your data is voluntary. Failure to provide it will prevent us from presenting you with our offer and establishing cooperation.

F. [you have established business cooperation with us](#)

We then process the data necessary to implement this cooperation, including the conclusion and performance of a contract – based on the concluded contract – for the purpose of its execution. We also process data to fulfil our legal obligations in relation to running our business and implementing the concluded contract under the provisions of law, e.g. to record revenues (tax law provisions).

We share personal data with the following categories of entities: subcontractors – entities we use to process data, with whom we have entered into a personal data processing agreement, such as a hosting provider, an office software provider, including email; and entities providing IT support and administrative services to us. We may share personal data with data controllers separate from us, such as attorneys, legal advisors, and auditors – who support us in our business activities.

We do not transfer your data to third countries.

We process data obtained in connection with cooperation or the conclusion and performance of a contract until the completion of the cooperation or contract and its settlement. Data processed for the purpose of fulfilling our legal obligations in relation to our business activities and the performance of the contract are processed for the period for which we are required by law to store the data or for the period for which we may suffer legal consequences of failing to fulfill our obligations.

Your personal data will not be subject to a decision based solely on automated processing, including profiling, that produces legal effects for you or significantly affects you in a similar manner.

[You have the right to:](#) access your data, request its rectification, erasure, restriction of processing, and data portability.

You have the right to lodge a complaint with a supervisory authority. The supervisory authority for us is the President of the Personal Data Protection Office. You can also lodge a complaint in the member state of your habitual residence, place of work, or place of alleged infringement.

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Podanie danych ma charakter dobrowolny. Ich niepodanie uniemożliwi zawarcie i wykonywanie umowy.

G. [you use the forms available on the Website: DOWNLOAD DECK PRESENTATION/JOIN OUR MAP/DOWNLOAD HUGE INNOVATORS' MAP](#)

We process the data you enter into the form to process the content of your application, including providing you with the materials you requested or reviewing your application. We process your data based on your consent expressed by submitting the form. You have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

We share your personal data with the following categories of entities: subcontractors – entities we use to process your data, with whom we have entered into a personal data processing agreement, such as a hosting provider, an office software provider, including email; and entities providing us with IT support or administrative services.

We do not transfer your data to third countries.

We process your data for a period of one year from its receipt or until your consent is withdrawn.

Your personal data will not be subject to a decision based solely on automated processing, including profiling, that produces legal effects or significantly affects you in a similar manner.

**You have the right to:** access your data, request rectification, erasure, restriction of processing, and data portability. You have the right to withdraw your consent at any time, without affecting the processing carried out before your withdrawal.

You have the right to lodge a complaint with a supervisory authority. The supervisory authority for us is the President of the Personal Data Protection Office. You can also lodge a complaint in the Member State of your habitual residence, place of work, or place of alleged infringement.

Providing your data is voluntary. Failure to provide them will result in you not receiving the materials you can request via the form or your application will not be sent to us.

H. [you are a representative, proxy, or contact person of the entity with which we cooperate](#)

We then process the following categories of your personal data: name, surname, business contact details, position/role, other business personal data indicated at the stage of concluding and implementing cooperation (including the contract).

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We obtain your data from you or from the entity for which you are a representative, attorney or contact person.

We process your data for the following purposes and on the following legal bases:

- a) to cooperate with the entity you represent, including concluding and performing a contract with them – based on our legitimate interest in ensuring the legal security of our business activities, including ensuring the possibility of concluding and performing the provisions of the contract, settling the contract, maintaining contact related to the execution and performance of the contract, and correctly identifying persons authorized to represent and incur obligations on behalf of the entity you represent;
- b) to fulfill our legal obligations related to our business activities and the performance of the aforementioned cooperation, including the contract – based on legal provisions, e.g., to demonstrate the legal effectiveness of the concluded contract or to record revenue (tax law provisions);

Your data is shared with the following categories of entities:

- a) entities and individuals to whom the disclosure of data is required by the content of the aforementioned cooperation or concluded agreement, i.e., the purpose of the cooperation or agreement cannot be achieved without sharing the data with these recipients;
- b) subcontractors – i.e., entities whose assistance we utilize in processing your data, with whom we have entered into a personal data processing agreement, e.g., our intermediaries, hosting service providers, entities providing IT support services to us, accounting firms, other subcontractors involved in the implementation of the aforementioned cooperation or agreement;
- c) other entities that support our business with their services and who, due to the services they provide to us, remain data controllers separate from us, e.g., attorneys, legal advisors, auditors.

We do not transfer your data to third countries.

Your data will be processed for the period necessary to achieve the processing purposes indicated above, i.e.:

- a) We process data obtained in connection with cooperation or the conclusion and performance of a contract until the cooperation or contract is completed and settled;
- b) Data processed to fulfill our legal obligations related to our business and the performance of the contract is processed for the period during which we are required by law to store the data or for the period during which we may suffer legal consequences for failing to fulfill our obligations.
- c) Data processed based on our legitimate interests - we cease processing if you object to the processing, unless we demonstrate compelling legitimate grounds for processing that override your interests, rights, and freedoms, or grounds for establishing, pursuing, or defending legal claims.

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Your personal data will not be subject to a decision based solely on automated processing, including profiling, that produces legal effects or significantly affects you in a similar manner.

**You have the right to:** access your data, request rectification, erasure, restriction of processing, and data portability.

**You have the right to object** to data processing. This objection may be exercised if a specific situation exists that justifies the objection, and we process your data based on our legitimate interest.

You have the right to lodge a complaint with a supervisory authority. The supervisory authority for us is the President of the Personal Data Protection Office. You can also lodge a complaint in the Member State of your habitual residence, place of work, or place of alleged infringement.

To the extent that data processing is carried out for the purpose of entering into and performing the aforementioned cooperation or contract, providing your data is a condition for entering into and performing the cooperation or contract. Providing data is voluntary, but failure to provide data will result in the inability to establish cooperation or conclude or execute a contract.

#### I. [you click on social media plugins placed on our Website](#)

Our Website uses so-called social media plug-ins, such as Facebook, Instagram, and LinkedIn. When you visit the Website, your data is not automatically transferred to these social networks. Data will only be transferred to social networks if you actively activate the corresponding social network button. In this case, your browser will start connecting to the servers of the social network in question. By clicking the appropriate button (e.g., the ICON of the relevant social network), you consent to your browser generating a link to the servers of the relevant social network and transmitting your data to the relevant social network provider, and vice versa. We have no influence on the nature and scope of the data collected by social networks.

The social network provider stores the data collected about you as a user profile and uses it for advertising, market research, and/or audience-oriented website design. Such evaluation takes place in particular (also for non-logged-in users) for the purpose of preparing advertising and to inform other users of the social network about your activities on our Website. You have the right to object to the creation of your profiles. To exercise this right, you must contact the provider of the relevant plug-in. Plug-ins allow us to interact with social networks and other users, allowing us to improve our services and make them more interesting.

Data is transmitted regardless of whether you have an account with the plug-in provider or are logged in. If you are logged in with the plug-in provider, the collected data will be directly assigned to your existing account. When you click on the activated button and (for example) link to the page, the plug-in provider stores this information in your account and makes it publicly available to your friends. We recommend logging out regularly after using a social network, especially before activating the button, as this will prevent the plug-in provider from assigning your profile.

Each social media channel has its own policy regarding how it processes and protects personal data. If you have any concerns or questions about the use of your personal data by these portals, please review their privacy policies carefully before using them.

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We have placed icons for the following social media on the Website:

- Facebook and Instagram – the provider is Meta Platforms Ireland Limited, Merrion Road, Dublin 4, DO4 X2K5 Ireland. Information on data processing can be found at the following link: [https://www.facebook.com/privacy/policy/?locale=pl\\_PL](https://www.facebook.com/privacy/policy/?locale=pl_PL) or [https://help.instagram.com/196883487377501/?helpref=hc\\_fnav&locale=pl\\_PL](https://help.instagram.com/196883487377501/?helpref=hc_fnav&locale=pl_PL) ;
- LinkedIn – the provider is LinkedIn Ireland Unlimited Compan, Wilton Pl, Dublin, Ireland. Information on data processing can be found at the following link: <https://pl.linkedin.com/legal/privacy-policy?>

These providers process your data for their own purposes, which are unknown to us – as data controllers separate from us.

This processing may result in the transfer of your personal data to a third country under the terms set out in the privacy policies of these providers.

For more information about the purpose and scope of data collection and processing by the plug-in provider, please review the data protection declarations of these providers, presented below:

- Facebook – [https://www.facebook.com/privacy/policy/?locale=pl\\_PL](https://www.facebook.com/privacy/policy/?locale=pl_PL)
- Instagram - - [https://help.instagram.com/196883487377501/?helpref=hc\\_fnav&locale=pl\\_PL](https://help.instagram.com/196883487377501/?helpref=hc_fnav&locale=pl_PL)
- LinkedIn – <https://pl.linkedin.com/legal/privacy-policy?>

#### J. [you use our social media accounts:](#)

1. We have accounts on social media platforms such as Facebook, Instagram, and LinkedIn and we are their administrators.
2. Your data, as a user of our social media accounts, is processed when:
  - you subscribe to this content using the mechanism provided by the social media provider – this may be done, for example, by clicking the "Like," "Follow," "Share," or "Subscribe," etc. icon.
  - you engage in some activity on that social media platform – this may be done, for example, by clicking the "Like," "Comment," "Share," "Save post," "Feed," etc. icon.
  - you send us a private message using the "Send message" function or another function that enables such interaction.
2. Depending on your interactions on social media, we may process your name, nickname, image, information available in your public profile, and other information provided in messages or comments.
3. Your data is also managed by the providers of these social media platforms. These providers process your data for their own purposes, unknown to us, as data controllers separate from us.

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Processing may result in the transfer of your personal data to a third country under the terms set out in the privacy policies of these providers.

4. For more information about the purpose and scope of data collection and its processing by the plug-in provider, please refer to the data protection declarations of the providers listed below. The following providers will provide you with further information about your rights in this regard and provide you with setting options to protect your privacy.
  - Facebook and Instagram – the provider is Meta Platforms Ireland Limited, Merrion Road, Dublin 4, DO4 X2K5 Ireland. Information on data processing can be found at the following link: [https://www.facebook.com/privacy/policy/?locale=pl\\_PL](https://www.facebook.com/privacy/policy/?locale=pl_PL) or [https://help.instagram.com/196883487377501/?helpref=hc\\_fnav&locale=pl\\_PL](https://help.instagram.com/196883487377501/?helpref=hc_fnav&locale=pl_PL);
  - LinkedIn – the provider is LinkedIn Ireland Unlimited Compan, Wilton Pl, Dublin, Ireland. Information on data processing can be found at the following link: <https://pl.linkedin.com/legal/privacy-policy> ?
5. As the founders of the Facebook and Instagram accounts, we are joint controllers of personal data together with Meta Platforms Ireland Limited, Merrion Road, Dublin 4, DO4 X2K5 Ireland, i.e. the provider of these portals.

As the administrator of our Facebook and Instagram accounts, we have access to aggregate website statistics (number of fanpage/profile followers, age and gender of users with a percentage breakdown of followers, names of cities and countries from which users are following with a percentage breakdown, reach of the fanpage/profile and individual posts, number of likes and reactions, number of comments and shares, number of link clicks, and aggregated and anonymized reports on campaigns conducted using the self-service advertising system). We process this data jointly with Meta Platforms Ireland Limited. Details on the principles of joint data processing in the scope of statistics with Meta Platforms Ireland Limited are available at: [https://pl-pl.facebook.com/legal/terms/page\\_controller\\_addendum](https://pl-pl.facebook.com/legal/terms/page_controller_addendum) (where this document refers to the User, it refers to us, i.e. Huge Thing). In connection with joint control, you are entitled to exercise your rights towards each of the Joint Controllers by writing to Management Huge Thing sp. z o.o., (61-740 Poznań) at ul. 23 Lutego 26, Poland. Email: [hello@hugething.vc](mailto:hello@hugething.vc). or Meta Platforms Ireland Limited, Merrion Road, Dublin 4, DO4 X2K5 Ireland, contact form:

- You can find Facebook in your account - go to "Help and Support" in your account settings, then select "Report a Problem" or "Contact";
- You can find Instagram in your account - go to Settings, then select Help - Report a Problem or Contact Support.

Other principles of personal data processing specified by the provider of Facebook and Instagram can be found in the website's Privacy Policy [https://www.facebook.com/privacy/policy/?locale=pl\\_PL](https://www.facebook.com/privacy/policy/?locale=pl_PL)

or

[https://help.instagram.com/196883487377501/?helpref=hc\\_fnav&locale=pl\\_PL](https://help.instagram.com/196883487377501/?helpref=hc_fnav&locale=pl_PL).

#### For what purposes do we process your personal data?

We process your data as a user of our social media accounts for the following purposes:

- maintaining and managing these accounts, in accordance with the terms and conditions set by the providers of these media, and using them to inform about our activities, promote various events we organize and our brand and services, build and maintain a community connected with us, communicate through the available functionalities of the website (comments, chat, messages), ensure order and security of discussions on these profiles, including removing comments that violate the law, good practice, or the terms and conditions of a given social media site;

- analyze the activity of users of our profiles, including collecting data on the number of likes, comments, and shares of our profile or the content posted there –

based on our legitimate interest in undertaking activities aimed at informing about and promoting our activities, and communicating using the tools available on the website.

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

We process your personal data on our profiles based on our legitimate interests (Article 6, Section 1, Letter f of the GDPR), which include:

- ensuring order and security on our profiles by moderating posts and comments from our users;
- building positive relationships with our users, in particular by corresponding with them and organizing competitions;
- analyzing the activity of our users to best tailor the content posted there to their needs.

In the case of competitions, if you are the winner of a given competition, we will also process your personal data to fulfill our tax obligations related to prize settlement (Article 6, Section 1, Letter c of the GDPR).

### Who do we share your data with – data recipients?

We share your data with:

- subcontractors, i.e., entities we use to process data and with whom we have entered into a personal data processing agreement, including: suppliers of IT solutions used, entities providing IT support services to us, and entities that support us in managing accounts and maintaining their functionality;
- providers of these services, in accordance with the terms specified by them in their privacy policies:
  - Facebook – [https://www.facebook.com/privacy/policy/?locale=pl\\_PL](https://www.facebook.com/privacy/policy/?locale=pl_PL)
  - Instagram - [https://help.instagram.com/196883487377501/?helpref=hc\\_fnav&locale=pl\\_PL](https://help.instagram.com/196883487377501/?helpref=hc_fnav&locale=pl_PL)
  - LinkedIn – <https://pl.linkedin.com/legal/privacy-policy?>

### Do we transfer your data to a third country and on what basis?

We inform you that we do not transfer your data to third countries. However, providers of Facebook, Instagram, and YouTube may do so. More information:

- Facebook – [https://www.facebook.com/privacy/policy/?locale=pl\\_PL](https://www.facebook.com/privacy/policy/?locale=pl_PL)
- Instagram - [https://help.instagram.com/196883487377501/?helpref=hc\\_fnav&locale=pl\\_PL](https://help.instagram.com/196883487377501/?helpref=hc_fnav&locale=pl_PL)
- LinkedIn – <https://pl.linkedin.com/legal/privacy-policy?>

### For how long do we process your personal data?

Personal data will be processed for the period necessary to achieve the processing purposes indicated above, i.e.:

- Information contained in comments will be available on the website until they are deleted by the author;
- Statistical data regarding visitors to social media accounts will be processed for the duration of their availability on the websites.

- for activity analysis – until you object to the use of your data for this purpose and we determine that your objection is justified, but no longer than for the period you follow us;
- for ensuring order on our profiles – until you object to the use of your data for this purpose and we determine that your objection is justified, but no longer than for the period you follow us;
- for competitions – for the duration of the competition, and then under the terms and conditions set out in their rules.

Personal data collected by social networking service providers is subject to retention in accordance with their regulations:

- Facebook – [https://www.facebook.com/privacy/policy/?locale=pl\\_PL](https://www.facebook.com/privacy/policy/?locale=pl_PL)
- Instagram - [https://help.instagram.com/196883487377501/?helpref=hc\\_fnav&locale=pl\\_PL](https://help.instagram.com/196883487377501/?helpref=hc_fnav&locale=pl_PL)
- LinkedIn – <https://pl.linkedin.com/legal/privacy-policy?>

#### Does the processing involve automated decision-making, including profiling?

We currently do not use automated decision-making, including profiling, with your data that produces legal effects or significantly affects you in a similar manner. However, Facebook, Instagram, and LinkedIn may perform such processing. More information:

- Facebook – [https://www.facebook.com/privacy/policy/?locale=pl\\_PL](https://www.facebook.com/privacy/policy/?locale=pl_PL)
- Instagram - [https://help.instagram.com/196883487377501/?helpref=hc\\_fnav&locale=pl\\_PL](https://help.instagram.com/196883487377501/?helpref=hc_fnav&locale=pl_PL)
- LinkedIn – <https://pl.linkedin.com/legal/privacy-policy?>

#### What rights do you have?

You have the right to access your data, request its rectification, erasure, restriction of processing, and data portability.

**You have the right to object** to data processing. This objection may be exercised when a specific situation arises that justifies the objection, and we process your data based on our legitimate interest.

You have the right to lodge a complaint with a supervisory authority. The supervisory authority for us is the President of the Personal Data Protection Office. You can also lodge a complaint in the member state of your habitual residence, place of work, or place of alleged infringement.

Your rights in connection with the use of social media services towards their providers are described in their privacy policies:

- Facebook – [https://www.facebook.com/privacy/policy/?locale=pl\\_PL](https://www.facebook.com/privacy/policy/?locale=pl_PL)
- Instagram - [https://help.instagram.com/196883487377501/?helpref=hc\\_fnav&locale=pl\\_PL](https://help.instagram.com/196883487377501/?helpref=hc_fnav&locale=pl_PL)
- LinkedIn – <https://pl.linkedin.com/legal/privacy-policy?>

#### Is providing data mandatory or voluntary?

Providing data is entirely voluntary, and failure to provide it results in the inability to use these accounts and the content posted therein.

Due to the specific nature of the aforementioned social media platforms, information about the activities undertaken by users on these sites is public.

We obtain personal data from social media controllers from your public profile and entries on these social media sites.

K. [you go from our website to blog entries or podcasts](#)

From our website, you can access our blog posts and recorded podcasts. Blog posts are available at <https://huge-thing.medium.com/from-excel-spreadsheet-to-11m-pln-funding-the-wild-and-very-real-story-of-pergamin-8d2e3d25e215>, and podcasts are available at <https://open.spotify.com/episode/7zL0C5tS9geO90Xa3ptD8W?si=45c0caf4f46347bd&nd=1&dlsi=2cd3be80d2584fe1>.

The data controllers for your use of the aforementioned websites are their providers. When you visit our website, your data is not automatically transferred to these providers. Data will be transferred to these providers when you navigate to their websites. These suppliers process your data for their own purposes, which are not known to us – as data controllers separate from us. This processing may result in the transfer of your personal data to a third country under the terms of these providers' privacy policies. For more information on the purpose and scope of data collection and its processing by the provider, please refer to the data protection declarations of the providers below:

- in the case of a blog <https://huge-thing.medium.com/from-excel-spreadsheet-to-11m-pln-funding-the-wild-and-very-real-story-of-pergamin-8d2e3d25e215> - A Medium Corporation – under the terms of this administrator's privacy policy <https://policy.medium.com/medium-privacy-policy-f03bf92035c9>;
- for podcasts <https://open.spotify.com/episode/7zL0C5tS9geO90Xa3ptD8W?si=45c0caf4f46347bd&nd=1&dlsi=2cd3be80d2584fe1> - Spotify AB - under the terms of this administrator's privacy policy <https://www.spotify.com/pl/legal/privacy-policy/>

#### 4. [Security of personal data.](#)

We conduct ongoing risk analysis to ensure that personal data is processed securely – ensuring, above all, that only authorized individuals have access to data and only to the extent necessary for the tasks they perform. We ensure that all operations involving personal data are recorded and performed only by authorized employees and associates.

We take all necessary measures to ensure that our subcontractors and other collaborators also guarantee the application of appropriate security measures whenever they process personal data on our behalf.

#### 5. [Changes to the Privacy Policy.](#)

We reserve the right to make changes to this Policy, which may result from the need to adapt to changes in legal regulations or applicable privacy standards, or to expand our offer. Therefore, we will notify you of any significant changes to this Policy via an appropriate notice on our websites. This

notice will be presented prominently, informing you of the content of the changes and their consequences for your data. Each time the date of introducing changes will be determined so that the information about them appears in time to allow you to become familiar with the content of the information and to consider the nature and impact of the changes on the processing of your data. This date will take into account the need to create an appropriate timeframe within which you can exercise your rights under the GDPR (e.g., withdrawing consent or objecting to processing).