

Privacy Policy for Mobile Application and Websites

LegacyApp P.S.A.

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1. Preliminary Information

Aiming to ensure the highest standards of personal data processing security and compliance with applicable data protection laws, LegacyApp P.S.A. has prepared this privacy policy pursuant to the requirements of the European Parliament and Council Regulation (EU) 2016/679 of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), and the standards contained in national regulations. The information presented in the Policy allows you to familiarise yourself in detail with the principles of personal data processing by LegacyApp P.S.A.

2. Glossary of Terms

- **Application** – means the mobile application “LegacyApp” made available by the Data Controller on the Google and Apple online app stores for use on Android and iOS mobile devices.
- 9. **Substitute Beneficiary** – a person designated by the User within the Gold Service as an additional beneficiary, with whom the Data Controller makes contact in the event that the Beneficiary cannot be reached within the time specified by the User.
- **Cookies** – means small packets of data, called cookies, sent by a website that’s visited by a user and stored on such user’s end device (e.g. computer, laptop, smartphone).
- **Data Cloud** – means the data cloud provided by Google Ltd. or Apple Inc.
- **Data Controller** – means the entity deciding the purpose and means of personal data processing. LegacyApp P.S.A. is the Data Controller.
- **Data Recipient** – means a natural or legal person, public authority, agency, or another body, to whom the personal data is disclosed, whether a third party or not.
- **EEA** – means the European Economic Area, a free trade zone and common market comprising the European Union member states and the European Free Trade Association (EFTA) countries, excluding Switzerland. It is an area where free movement of personal data is ensured.
- **Electronic Services Act** – means the Act of July 18, 2002, on providing services by electronic means (Polish Journal of Laws No. 144, item 1204, as amended).
- **GDPR** – means the Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.
- **Personal Data** – means any information about an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, based on such data.
- **Policy** – means the privacy policy of LegacyApp P.S.A.
- **President of the Personal Data Protection Office** – means the supervisory authority within the meaning of the GDPR, overseeing the compliance with data protection laws in Poland.

- **Processing** – means any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, such as the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, or disclosing by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- **Profiling** – means any form of automated processing of personal data consisting of using personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location, or movements..
- **SSL Protocol** – means a network protocol used for secure internet connections, adopted as the standard for encryption on WWW pages. An SSL certificate ensures the confidentiality of data transmitted over the Internet.
- **Telecommunications Law** – means the Act of July 16, 2004, Telecommunications Law (Polish Journal of Laws No. 171, item 1800, as amended).
- **Third Countries** – means any countries that are not part of the EEA.
- **User** – means a person using the Application, website and social media profiles of the Data Controller.

3. Information about the Data Controller

The Data Controller has appointed a Data Protection Officer ("DPO"), who is Mateusz Borkiewicz. The Data Controller and the DPO can be contacted via email on: iod@legacy.app.

4. Legal Basis for Processing Personal Data

Purpose of Processing	Legal Basis	Data Recipients	Processing Time
Responding to messages sent via email and telephone contact.	Article 6(1)(f) GDPR i.e., the legitimate interest of the Controller in handling correspondence and telephone conversations.	IT service providers; Internet providers; Hosting providers; Microsoft Ltd.	For the period necessary to address the issue raised in the message.
User registration and account creation	Article 6(1)(b) GDPR i.e., processing is necessary for taking steps at the request of the data subject prior to entering into a contract.	IT service providers; Internet providers; Hosting providers; Google Ltd.; Apple Inc.	Until the completion of the contract
Provision of service – paid account (user account management and service support)	Article 6(1)(b) GDPR i.e., processing is necessary for the performance of a contract to which the data subject is party.	IT service providers; Internet providers; Hosting providers; progreso.pl sp. z o.o.; MobilitySoft sp. z o.o.	Until the completion of the contract extended by the period for pursuing or defending against claims until the issuance of a final court verdict.
Provision of service – free account (user account management and service support)	Article 6(1)(a) GDPR i.e., processing is based on the user's voluntarily given consent.	IT service providers; Internet providers; Hosting providers; Business partners; progreso.pl sp. z o.o.; MobilitySoft sp. z o.o.	Until the completion of the contract extended by the period for pursuing or defending against claims until the issuance of a final court verdict.
Marketing - SMS and telephone contact	Article 6(1)(f) GDPR i.e., the legitimate interest in conducting own marketing activities based on consent in accordance with the Telecommunications Law and the Electronic Services Act.	IT service providers; Internet providers; Hosting providers.	Until objection is raised or consent is withdrawn based on the Telecommunications Law and the Electronic Services Act.
Marketing - newsletter	Article 6(1)(f) GDPR i.e., the legitimate interest in conducting own marketing activities based on	IT service providers; Internet providers;	Until an objection is raised or consent is withdrawn based on the Telecommunications

Purpose of Processing	Legal Basis	Data Recipients	Processing Time
	consent in accordance with the Telecommunications Law and the Electronic Services Act.	Hosting providers.	Law and the Electronic Services Act.
Marketing – homepage and mobile application	Article 6(1)(a) and (f) GDPR i.e., 1. Consent for displaying ads as part of access to the free version of the app; 2. The legitimate interest in conducting own marketing activities.	IT service providers; Internet providers; Hosting providers; Google Ltd.; progreso.pl sp. z o.o.; Business partners	1. Until consent is withdrawn 2. Until an objection is raised.
Complaints (defense and pursuit of claims)	Article 6(1)(f) GDPR The legitimate interest in establishing, pursuing, or defending against claims.	IT service providers; Hosting providers;	Until the expiration of the claim period under civil law provisions and the issuance of a final court verdict.
Seeking to conclude and perform a contract (contractors)	Article 6(1)(b) GDPR Taking necessary actions to conclude a contract with clients.	IT service providers; Internet providers; Hosting providers; Law firms and legal advisors;	For the duration of the contract, its termination, and until the expiration of the period for filing potential claims
Contract performance (contractor's employees).	Article 6(1)(f) GDPR The legitimate interest of the Controller in coordinating actions with the contractor.	IT service providers; Internet providers; Hosting providers; Law firms and legal advisors;	For the duration of the contract, its termination, and until the expiration of the period for filing potential claims
Acceptance and consideration of requests based on GDPR	Article 6(1)(c) GDPR The obligation arising from GDPR to provide the data subject with information on actions taken in connection with the request.	IT service providers; Internet providers; Hosting providers; Law firms and legal advisors;	Until the expiration of claims.
Conducting statistics and profiling (website and mobile application)	Article 6(1)(f) GDPR The legitimate interest of the Controller in collecting and using statistics to improve the range and quality of offered services.	IT service providers; Internet providers; Hosting providers, Google Ltd.	Until an objection is raised.
Provision of services and processing of Trusted Friend's data	Article 6(1)(a) GDPR – consent	IT service providers; Internet providers; Hosting providers; Google Ltd	Until consent is withdrawn or until deleted by the User.
Provision of services and processing of Beneficiary's data	Article 6(1)(d) GDPR – necessity in order to protect the vital interests of the Beneficiary or of the User;	IT service providers; Internet providers; Hosting providers; Google Ltd	Until deleted by the User.
Provision of the Gold Service and processing of Substitute Beneficiary's data	Article 6(1)(d) GDPR – necessity in order to protect the vital interests of the User and the Substitute Beneficiary	IT service providers; Internet providers; Hosting providers; Google Ltd.	Until deleted by the User

A User may voluntarily provide any Personal Data; however, it may be necessary for a User to provide such Personal Data to effectively use the **Data Controller's services or communicate with the Data Controller**.

ADDITIONAL INFORMATION FOR UK RESIDENTS

The reference to GDPR should also be read as a reference to UK GDPR.

Data Cloud – Google and Apple

The Application provides each User with the option to link their user account to one of the two data clouds provided by Google Ltd. or Apple Inc. The User can voluntarily associate and register the Application with the chosen Data Cloud provider.

To use the Data Cloud, the User must have a previously registered and active account on one of the platforms of the aforementioned providers.

The Application allows the input of various data, including Personal Data, which is stored in the Data Cloud associated with the account registered on the platform of Google Ltd. or Apple Inc.

- [Google account linking](#)
- Apple [account](#) linking

The Data Controller does not have access to the data saved in the Data Cloud through the Application, including Personal Data, and in this respect, the proper controller is Google Ltd. or Apple Inc.

What Personal Data will be collected in the Cloud?

The User voluntarily and independently determines the categories and level of detail of any data, including Personal Data, entered into the Application and saved in the Data Cloud. The Personal Data can include data such as phone number, email address, home address, or health information. Therefore, a User should familiarise themselves with the privacy policy of Google Ltd. or Apple Inc. regarding data processing principles in the Data Cloud.

- [Google Ltd. Privacy Policy](#)
- [Apple Inc. Privacy Policy](#)

META

Recognising the importance of User privacy, the Data Controller also protects Users who have provided Personal Data to the Data Controller using other communication channels, i.e., websites and any sites marked or co-branded by Meta (including subdomains, international versions, applications, widgets, and mobile versions), whose operating rules are based on regulations provided particularly at Meta Platforms Inc. or Meta Platforms Ireland Limited Terms (“Meta Products”), including in connection with conducting advertising campaigns and configuring the SDK (Software Developer Kit) with the application, which enables reaching interested Users, tracking actions taken by Users in the Application, and measuring advertising campaign results.

The principles of protection and use of Personal Data by Meta Products are available, for example, at: [Meta Privacy Policy](#). The Data Controller has no influence on the content of the legal regulations of Meta Products, including those concerning Personal Data.

LegacyApp Gold Service

Within the Gold Service, the User may provide additional information about the Beneficiary and Substitute Beneficiaries, enabling the Data Controller to make direct contact with these persons. This information may include in particular: full name, email address, phone numbers, social media account identifiers enabling contact, postal addresses, and messaging app identifiers (e.g. WhatsApp, Telegram, Signal, Viber).

Where the Data Controller processes personal data of Beneficiaries and Substitute Beneficiaries obtained from the User, the Data Controller fulfils its information obligation pursuant to Article 14 GDPR as a rule.

At the same time, in order to ensure the correct and intended operation of the service, the provision of this information may be deferred until contact is made with the Beneficiary or Substitute Beneficiary, where earlier fulfilment of the information obligation could hinder the delivery of the service (pursuant to Article 14(5)(b) GDPR). This applies in particular to situations where premature disclosure of information could affect relationships between persons indicated by the User or disrupt the intended manner of information transfer.

The Data Controller provides the required information no later than at the time of the first successful contact with the Beneficiary or Substitute Beneficiary.

5. Rights of the Data Subjects

Every person whose data is processed has a number of rights under the GDPR.

- **Right to access personal data:** You have the right to obtain from us (as the Data Controller) confirmation as to whether or not your Personal Data is being processed, and, if that is the case, access to the Personal Data and a range of related information.
- **Right to rectification:** You have the right to have us rectify your personal data that is incorrect without undue delay. You also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- **Right to erasure:** You have the right to have us erase your data without undue delay, and we are obliged to erase personal data without undue delay if one of the following grounds applies:
 - Your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - You have withdrawn consent on which the processing is based and there is no other legal ground for the processing;
 - You object to the processing and there are no overriding legitimate grounds for the processing;
 - Your personal data have been unlawfully collected or processed;
 - Your personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
 - Your personal data have been collected in relation to the offer of information society services.
- Despite the above grounds for erasure, under the GDPR, your data may not be erased if their processing is necessary:
 - For exercising the right of freedom of expression and information;
 - For compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
 - For reasons of public interest in the area of public health;
 - For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing;
 - For the establishment, exercise, or defence of legal claims.
- **Right to restriction of processing:** You have the right to request the Data Controller to restrict processing where one of the following applies:
 - You contest the accuracy of the Personal Data, for a period enabling the Data Controller to verify the accuracy of the Personal Data;
 - The processing is unlawful and you oppose the erasure of the Personal Data and request the restriction of their use instead;
 - The Data Controller no longer needs the Personal Data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
 - You have objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.
- **Right to object:** You have the right to object at any time, on grounds relating to your particular situation, to the processing of Personal Data concerning you based on the legitimate interest of the Data Controller or when the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller, including profiling based on those provisions. In the event of an objection, we shall no longer process the Personal Data unless we demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

- **Right to data portability:** You have the right to receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit such data to another data controller without hindrance from us if:
 - the processing is based on consent or on a contract, and
 - the processing is carried out by automated means. The right to have the personal data transmitted directly from one data controller to another, where technically feasible, shall be exercised without adversely affecting the rights and freedoms of others.
- **Right to withdraw consent:** If your Personal Data is processed based on consent, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. In case of withdrawal of consent, we have the right to continue processing Personal Data if it is necessary:
 - For exercising the right of freedom of expression and information;
 - For compliance with a legal obligation which requires processing by Union or Member State law to which the Data Controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
 - For reasons of public interest in the area of public health;
 - For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing;
 - For the establishment, exercise or defence of legal claims.
- **Right to lodge a complaint:** You are entitled to lodge a complaint to the relevant supervisory authority regarding our actions as a Data Controller in relation to your Personal Data. You can find a list of local authorities responsible for data protection across the EU and their contact details at: https://edpb.europa.eu/about-edpb/board/members_en. The relevant public authority in the UK is the Information Commissioner's Office <https://ico.org.uk/global/contact-us/>. The relevant public authority in Switzerland is the Federal Data Protection and Information Commissioner (FDPIC) <https://www.edoeb.admin.ch/edoeb/en/home/dereedoeb/kontakt.html>. Of course, we encourage you to first contact us at iod@legacy.app.

Information on Data Processing Outside the EEA (European Economic Area)

Your Personal Data may be processed outside the EEA in specific cases. In the case of LegacyApp P.S.A., such data may be transferred to the USA in connection with the use of Microsoft 365 services for electronic communication; data may also be transferred to the provider's servers in the USA.

Additionally, Personal Data may be processed by entities operating under the Meta brand, by LinkedIn (LinkedIn Ireland Unlimited Company), as well as by Google Ltd. or Apple Inc. if the User uses their individual account to collect data and log into the Application or when a User creates a back-up copy of the notes saved in the Application on the relevant Data Cloud. The Data Controller is not responsible for Personal Data processed by Google Ltd., Apple Inc., and their partners. In every case, any data transfer is legally based on the Data Privacy Framework document, and in specific cases, on the basis of Standard Contractual Clauses. Each of the providers ensures an adequate level of security for such transfer. More information on this subject below:

- Google Ltd. - <https://support.google.com/adspolicy/answer/10042247?hl=en>
- Apple Inc. - <https://www.apple.com/legal/privacy/en-ww/>
- Microsoft Ltd. - <https://www.microsoft.com/en-us/trust-center/privacy/gdpr-faqs>
- META - <https://www.facebook.com/privacy/policy>
- LinkedIn - <https://www.linkedin.com/legal/privacy-policy>

6. Security of Using the Website

We inform you that LegacyApp P.S.A. applies all necessary technical and organisational measures to ensure the maximum level of protection for individuals using the company's website and Application. To guarantee the highest level of security for using the websites, these are accessed with SSL code. The website may contain appropriate links to other websites, especially in terms of making payments for our services (websites) or other means of communication (radio, television, press, outdoor advertising, etc.). Therefore, the Data Controller is not

responsible for the privacy practices that will apply on these websites or any other means of communication, other than its own website and its own communication with you. The Data Controller is not responsible for the availability of any services or goods provided through websites or other means of communication to which links may be found on its website. The Data Controller is also not responsible for any damages resulting or which may result from the use of such websites or other means of communication.

7. Cookies

When using our website, Cookies are processed. We divide the cookies we use into three categories:

1. Necessary (technical) – always active, required for the proper functioning of the website (including user session management, CSRF tokens, and system cookies). These do not require consent pursuant to Section 399(3) of the Electronic Communications Law.
2. Analytical – require your active consent (opt-in), disabled by default. We use Google Analytics 4 to analyse traffic and user behaviour on our website. Cookies in this category: `_ga`, `_ga_*`, `_gid`, `_gat`.
3. Marketing – require your active consent (opt-in), disabled by default. We use Google Ads, Meta Pixel (Facebook / Instagram) and the LinkedIn Insight Tag to measure ad performance and display content tailored to user behaviour. Cookies in this category: `_fbp`, `fr`, `tr` (Meta) and `lidc`, `bcookie`, `bscookie`, `li_gc`, `UserMatchHistory`, `AnalyticsSyncHistory` (LinkedIn). Withdrawing consent results in the automatic removal of these cookies from your browser.

The legal basis for the transfer of data outside the EEA is the European Commission's decision on the Data Privacy Framework, and in specific situations, Standard Contractual Clauses.

Before loading any analytical or advertising scripts, our website applies Google Consent Mode v2, which blocks data collection by our analytics and marketing tools (including GA4, Google Ads, Meta Pixel and the LinkedIn Insight Tag) until you have given your consent in the cookie banner. Consent given on one *.legacy.app subdomain is shared across all subdomains of the service and remains valid for 6 months.

8. Cookie Management

You can change your cookie preferences at any time by clicking the "Cookie Settings" link available in the footer of the website. This allows you to independently manage consents for individual categories (Analytical, Marketing). Withdrawing consent results in the automatic removal of the associated cookies from your browser – an operation performed client-side, without any server-side action. Withdrawing consent does not affect the lawfulness of processing carried out prior to withdrawal.

Below we provide instructions for configuring each of the browsers.

- [Internet Explorer](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Chrome](#)
- [Opera](#)
- [Safari](#)

9. Final Provisions

The use of the Data Controller's website and Application and the provision of your Personal Data is entirely voluntary.. LegacyApp P.S.A. reserves the right to change this Policy at any time due to any change in the scope of services it provides and to adapt to any changes in applicable law. In each case, we will endeavour to inform you about any update, or changes, to this Policy before its introduction.

Last update of the Privacy Policy: 12 June 2026