

Privacy Policy

GrowthTracker (hereinafter GrowthTracker, "we", "our", "us"), legal entity no. GrowthTracker, as the responsible for data processing in relation to our services (controller), is firmly committed to the privacy and rights of data subjects.

We have developed this Privacy Policy to explain how we handle your personal data when you visit our website, in accordance with the provisions of the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, hereinafter "GDPR") and other applicable legislation.

The aim of this policy is to inform you about the way we process your personal data, the cases in which the provision of personal data is necessary, the periods for which we keep personal data, the categories of personal data we process, the purposes and legal basis of the processing, the transmission of data and international transfers, the rights of data subjects and how you can contact us.

Processing of personal data

The GDPR defines "personal data" as 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, electronic identifiers, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

We are committed to keep your data protected. In order to do so, we implement technical and organisational measures appropriated to ensure their security and to prevent their improper dissemination, loss, and use, as well as against their unauthorized access, or any other form of illegal processing, such as the creation and implementation of data protection policies and the adoption of IT security solutions and network systems. Notwithstanding, users must adopt additional appropriate security measures to ensure that their devices are properly protected.

Required Information

The access and use of our website does not depend on the provision of personal data. You will only have to provide us with personal data if you subscribe to our services or if you wish to contact us. We will inform you during the data entry process when personal information must be provided for the relevant service (for example, by indicating "mandatory field"). If you choose not to provide them, we may not be able to provide the services or information requested.

Period of storage

We keep personal data in an identifiable format for the shortest period necessary to fulfil the purposes pursued by the processing of personal data. After this period, we will stop processing the personal data, which we will delete at periodic intervals, unless continued processing and storage are required by law (mainly because it is necessary to fulfil a legal obligation or for the establishment, exercise or defence of legal claims) or unless you grant us extended consent.

Categories of data, purposes and legal basis for processing

1. To provide the requested services

If you decide to subscribe to our services, you must create a user account and provide us with personal data. We will process your personal data for the purpose of providing the services you have requested and based on the need to performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. We may also process your data for the purposes of our legitimate interests in processing users' information efficiently, and the legitimate interests of our users in the provision of the services requested by them. The processed data includes identification data (name), contact data (e-mail address), access data (password), payment information and tax identification number (optional).

We will retain such personal data during the processing of your request and only for the time strictly necessary to fulfil that purpose. If the request is made by a person who have subscribed to our services, we may retain the personal data for the duration of the contractual relationship or for a longer period, if continued processing and storage are required by law (mainly because it is necessary to fulfil a legal obligation, for example, or for the establishment, exercise or defence of legal claims) or if the data subject grant us extended consent.

You may request deletion of your account at any time. No more than 180 days after such request, we will disable the account and delete all your data from the account, except the data that must be retained to comply with legal obligations. Once the maximum retention period for any data has elapsed, the data is rendered unrecoverable.

2. To respond to your requests

If you send us any request, namely for information or any clarification, we will process your personal data to respond to your request. The legal basis is our legitimate interest in managing the contract and responding to your requests, as well as, when applicable, the need to performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. The processed data includes identification data (name), contact data (e-mail address), and the content of the communication you send to us.

We will retain such personal data during the processing of the request and until personal data are no longer necessary for the fulfilment of that purpose, unless continued processing and storage are required by law (mainly because it is necessary to fulfil a legal obligation or for the establishment, exercise or defence of legal claims) or unless you grant us extended consent.

3. To comply with legal obligations

For the compliance with various legal obligations with which we must comply, we process your data on the basis of the compliance with said legal obligations, such as our legal obligations regarding invoices and accounting management, which may include identification data and payment information and will be stored for 10 years.

Transmission of personal data and international transfers

We do not transmit your personal data to third parties, except if the transmission is necessary for us to provide you with the requested services or to comply with legal obligations to which we are subject. We may share personal data of our website users with our external service providers, namely payment providers, IT providers, legal and administrative services, and website hosting, as well as with public authorities in compliance with legal obligations. Due to the technical procedures involved in transmitting information over the Internet, the transmission of access data to external content providers is unavoidable. External content providers are responsible for the privacy-compliance of the IT systems which they use.

We may transfer data to third countries, which are countries outside the European Union, within the scope of the purposes set forth in this Privacy Policy and in strict compliance with legal requirements. The transmission will be made if we believe, in good faith, that it is necessary to provide the requested services, for reasons related to legal requirements, with the protection of our clients, for example, to avoid spam or attempts to defraud users, or even to help prevent serious injury or loss of life, to the operability and maintenance of the security of our services, including preventing or stopping an attack on our computer systems or networks.

In any case, data transfers to third countries will be done with respect for the fundamental rights, freedoms and interests of the data subjects, and based on one of the following legal basis: if the transmission serves the purpose of performing the contract with you, if we obtain your consent, if the transmission is required for asserting, exercising or defending legal claims, if any of the derogations provided for in Article 49 GDPR apply, if there is an adequacy decision of the European Commission, or if adequate safeguards are ensured in compliance with legal provisions.

Rights of the data subject

As a data subject, you have the following rights:

1. Right of access

At any time, you have the right to obtain confirmation from us whether personal data concerning you are being processed and, where appropriate, access such data and the information listed on Article 15 GDPR.

2. Right to rectification

As a data subject, you have the right to obtain the rectification of inaccurate personal data concerning you without undue delay. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

3. Right to erasure ("right to be forgotten")

You have the right to obtain the erasure of your personal data without undue delay in certain circumstances provided for by law, including if your personal data are no longer necessary for the purpose for which they were collected or shall you decide to withdraw your consent (if that is the legal basis for the processing, and where there is no other legal ground for the processing). This right may be limited in certain situations, including if the processing is necessary for the establishment, exercise or defence of legal claims and the compliance with a legal obligation which requires processing.

4. Right to restriction of processing

You have the right to obtain restriction of the processing of your personal data in certain situations provided for by law. Among these situations are the cases in which you contest the accuracy of your personal data, for a period enabling us to verify its accuracy, and the cases in which you have objected the processing, until it is verified whether our legitimate grounds override yours.

5. Right to data portability

If the processing is based on consent or on a contract to which the data subject is a party, you have the right be provided with these data in a structured, commonly used, and machine-readable format. You also have the right to have the personal data transmitted directly by us to another controller where technically feasible.

6. Right to object

If we process your personal data for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing purposes with effect for the future, including profiling, insofar as it relates to such marketing. In this case, we will no longer process your data for this purpose.

You also have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you if the processing is based on our legitimate interests or on the legitimate interests of third parties. In this event, we will no longer process the personal data, unless there are compelling legitimate grounds for such processing which override the interests, rights and freedoms of the data subject, or the processing is necessary for the establishment, exercise or defence of legal claims.

7. Right to withdraw consent

Where processing is based on consent, you have the right to withdraw your consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal. In this case, and unless there is another legal ground which requires or permits it, such as compliance with a legal obligation or a contract to which the data subject is a party, your personal data will no longer be processed.

8. Right to lodge a complaint

As a data subject, you also have the right to lodge a complaint with the supervisory authority about matters regarding the processing of your personal data. In Portugal, the supervisory authority is the Comissão Nacional de Protecção de Dados (National Data Protection Commission). For more information, please visit www.cnpd.pt.

You may exercise your rights by sending us an e-mail to the address indicated below. For this purpose, we may require additional information to verify your identity. The exercise of rights is free of charge, unless the request is obviously ungrounded, excessive or repeated.

How can you contact us?

If you have any questions or need more information about the way we process your personal data or your rights as a data subject, please contact us through the following channels:

E-mail: dpo.growth.tracker.21@gmail.com

Letter: Rua Melote de Baixo, 268 R/C Esq. 4620-218 Lousada, Portugal

Changes to this Privacy Policy

We may revise and update this Privacy Policy from time to time, without prior notice and with immediate effect. Therefore, we encourage you to periodically review this Privacy Policy.