

# Privacy Policy

vulcode.com · hello@vulcode.com

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**Last updated:** 18 May 2026

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## 1. Data Controller

The controller of your personal data is **Michał Fox**, operating under the "VulCode" brand (hereinafter: "VulCode", "we", "us"), correspondence address: ul. Mackiewicza 25/44, Kraków, Poland, email: [hello@vulcode.com](mailto:hello@vulcode.com).

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## 2. Data We Collect

Depending on how you use our services, we may collect the following data:

### Contact and identification data:

- Full name / company name
- Email address
- Phone number (if voluntarily provided)

### Technical data (analytics):

- IP address (anonymised)
- Browser type and version
- Operating system
- Pages visited and time of visit
- Scroll depth

### Form data:

- Content of contact messages
  - Email address and category preferences (newsletter subscription)
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### 3. Purpose and Legal Basis for Processing

| Purpose                                              | Legal basis                                   |
|------------------------------------------------------|-----------------------------------------------|
| Performance of the ordered service                   | Art. 6(1)(b) GDPR (performance of a contract) |
| Communication regarding an Order                     | Art. 6(1)(b) GDPR                             |
| Sending newsletters                                  | Art. 6(1)(a) GDPR (consent)                   |
| Website analytics (in-house, no third-party cookies) | Art. 6(1)(f) GDPR (legitimate interest)       |
| Compliance with legal obligations (e.g. invoicing)   | Art. 6(1)(c) GDPR                             |

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### 4. Newsletter

4.1. Newsletter subscription is voluntary and requires confirmation of the email address (double opt-in).

4.2. You may unsubscribe at any time by clicking the "Unsubscribe" link in any message, or by contacting us at [hello@vulcode.com](mailto:hello@vulcode.com).

4.3. A subscriber's email address is retained until the subscription is cancelled or a deletion request is received.

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### 5. Analytics — In-House System

5.1. Vulcode.com uses its own analytics system (without Google Analytics or any other third-party tracking tools).

5.2. We collect only statistical data (visits, device type, pages) necessary to improve the quality of the service. Data are anonymised and do not allow the identification of any individual.

5.3. We do not use cookies for advertising purposes or user profiling.

5.4. The site does not set any cookies — we use browser storage only. A full list of the data stored and how to remove it is set out in the Cookie Policy.

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### 6. Data Sharing

6.1. We do not sell your personal data.

6.2. Data may be transferred only to entities strictly necessary for the performance of the service (e.g. hosting server, email provider) under appropriate data processing agreements.

6.3. Data may be disclosed to public authorities solely on the basis of applicable law.

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## 7. Data Retention

- Client data (in connection with the performance of Orders): for the duration of the contract and 5 years after its termination (tax and accounting requirements).
  - Newsletter subscriber data: until cancellation of the subscription.
  - Analytics data: up to 24 months.
  - Contact form data: up to 12 months from the last contact.
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## 8. Your Rights

You have the following rights in relation to the processing of your personal data:

- **Right of access** — you may request information about the data being processed.
- **Right to rectification** — you may request the correction of inaccurate data.
- **Right to erasure** — you may request the deletion of your data ("right to be forgotten").
- **Right to restriction of processing** — you may request that processing be restricted.
- **Right to data portability** — you may receive your data in a structured format.
- **Right to object** — you may object to processing based on legitimate interest.
- **Right to withdraw consent** — where processing is based on consent, you may withdraw it at any time.

To exercise any of your rights, please contact us: [hello@vulcode.com](mailto:hello@vulcode.com)

You also have the right to lodge a complaint with the competent supervisory authority for data protection in your country.

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## 9. Data Security

9.1. We apply technical and organisational security measures appropriate to the risk, including connection encryption (HTTPS), access controls, and regular backups.

9.2. In the event of a personal data breach, we will notify you and the competent supervisory authority in accordance with applicable law.

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## 10. Changes to the Privacy Policy

We will inform you of material changes to this Policy by updating the date at the top of this document and, where appropriate, by email.

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## 11. Contact

**VulCode** Email: [hello@vulcode.com](mailto:hello@vulcode.com) Website: <https://vulcode.com>

## Spam protection (Cloudflare Turnstile)

To protect the forms on the site (including the contact form) against spam and abuse, we use **Cloudflare Turnstile**, provided by Cloudflare, Inc. (USA). For this purpose Cloudflare, acting as a processor, may process technical data, including your IP address and browser behaviour signals, solely to distinguish human traffic from automated traffic. This mechanism may store a technical token in your browser that is necessary for it to work; it is not used for tracking or profiling. The legal basis is our legitimate interest (Art. 6(1)(f) GDPR) in protecting the site against abuse.