

# Privacy Policy

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## MS Aesthetic Clinic sp. z o.o.

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- ul. Gieldowa 4/u1, Warsaw, Poland
- KRS: 0001184673 | NIP: 5273173877 | REGON: 542270168
- [kontakt@msaesthetic.pl](mailto:kontakt@msaesthetic.pl) | +48 537 918 875
- [www.msaesthetic.pl](http://www.msaesthetic.pl)

Effective date: January 1, 2026

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## 1. General Provisions

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1. The data controller is MS Aesthetic Clinic sp. z o.o., ul. Gieldowa 4/u1, Warsaw, Poland, KRS: 0001184673, NIP: 5273173877 (hereinafter: the "Controller" or the "Clinic").
2. Contact the Controller regarding personal data: [kontakt@msaesthetic.pl](mailto:kontakt@msaesthetic.pl).
3. The Controller processes personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) and applicable Polish law.
4. This privacy policy applies to the website [msaesthetic.pl](http://msaesthetic.pl) and all services provided by the Clinic.

## 2. Purposes and Legal Bases for Processing

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The Controller processes personal data for the following purposes:

1. **Performance of services and contracts** (Art. 6(1)(b) GDPR): appointment bookings, treatments, sale and redemption of gift vouchers, payment processing.
2. **Legal obligations** (Art. 6(1)(c) GDPR): medical records, invoicing, tax reporting.
3. **Legitimate interests of the Controller** (Art. 6(1)(f) GDPR): website analytics and improvement, legal claims defense, direct marketing of own services.
4. **Consent** (Art. 6(1)(a) GDPR): newsletter, email and SMS marketing communications, analytics and advertising cookies.

### Scope of Data Collected

Depending on the service, the Controller may collect:

- First and last name
- Email address
- Phone number
- Billing details (company name, tax ID, address)
- Voucher data: recipient name, recipient phone number, personal dedication, buyer email
- Payment data (processed by Stripe)
- Appointment and treatment records
- Technical data: IP address, browser information, cookie data

## 3. Data Protection Methods

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1. The Controller implements technical and organizational measures to protect personal data, including:
  - a. SSL/TLS encryption for all connections.

- b. Regular data backups.
- c. Access restricted to authorized personnel only.
- d. Regular software and system updates.

## 4. Hosting

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1. The website msaesthetic.pl is hosted by Vercel Inc., 340 S Lemon Ave #4133, Walnut, CA 91789, USA.
2. Vercel processes technical data necessary to serve the website (IP address, browser data).

## 5. Third Party Data Processors

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The Controller uses the following services that process personal data on behalf of the Controller:

### Stripe (payments)

- Stripe Payments Europe Ltd., 1 Grand Canal Street Lower, Dublin 2, Ireland / Stripe Inc., San Francisco, USA
- Purpose: processing card payments, BLIK, Przelewy24
- Data: payment card details, email address, transaction amount
- Privacy policy: <https://stripe.com/privacy>

### Supabase (database and file storage)

- Supabase Inc., San Francisco, USA
- Purpose: storing voucher, order, and user data; file storage (e.g., voucher graphics)
- Data: order data, buyer and recipient details
- Privacy policy: <https://supabase.com/privacy>

### Vercel (hosting)

- Vercel Inc., Walnut, CA, USA
- Purpose: website hosting, content delivery
- Data: IP address, browser data, access logs
- Privacy policy: <https://vercel.com/legal/privacy-policy>

### PostHog (analytics)

- PostHog Inc., San Francisco, USA
- Purpose: website usage analytics, service improvement
- Data: IP address, browser data, page interactions
- Privacy policy: <https://posthog.com/privacy>

### Meta Platforms Inc. (advertising pixel)

- Meta Platforms Inc., Menlo Park, CA, USA
- Purpose: ad performance measurement, remarketing
- Data: IP address, browser data, page interactions
- Privacy policy: <https://www.facebook.com/privacy/policy>

### Google (Analytics and Ads)

- Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland / Google LLC, Mountain View, CA, USA
- Purpose: website traffic analytics, advertising campaigns
- Data: IP address, browser data, page interactions
- Privacy policy: <https://policies.google.com/privacy>

## GoHighLevel (email and SMS marketing)

- HighLevel Inc., Dallas, TX, USA
- Purpose: email and SMS communications (reminders, offers, newsletter)
- Data: name, email address, phone number
- Privacy policy: <https://www.gohighlevel.com/privacy-policy>

## 6. International Data Transfers

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1. Due to the use of services provided by companies based in the United States (Stripe Inc., Supabase Inc., Vercel Inc., PostHog Inc., Google LLC, Meta Platforms Inc., HighLevel Inc.), personal data may be transferred to the USA.
2. Data transfers are carried out on the basis of Standard Contractual Clauses (SCCs) adopted by the European Commission pursuant to Art. 46(2)(c) GDPR, or on the basis of an adequacy decision (EU-US Data Privacy Framework), depending on the processor.
3. You may obtain a copy of the applicable safeguards by contacting the Controller.

## 7. Your Rights

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Under the GDPR, you have the following rights:

1. **Right of access** to your personal data (Art. 15 GDPR).
2. **Right to rectification** of inaccurate or incomplete data (Art. 16 GDPR).
3. **Right to erasure** ("right to be forgotten") (Art. 17 GDPR).
4. **Right to restriction** of processing (Art. 18 GDPR).
5. **Right to data portability** (Art. 20 GDPR).
6. **Right to object** to processing based on legitimate interest (Art. 21 GDPR).
7. **Right to withdraw consent** at any time, without affecting the lawfulness of processing carried out before withdrawal.
8. **Right to lodge a complaint** with the President of the Personal Data Protection Office (UODO), ul. Stawki 2, 00-193 Warsaw, [www.uodo.gov.pl](http://www.uodo.gov.pl).

To exercise any of the above rights, contact the Controller: [kontakt@msaesthetic.pl](mailto:kontakt@msaesthetic.pl).

## 8. Forms and Data Collection

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1. The website contains forms for: appointment booking, voucher purchases, newsletter signup, contacting the Clinic.
2. Providing data in forms is voluntary but necessary to use the relevant service.
3. The Controller does not share personal data with third parties unless required by law or necessary for service delivery (e.g., sharing data with the payment processor).

## 9. Cookies

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1. The website [msaesthetic.pl](http://msaesthetic.pl) uses cookies.
2. Cookies are used for:
  - a. Ensuring proper website functionality (essential cookies).
  - b. Analytics and statistics (PostHog, Google Analytics).
  - c. Advertising and remarketing (Meta Pixel, Google Ads).
3. You can manage cookie settings through your browser settings or the cookie panel on the website.
4. Disabling certain cookies may affect website functionality.

## 10. Data Retention

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1. Data processed for contract performance is retained for the duration of the contract and for the period required by law (e.g., 5 years for tax purposes).
2. Data processed on the basis of consent is retained until consent is withdrawn.
3. Data processed for analytics purposes is retained in accordance with the settings of each analytics tool.

## 11. Final Provisions

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1. The Controller reserves the right to update this privacy policy. The current version is always available at [msaesthetic.pl](https://msaesthetic.pl).
  2. This privacy policy is effective from January 1, 2026.
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