Privacy Policy — pmexpert.ai

(Effective from: 6 October 2026; last updated: 20 October 2026)

1. Definitions

- **Controller (We)** — MAGNUSO S.A., Plac Solny 15, 50-062 Wrocław, Poland, e-mail: biuro@magnuso.pl — the entity responsible for processing your personal data.
- **Personal data** — any information relating to a natural person who can be identified, e.g. on the basis of their first and last name, e-mail address, telephone number, order data, IP address, device data, an online identifier, or information collected by cookies and similar technologies.
- **Policy** — this Privacy Policy of the pmexpert.ai website.
- **GDPR** — 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 (General Data Protection Regulation).
- **Website** — the pmexpert.ai website and the related user platform on Circle, through which you can purchase access to content and use it.
- **Circle** — the online platform used by the Controller to handle the sales process (checkout), manage user accounts and log-ins and provide digital materials and meeting recordings.
- **User (You)** — any natural person who visits the Website or uses the services offered on it.

2. Processing of data in connection with using the Website

By using the Website, the User provides the Controller with the personal data necessary to:

- ensure the proper functioning of the Website,
- place and fulfil an order,
- create an account and enable log-in to the Circle platform,
- provide access to purchased materials, including meeting recordings,
- register you for webinars and send you the link to the webinar room and the recording,
- communicate in connection with the provision of services,
- comply with the legal obligations to which the Controller is subject.

To make full use of the purchased services (access to materials), you need an account and must log in to the Circle platform.

With your consent, we also process your data to send you our newsletter (section 3.5) and to measure the effectiveness of our advertising with the Meta Pixel (section 3.6) and the LinkedIn Insight Tag (section 3.7). If you sign up for a webinar through a form in one of our LinkedIn ads, LinkedIn passes the data you submit to us (section 3.8).

3. Purposes and legal bases of processing

3.1 Use of the Website and the platform (log-in)

We process the data provided when placing an order (your name, e-mail address, country and, optionally, business name) and the data generated while using the platform (e.g. progress in the

materials, log-in history).

- **Purpose:** provision of services by electronic means, including maintaining the user account, enabling log-in and providing access to meeting materials.
- **Legal basis:** necessity for the performance of a contract (Art. 6(1)(b) GDPR).

3.2 Payments (Circle & Stripe)

Orders are placed through the checkout on the Circle platform, and payments are processed by Stripe, which is integrated with Circle.

- Stripe receives the data necessary to initiate the transaction.
- Stripe processes your card/payment data as a separate controller.
- We receive payment confirmation from Stripe, which allows us to unlock your access to the materials on the Circle platform.
- **Legal basis:** performance of a contract (Art. 6(1)(b) GDPR) and our legitimate interest in ensuring secure payments (Art. 6(1)(f) GDPR).

3.3 Provision of materials and meetings

Within the Circle platform, we process data in order to publish and provide access to digital materials and recordings of meetings in which you participate.

- **Legal basis:** performance of a contract (Art. 6(1)(b) GDPR).

3.4 Webinars (ClickMeeting)

Registration for our webinars and the webinars themselves are handled by ClickMeeting (ClickMeeting Sp. z o.o., Gdańsk, Poland), which processes the data on our behalf. We process the data you enter in the registration form (e.g. your name and e-mail address) and data relating to your participation in the webinar.

- **Purpose:** registering you for the webinar and sending you the link to the webinar room and the recording.
- **Legal basis:** performance of a contract for the provision of a free webinar (Art. 6(1)(b) GDPR).

3.5 Newsletter (MailerLite)

If you subscribe to our newsletter, we process your e-mail address to send you the Magnuso newsletter with information about AI in a product manager's work and about our courses. The newsletter is sent via MailerLite, which processes the data on our behalf.

- **Legal basis:** your consent (Art. 6(1)(a) GDPR). You can withdraw it at any time, e.g. by clicking the unsubscribe link in any newsletter e-mail.

3.6 Cookies and Meta Pixel

The Website uses the Meta Pixel, a tool provided by Meta Platforms Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland). With your consent, the Pixel stores cookies in your browser and sends Meta information about your visit, such as the pages you view, actions you take on the Website (e.g. clicking the purchase button or signing up for the newsletter), your IP address, browser and device data and cookie identifiers.

- **Purpose:** measuring the effectiveness of our ads on Facebook and Instagram and showing our ads to people who have visited the Website.
- **Legal basis:** your consent (Art. 6(1)(a) GDPR), given in the cookie banner. You can withdraw it at any time by changing your cookie settings.
- **Joint controllership:** we and Meta Platforms Ireland Limited are joint controllers (Art. 26 GDPR) for the collection of this data on the Website and its transmission to Meta. The essence of this arrangement is set out in Meta's Controller Addendum. After transmission, Meta processes the data as an independent controller under its own Privacy Policy.

3.7 LinkedIn Insight Tag

The Website uses the LinkedIn Insight Tag, a tool provided by LinkedIn Ireland Unlimited Company (Wilton Plaza, Wilton Place, Dublin 2, Ireland). With your consent, the Insight Tag stores cookies in your browser and sends LinkedIn information about your visit, such as the pages you view, your IP address, browser and device data and a pseudonymous identifier of your LinkedIn account. We see only aggregated statistics, not which LinkedIn members visited the Website.

- **Purpose:** measuring the effectiveness of our ads on LinkedIn, aggregated statistics about visitors to the Website and showing our ads on LinkedIn to people who have visited the Website.
- **Legal basis:** your consent (Art. 6(1)(a) GDPR), given in the cookie banner. You can withdraw it at any time by changing your cookie settings.
- **LinkedIn's role:** LinkedIn processes this data under its Data Processing Agreement for advertisers and its Privacy Policy. According to LinkedIn, information that directly identifies a member is removed within 7 days and the remaining pseudonymised data is deleted within 180 days.

3.8 Webinar sign-ups through LinkedIn forms

If you sign up for one of our webinars through a form shown in our ad on LinkedIn (LinkedIn Lead Gen Form), LinkedIn passes us the data you submit in the form (e.g. your first name and e-mail address) and your answer to the consent checkbox, together with technical details of the submission (the form, the campaign and the time of submission). Some fields may be pre-filled from your LinkedIn profile; you can change them before submitting the form. The data is transferred from LinkedIn to our systems by the automation service Zapier (Zapier, Inc., USA), and we then register you for the webinar in ClickMeeting (section 3.4).

- **Purpose:** registering you for the webinar and sending you the link to the webinar room and the recording; with the consent given in the form, also sending you our newsletter (section 3.5).
- **Legal basis:** performance of a contract for the provision of a free webinar (Art. 6(1)(b) GDPR) and, for the newsletter, your consent (Art. 6(1)(a) GDPR).
- **LinkedIn's role:** how LinkedIn itself processes the data of its members is described in LinkedIn's Privacy Policy.

4. Recipients of data

We may share your data in particular with:

- Circle — to handle the checkout, manage user accounts and provide access to materials,
- Stripe — to the extent necessary to process and settle payments,

- ClickMeeting — to handle webinar registration and run the webinars,
- MailerLite — to send the newsletter,
- Meta Platforms Ireland Limited — in connection with the Meta Pixel (see section 3.6),
- LinkedIn Ireland Unlimited Company — in connection with the LinkedIn Insight Tag and the sign-up forms in our LinkedIn ads (see sections 3.7 and 3.8),
- Zapier — to transfer sign-ups from LinkedIn forms to our systems (see section 3.8),
- entities providing IT / hosting services to us,
- an accounting firm — for bookkeeping purposes (invoices for purchases),
- public authorities — where required by law.

5. Transfers of data outside the EEA

Some of our service providers process data in the United States, i.e. outside the European Economic Area (EEA).

- **Circle** (CircleCo, Inc.) processes data on our behalf in the United States. The transfer is based on the standard contractual clauses adopted by the European Commission (Commission Implementing Decision (EU) 2021/914), pursuant to Art. 46(2)(c) GDPR.
- **MailerLite** (MailerLite, Inc.) stores newsletter data in data centres in the European Union. As a US company, it processes the data under the standard contractual clauses adopted by the European Commission.
- **ClickMeeting** uses service providers based mainly in Poland and other EEA countries. According to ClickMeeting's privacy policy, any transfers outside the EEA rely on adequacy decisions, standard contractual clauses or the EU-U.S. Data Privacy Framework.
- **Stripe** processes payment data as a separate controller and is responsible for its own transfers of data outside the EEA. According to Stripe's Privacy Policy, these transfers rely on adequacy decisions, the EU Standard Contractual Clauses and the EU-U.S. Data Privacy Framework.
- **Meta**: data collected by the Meta Pixel may be transferred to Meta Platforms, Inc. in the United States, which is certified under the EU-U.S. Data Privacy Framework.
- **LinkedIn**: data collected by the LinkedIn Insight Tag and through LinkedIn forms may be transferred to LinkedIn Corporation in the United States, which participates in the EU-U.S. Data Privacy Framework. LinkedIn also relies on standard contractual clauses.
- **Zapier** (Zapier, Inc.) transfers sign-ups from LinkedIn forms on our behalf in the United States. Zapier is certified under the EU-U.S. Data Privacy Framework, and its data processing addendum contains the standard contractual clauses.

You can obtain a copy of the safeguards we apply by contacting us (see section 8).

6. Data retention period

We store your data:

- for as long as you hold an account on the Circle platform — until you request deletion of the account or until the provision of services ends,

- webinar registration data, including sign-ups through LinkedIn forms — for the time needed to organise the webinar and send you the recording; in LinkedIn's advertising tools, sign-ups from LinkedIn forms are available to us for 90 days, after which LinkedIn deletes them,
- newsletter data — until you unsubscribe or otherwise withdraw your consent,
- Meta Pixel and LinkedIn Insight Tag cookies — until you withdraw your consent or delete the cookies in your browser,
- for the purpose of fulfilling legal obligations (tax and accounting) — for 5 years from the end of the year in which the sale took place,
- until consent is withdrawn or an objection is upheld.

7. Your rights

You have the right to access your data, to have it rectified or erased (the "right to be forgotten"), to restrict its processing and to data portability. You also have the right to object and the right to lodge a complaint with the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych) in Poland.

Where we process your data on the basis of your consent, you may withdraw it at any time. Withdrawal does not affect the lawfulness of processing carried out before it.

8. Contact

For matters relating to the protection of personal data, you can contact us at:

MAGNUSO S.A.
Plac Solny 15
50-062 Wrocław, Poland
E-mail: **biuro@magnuso.pl**