

# Privacy Policy

Waitlistener — SaaS platform for creating waitlist pages

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## 1. Data Controller

The data controller is the operator of the **Waitlistener** service (hereinafter: the Service, the Controller). For any questions regarding the processing of personal data, please contact us via the e-mail address provided on the Service's homepage or in the Contact section.

## 2. Scope and Purpose of Data Processing

### 2.1. Data collected from admin panel users

When registering an account in the Waitlistener panel, we collect the following data:

- e-mail address (required for login and communication)
- first name or display name (optional, in the account profile)
- billing data when selecting a paid plan (handled by the payment processor Stripe — we do not store card numbers)
- technical session data: IP address, session identifier, timestamp

Legal basis (GDPR): Art. 6(1)(b) — performance of a contract (provision of the Service); Art. 6(1)(f) — legitimate interests of the Controller (security, fraud prevention).

### 2.2. Data collected from waitlist subscribers

Individuals signing up to waitlists created by our users (hereinafter: Subscribers) provide at minimum an e-mail address, and optionally additional fields configured by the waitlist owner (e.g. phone number, text answer).

In this relationship, the **waitlist owner acts as a separate data controller** for Subscriber data; Waitlistener acts as a **data processor** on their behalf, pursuant to Art. 28 GDPR. The waitlist owner is responsible for informing Subscribers about the rules of data processing.

Legal basis: Art. 6(1)(b) GDPR (performance of contract with the waitlist owner); a Data Processing Agreement (DPA) is available upon request.

### 2.3. Analytical and technical data

We collect anonymous or pseudonymised data about traffic on public waitlist pages:

- referring page URL (referrer\_url) — for analytical purposes
- number of visits per waitlist page
- session cookies (necessary for the Service to function)

We do not use cookies for advertising purposes. If we use analytics tools (e.g. Google Analytics GA4), this is done on the basis of separate consent or legitimate interest, with the option to opt out.

### 3. Data Retention

Admin panel account data is retained for the duration of the contract (active account) and for **3 years** after its termination (legal obligations, claims).

Subscriber data is retained until a deletion request is made by the waitlist owner or the Subscriber, and no longer than **5 years** from the last activity, unless a longer period is required by law.

Technical data (server logs, e-mail campaign logs) is retained for **12 months**.

### 4. Sharing Data with Third Parties

We do not sell personal data. We may share data with the following categories of recipients:

- **IT service providers:** hosting infrastructure (VPS, Docker), databases (MySQL), cache/queue (Redis) — under data processing agreements.
- **Payment processors:** Stripe Inc. — transaction processing; their own privacy policy: [stripe.com/privacy](https://stripe.com/privacy).
- **E-mail service providers:** Brevo or Resend — sending messages to Subscribers on behalf of the waitlist owner.
- **Google Analytics:** anonymous analytical data (GA4), if the feature is enabled.
- **Public authorities:** only when required by law or court order.

*All sub-processors have been selected in compliance with GDPR and CCPA requirements. A list of current sub-processors is available upon request.*

### 5. Data Transfers Outside the EEA

Some of our providers (e.g. Stripe, Google, Resend) may process data in the USA or other countries outside the European Economic Area. Transfers take place with appropriate safeguards, in particular:

- Standard Contractual Clauses (SCC) approved by the European Commission
- Adequacy decisions, where applicable
- EU-U.S. Data Privacy Framework (DPF) certification, where the provider holds it

### 6. Rights of Data Subjects (GDPR)

The following rights apply to individuals whose data we process:

- **Right of access** to data (Art. 15 GDPR)
- **Right to rectification** of data (Art. 16 GDPR)
- **Right to erasure** (“right to be forgotten”, Art. 17 GDPR)
- **Right to restriction of processing** (Art. 18 GDPR)
- **Right to data portability** (Art. 20 GDPR)
- **Right to object** to processing (Art. 21 GDPR)
- **Right to withdraw consent** — at any time, without affecting the lawfulness of processing prior to withdrawal

To exercise your rights, send a message to the Controller’s e-mail address. We will respond within **30 days** of receiving the request (the deadline may be extended by a further 2 months in complex cases).

You also have the right to lodge a complaint with the competent national data protection supervisory authority (in Poland: the President of the Personal Data Protection Office, [uodo.gov.pl](https://uodo.gov.pl); in your country: the relevant national authority).

## 7. Rights of U.S. Consumers

### 7.1. California Consumer Privacy Act (CCPA / CPRA)

If you are a California resident, you have additional rights under the California Consumer Privacy Act (CCPA) as amended by the CPRA:

- **Right to know** — about categories of data collected, purposes of processing, and recipients.
- **Right of access** — to specific personal information collected in the past 12 months.
- **Right to deletion** — subject to exceptions provided by law.
- **Right to correction** — of inaccurate personal information.
- **Right to opt out of sale/sharing** — **we do not sell** personal data within the meaning of the CCPA.
- **Right to non-discrimination** — exercising your CCPA rights will not affect the level of service.

To exercise your CCPA rights, contact us at the e-mail address provided in Section 1. Identity verification may be required before fulfilling the request.

### 7.2. Virginia (VCDPA), Colorado (CPA), Connecticut (CTDPA) and other U.S. states

If you are a resident of a state with its own consumer data protection law (Virginia, Colorado, Connecticut, Texas, Nevada and others), you have similar rights to those described in Sections 6 and 7.1. Please contact us — we will handle your request in accordance with the applicable state law.

## 8. Data Security

We apply the following technical and organisational measures to protect personal data:

- Encryption of data in transit (HTTPS / TLS)
- Password hashing (bcrypt)
- Environment isolation (Docker containers, service separation)
- Role-based access control (administrator, user)
- Regular database backups
- Security event monitoring and logging

In the event of a personal data breach that may pose a risk to the rights and freedoms of individuals, we will notify the competent supervisory authority within **72 hours** of becoming aware of the breach (Art. 33 GDPR) and — where the risk is high — directly notify the affected individuals (Art. 34 GDPR).

## 9. Cookies

The Service uses cookies for the following purposes:

- **Strictly necessary:** admin panel user session, CSRF token — legal basis: necessity for the performance of a contract.
- **Analytical (optional):** Google Analytics GA4 (if enabled) — legal basis: consent or legitimate interest.

You can manage cookies through your browser settings or a dedicated consent panel, if available in the Service.

## 10. E-mail Campaigns

Waitlist owners may send e-mail campaigns to their Subscribers via the Service. Every message includes a mandatory **unsubscribe link**. Clicking the link marks the Subscriber as unsubscribed (soft unsubscribe) — the data remains in the database to prevent re-adding without consent, unless the Subscriber requests full deletion.

## 11. Children’s Data

The Service is not intended for persons under the age of **16** (or any other minimum age required by local law). We do not knowingly collect personal data from children. If you learn that a child has provided us with data without parental or guardian consent, please contact us — we will delete such data without undue delay.

## 12. Changes to the Privacy Policy

We may update this Policy from time to time. We will notify you of material changes by:

- e-mail to the address registered in the Service
- notification in the admin panel
- announcement on the Service’s homepage

Continued use of the Service after the effective date of the changes constitutes acceptance of the updated Policy. Previous versions of the Policy are available upon request.

## 13. Contact

For any questions regarding this Privacy Policy or the processing of personal data, please contact us:

- E-mail: provided on the Service’s homepage in the Contact section
- Contact form available at /panel/help

*This Privacy Policy has been prepared in accordance with Regulation (EU) 2016/679 (GDPR), the California Consumer Privacy Act (CCPA) as amended by the CPRA, and other applicable data protection laws in force in the EU and the USA. This document is for informational purposes only and does not constitute legal advice.*