

# Privacy Policy – MySpiritWay.org

Last updated: November 12, 2025

This Privacy Policy explains how we collect, use, disclose and safeguard personal data when you visit [www.myspiritway.org](http://www.myspiritway.org) (the “Website”), contact us, or use our services. We operate from Iceland and process personal data in accordance with the EU/EEA General Data Protection Regulation (“GDPR”).

## 1) Data Controller

Controller: MySpiritWay (sole proprietorship of Kamil Jan Włodarczyk)

Location: Reykjanesbær, Iceland (EEA)

Website: [www.myspiritway.org](http://www.myspiritway.org)

Contact: [contact@myspiritway.org](mailto:contact@myspiritway.org)

## 2) How We Obtain Personal Data

We collect data when you: Browse the Website (through logs, cookies, and similar technologies). Use contact forms, book calls, or otherwise communicate with us. Subscribe to updates, download resources, or purchase digital services. Interact with embedded third-party content (e.g., YouTube videos).

## 3) Categories of Personal Data

Depending on your interaction, we may process: Identification & Contact Data: name, email address, phone number. Usage & Technical Data: IP address, device and browser data, pages visited, referring URLs, time stamps, approximate location (country/region). Communications: messages you send via forms or email, and metadata required to deliver them. Transactional Data: records related to purchases of our digital services (handled by our payment processor – we do not store full payment card details).

## 4) Purposes & Legal Bases (GDPR Art. 6)

We process data only when we have a lawful basis: Provide the Website and services (legitimate interests, Art. 6(1)(f); performance of a contract, Art. 6(1)(b)). Respond to enquiries and support (legitimate interests and/or performance of a contract). Operate contact/booking forms (legitimate interests; consent where required). Analytics and performance to understand and improve content (consent for non-essential cookies; legitimate interests for aggregated, privacy-respecting metrics). Marketing communications with your consent; you can unsubscribe at any time. Legal compliance (legal obligations, Art. 6(1)(c)).

## 5) Cookies & Similar Technologies

We use essential cookies necessary for the Website to function. Non-essential cookies (e.g., analytics, embedded media, marketing) are used only with your consent where required. You can manage preferences via your browser settings and, where available, our cookie banner/manager.

## 6) Embedded Content & YouTube API

Our pages embed YouTube videos and retrieve channel content using the YouTube Data API. When you view an embedded video or our video sliders, your browser may connect to Google servers and allow Google LLC to set cookies and collect usage data according to Google’s policies. You can learn more in Google’s Privacy Policy and YouTube Terms of

Service. We do not receive or store your Google account credentials. We only load public video metadata (titles, thumbnails, durations) and display videos using standard YouTube iframes.

## 7) Website Hosting & Processors

We may use trusted service providers (processors) to host the Website and operate features, for example: Wix.com Ltd. (Israel; adequate under EU decisions). Wix may store data on servers in multiple regions. Wix implements appropriate safeguards (including Standard Contractual Clauses where applicable). Google LLC (USA and global) for YouTube services. Google relies on appropriate data transfer mechanisms, including the EU-US Data Privacy Framework and/or Standard Contractual Clauses. Email & productivity tools (e.g., Gmail/Google Workspace or similar) for communications. We maintain written agreements with processors requiring confidentiality and security.

## 8) International Transfers

If data is transferred outside the EEA/UK, we rely on adequacy decisions (e.g., Israel) or appropriate safeguards such as the European Commission's Standard Contractual Clauses. Copies of relevant safeguards can be requested via our contact email.

## 9) Data Retention

We keep personal data only as long as necessary for the purposes described, including to comply with legal, accounting, or reporting requirements. Typical retention: Contact enquiries: up to 24 months after last interaction. Client/project records: for the duration of the engagement and as required by tax and accounting laws (usually 7 years). Cookie data: according to cookie type and your preferences.

## 10) Security

We implement technical and organisational measures appropriate to the risk, including encryption in transit (HTTPS), access controls, least-privilege policies, and processor due diligence. No method of transmission or storage is 100% secure; we strive to protect your data but cannot guarantee absolute security.

## 11) Your Rights (GDPR)

Under the GDPR you may have the right to: access, rectify, erase, or restrict processing of your personal data; object to processing; and data portability. Where processing is based on consent, you can withdraw consent at any time (withdrawal does not affect prior processing). To exercise rights, email [contact@myspiritway.org](mailto:contact@myspiritway.org). We may need to verify your identity before acting on a request.

## 12) Children's Privacy

Our Website and services are not directed to children under 16. We do not knowingly collect personal data from children. If you believe a child has provided personal data, please contact us to delete it.

## 13) Complaints

If you have concerns, please contact us first. You also have the right to lodge a complaint with your local data protection authority. For Iceland, this is Persónuvernd - The Icelandic Data Protection Authority.

## **14) Changes to This Policy**

We may update this Privacy Policy from time to time. The “Last updated” date at the top indicates the latest revision. Changes are effective when posted on this page.

## **15) Contact**

For questions about this Privacy Policy or our data practices, contact:  
[contact@myspiritway.org](mailto:contact@myspiritway.org).

This document is provided for general information and does not constitute legal advice.