

PRIVACY POLICY

BLACKSPIRE CONSULTING

Effective Date: 01/01/2026

Last Updated: 01/01/2026

BLACKSPIRE CONSULTING (“Blackspire,” “we,” “us,” or “our”) respects your privacy and is committed to protecting your personal information.

This Privacy Policy explains how we collect, use, disclose, process, and safeguard personal data when you visit **blackspireconsulting.com** (the “Site”), contact us, or engage our services.

This Policy should be read together with our Terms of Service

1. WHO WE ARE (DATA CONTROLLERS)

Depending on your jurisdiction, the data controller is:

United States:

BLACKSPIRE CONSULTING LLC
1111 Brickell Ave, 10th Floor
Miami, FL, USA

European Union / Poland:

BLACKSPIRE CONSULTING HUBERT ŻMUDZIŃSKI
Św. Wojciecha 10A
Koszalin, Poland

Email: contact@blackspireconsulting.com

Phone: +1 347-284-8302 / +48 692-222-350

For purposes of GDPR, we act as a **Data Controller** when processing personal data collected via the Site.

2. PERSONAL INFORMATION WE COLLECT

We collect personal information in the following categories:

2.1 Information You Provide Directly

When you submit forms, inquiries, or otherwise interact with the Site, we may collect:

Identifiers

- Full name
- Email address
- Phone number

Professional / Business Information

- Company name
- Job title / role
- Business address
- Website
- Social media handles

Inquiry / Service Information

- Project details
- Service needs
- Budget and timeline (if voluntarily provided)
- Uploaded documents or briefs

Billing Information

- Billing name
- Billing address
- Invoice-related details

The Site does **not process online payments directly**. Payments are handled via invoice under separate agreements

Payment processors may independently collect payment card data.

2.2 Information Collected Automatically

When you visit the Site, we and our service providers may automatically collect:

- IP address
- Device identifiers

- Browser type
- Operating system
- Approximate geolocation (derived from IP)
- Pages viewed
- Session duration
- Referring URLs
- Click behavior
- Cookie identifiers

2.3 Sensitive Data

We do not intentionally collect:

- Government ID numbers
- Health data
- Biometric identifiers
- Financial account numbers (beyond invoice data)
- Children's data under 13

If such data is submitted inadvertently, please contact us for deletion.

3. CHILDREN'S PRIVACY

The Site is intended for individuals **13 years of age or older**

We do not knowingly collect personal information from children under 13. If we become aware that such data has been collected, we will delete it promptly.

4. LEGAL BASES FOR PROCESSING (GDPR)

If you are located in the European Economic Area (EEA), we process personal data under the following legal bases:

- **Consent** (e.g., marketing emails, cookies)
- **Contractual necessity** (responding to inquiries, providing services)
- **Legitimate interests** (business development, analytics, service improvement)
- **Legal obligations** (tax, accounting, compliance)

You may withdraw consent at any time.

5. HOW WE USE YOUR INFORMATION

We use personal information to:

- Respond to inquiries
- Provide consulting services
- Evaluate potential client relationships
- Send transactional communications
- Send marketing emails (with consent where required)
- Improve the Site
- Conduct analytics and performance measurement
- Detect fraud or misuse
- Comply with legal obligations

We do **not sell personal information** in exchange for monetary compensation.

6. EMAIL COMMUNICATIONS

We may send:

Transactional Emails

- Inquiry responses
- Service updates
- Invoices
- Administrative notifications

Marketing Emails

Sent only if:

- You opt in, or
- Permitted by applicable law

You may unsubscribe via the link in marketing emails.

We may use third-party email service providers (e.g., Mailchimp, Klaviyo, HubSpot, ConvertKit)

7. COOKIES & TRACKING TECHNOLOGIES

As described in our Terms , we may use:

- Cookies (session and persistent)
- Pixels/tags
- Analytics scripts
- Local storage
- Server logs

7.1 Types of Cookies

Essential Cookies

Required for website functionality.

Analytics Cookies

Used to understand user behavior (e.g., Google Analytics).

Marketing Cookies

Used for retargeting and ad performance measurement.

8. ANALYTICS & ADVERTISING

8.1 Analytics

We may use Google Analytics or similar tools to measure traffic and improve performance

These providers may collect:

- IP address
- Usage data
- Device data

You may opt out via browser tools or Google's opt-out mechanism.

8.2 Advertising & Retargeting

We may use:

- Google Ads
- Meta (Facebook) Pixel

- LinkedIn Ads
- Other advertising platforms

These tools may:

- Track site visits
- Measure campaign effectiveness
- Enable retargeting

This may involve cookie identifiers or hashed email addresses (where permitted).

We do not control third-party ad network privacy practices.

9. SHARING OF PERSONAL INFORMATION

We may share personal information with:

Service Providers

- Hosting providers
- CRM platforms
- Email providers
- Analytics providers
- Scheduling tools
- Advertising platforms

Legal Authorities

When required by law, court order, or regulatory obligation.

Business Transfers

In connection with merger, acquisition, or restructuring.

We require service providers to process data in accordance with applicable laws.

10. INTERNATIONAL DATA TRANSFERS

Because we operate in the U.S. and Poland , personal data may be transferred internationally.

Where required by law, we implement safeguards such as:

- Standard Contractual Clauses (SCCs)
- Adequacy decisions
- Contractual data protection provisions

11. DATA RETENTION

We retain personal information:

- As long as necessary for business purposes
- As required by legal obligations
- For the duration of client relationships
- As needed to resolve disputes

Marketing data is retained until you unsubscribe or withdraw consent.

12. DATA SECURITY

We implement reasonable administrative, technical, and organizational safeguards, including:

- Secure hosting
- Encryption (where applicable)
- Access controls
- Vendor due diligence

However, no system is 100% secure.

13. YOUR PRIVACY RIGHTS

13.1 GDPR Rights (EEA/UK)

You may have the right to:

- Access your personal data
- Correct inaccuracies
- Request deletion
- Restrict processing
- Object to processing
- Withdraw consent
- Data portability
- Lodge a complaint with a supervisory authority

13.2 U.S. State Privacy Rights (e.g., California)

If applicable, you may have the right to:

- Know what personal information we collect
- Request deletion
- Correct inaccurate information
- Opt out of certain data sharing
- Non-discrimination for exercising rights

To exercise rights, contact:

contact@blackspireconsulting.com

We may verify your identity before fulfilling requests.

14. DO NOT TRACK SIGNALS

As noted in our Terms , there is no uniform standard for Do Not Track (DNT) signals, and we may not respond to them.

15. THIRD-PARTY LINKS

The Site may link to:

- Scheduling tools (e.g., Calendly)
- Analytics services
- CRM tools
- Social media platforms
- Embedded content

We are not responsible for third-party privacy practices

16. CHANGES TO THIS POLICY

We may update this Privacy Policy periodically. The “Last Updated” date reflects revisions. Continued use of the Site constitutes acceptance of changes.

17. CONTACT US

For privacy-related inquiries:

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