Dupligrow Privacy Notice

This notice explains which personal data Dupligrow handles during the beta, why it is used, who controls it and how individuals can exercise their rights.

Document version	1.0
Effective date	11 September 2026
Operator	Simon Says Coaching, trading as Dupligrow
Intended reader	Workspace administrators, invited users, contacts and event participants

Dupligrow has two different privacy roles. Simon Says Coaching is the controller for Dupligrow's own account administration, security, support and beta-operation records. For most information entered into a customer workspace, the Workspace Owner is the controller and Simon Says Coaching acts only as its processor.

1 Who is responsible

Dupligrow is operated by Simon Says Coaching, trading as Dupligrow, T.v. Berkhoutstraat 4, 2032 LL Haarlem, the Netherlands, Chamber of Commerce number 71191356, VAT number NL002493598B96.

If you have a Dupligrow account, the name of your Workspace Owner is shown in or associated with your workspace. Contact the Workspace Owner first about contacts, customer records, notes, team assignments, events or other content entered in that workspace. Contact Dupligrow through https://dupligrow.com about platform account administration, security or support, or if you do not know which party to contact.

2 Information Dupligrow handles

Account and profile information

Name, email address, login and user identifiers, role, workspace, language, optional general location, profile settings, account status, invitation and activation information.

Team learning and activity information

Onboarding progress, completed learning steps, milestones, commitments, next check-ins, event activity, customer-care steps, resource actions and other meaningful workflow activity. Authorised leaders and administrators may see this information as described in the Platform User Terms.

Contact and customer workflow information

A user may enter a contact's name, how they know the person, a broad interest category, relationship stage, next action, dates and short notes. The Workspace Owner controls this information. Dupligrow does not permit medical or sensitive profiles.

Events and shared content

Event details, host information, reservations, participant names, resources, messages, updates, translations and public or private sharing links.

Technical support and security information

Support messages, acceptance records and technical information reasonably generated by authentication, WordPress, server logs and security controls, which can include date and time, IP address, browser or device information, requested page and error information.

3 Purposes and legal bases

Purpose	Typical data	Legal basis for Dupligrow as controller
Provide and administer accounts	Identity, contact, role and workspace data	Performance of the user or workspace agreement
Secure and troubleshoot the Platform	Authentication, logs, device, error and support data	Legitimate interests in security, reliability and abuse prevention
Operate and improve the beta	Feature use, feedback and aggregated usage patterns	Legitimate interests in developing and evaluating the service

Purpose	Typical data	Legal basis for Dupligrow as controller
Send operational communications	Email, role, workspace and service status	Performance of the agreement and legitimate interests
Keep legal and acceptance records	Agreement version, identity and acceptance evidence	Legal obligations and legitimate interests in establishing legal claims

The Workspace Owner chooses the legal basis for personal data it enters or directs users to enter. Depending on the situation, that may be legitimate interests, performance of an agreement, consent or another lawful basis. The Workspace Owner must provide the required information to data subjects and respect objections and opt-outs.

4 No medical or special-category records

Dupligrow is not designed or authorised for medical information or other special-category data. Users must not enter diagnoses, symptoms, medication, treatment, pregnancy, disability, test results, biomarkers, health measurements or speculation about health. They must also avoid racial or ethnic origin, politics, religion, trade-union membership, genetics, biometrics, sex-life or sexual-orientation data, criminal records, government identifiers and financial credentials.

A broad label such as “health interest” is a general conversation category, not permission to record a health condition. If prohibited information is discovered, Dupligrow and the Workspace Owner may remove or quarantine it and may restrict the relevant account.

5 Sources of information

- You provide information when you activate or update an account, use a feature, reserve an event, request support or accept an agreement.
- A Workspace Owner, Team Admin, leader or sponsor may provide your account and team-assignment information.
- An Authorised User may enter limited information about a person they know as a contact, prospect or customer.
- The Platform and hosting environment generate technical, security and workflow records when features are used.

If someone entered your name but you do not have a Dupligrow account, the relevant Workspace Owner is normally responsible for telling you about that use. Dupligrow may not know your direct contact details and processes the record only for that Workspace Owner.

6 Who receives information

- Authorised users in the same workspace, according to their role and the feature being used;
- the Workspace Owner, Team Admins and authorised leaders where they need the information for workspace administration or support;
- Cloud86 for hosted WordPress infrastructure, database, email delivery and configured backups;
- OpenStreetMap infrastructure where maps or location search are used;
- professional advisers, incident responders or authorities where necessary and lawful; and
- a successor operator if the Dupligrow service is transferred, subject to continued protection of personal data.

The Platform may embed or link to YouTube, Google Maps, Google Calendar, WhatsApp, Zoom, Spotify and other sites. When embedded content loads or you choose to open or share through those services, they may receive your IP address, page information, device information or data you choose to send. Their own privacy terms apply.

Dupligrow does not sell personal data and does not use Workspace Content to advertise to contacts entered by users.

7 International processing

The core beta hosting environment is intended to be located in the European Economic Area. Some independent third-party services, including Google or YouTube, may process information outside the EEA under their own transfer arrangements and safeguards. Avoid activating or using an optional external service if you are not authorised to provide the information it will receive.

8 Cookies and external content

Dupligrow and WordPress use essential cookies or similar storage for sign-in, session security and preferences. The beta Platform itself does not use advertising cookies. Embedded external content can cause the external provider to receive technical information and set or read its own cookies or identifiers. YouTube training uses the privacy-enhanced youtube-nocookie.com domain, but Google can still receive technical information when the player loads or is used.

9 Retention

- Account and Workspace Content is generally retained while the workspace is active.
- After workspace termination, live Workspace Content is normally deleted or anonymised within 30 days, subject to a return request and legal obligations.
- Residual copies in protected backups age out through the ordinary backup cycle and are not used for ordinary business purposes.
- Routine security logs are kept only as long as reasonably needed, normally no more than 90 days unless an incident requires longer investigation.
- Agreement and acceptance records may be retained for up to five years after the relationship ends where needed to establish or defend legal claims.
- Support correspondence is retained only as long as needed to resolve the request and for reasonable follow-up or legal purposes.

The Workspace Owner may apply different lawful retention periods to the records it controls. Users should remove contact information that is no longer needed.

10 Security

Dupligrow uses measures appropriate to the beta's risks, including HTTPS where correctly configured, authentication, password hashing, role-based and tenant-scoped access, administrative access restrictions, input protection, hosting backups and security maintenance. No online service can guarantee absolute security. Use a strong unique password, protect your device and report suspicious access promptly.

11 Your rights

Subject to GDPR conditions, you may have rights to access, correct, delete or restrict personal data, receive portable data, object to processing based on legitimate interests and withdraw consent where consent is the basis. Withdrawing consent does not affect earlier lawful processing.

For Workspace Content, contact the relevant Workspace Owner first. For Dupligrow-controlled account, security or support information, submit a request through https://dupligrow.com. Dupligrow may need to verify your identity and may involve the Workspace Owner where necessary.

You may complain to the Dutch Data Protection Authority, Autoriteit Persoonsgegevens, at https://autoriteitpersoonsgegevens.nl, or to another competent supervisory authority. Dupligrow encourages you to contact the responsible party first so the issue can be investigated promptly.

12 Automated decisions and children

Dupligrow does not use Workspace Content to make solely automated decisions that produce legal or similarly significant effects. Momentum and activity insights are workflow signals for people to interpret; they are not automated judgments.

The beta is intended for adults acting in a professional or independent-business context. It is not directed to children, and users must not create records about children unless Dupligrow has expressly approved the use case and appropriate safeguards are in place.

13 Changes to this notice

Dupligrow may update this notice as the Platform, operator or legal requirements change. The current version and effective date will be made available through the Platform or dupligrow.com. Material changes will be highlighted or presented again where appropriate.

Dupligrow operator details

Simon Says Coaching, trading as Dupligrow

T.v. Berkhoutstraat 4, 2032 LL Haarlem, the Netherlands

Netherlands Chamber of Commerce number 71191356

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Contact and privacy requests may be submitted through https://dupligrow.com.