

## PRIVACY POLICY

### 1. GENERAL PROVISIONS

- 1.1. This privacy policy serves informational purposes, which means that it does not constitute a source of obligations for Service Recipients or Customers of the onninen.pl Online Store.
- 1.2. The Controller of personal data collected via the Online Store is ONNINEN SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ with their registered office in Teolin (registered address: Teolin 18B, 92-701 Łódź); entered into the Register of Entrepreneurs of the National Court Register under KRS number 0000036846; registry court where the company's documentation is kept: District Court for Łódź-Śródmieście in Łódź, 20th Commercial Division of the National Court Register; share capital in the amount of: PLN 8,322,000.00; NIP (Tax Identification Number): 5261032852; REGON (Polish Business Registry Number): 011177922; BDO (Database on Waste): 000015637; e-mail address: rodo@onninen.com, hereinafter referred to as the "Controller", which is also the Online Store Service Provider and the Seller.
- 1.3. Personal data of Service Recipients and Customers is processed in accordance with 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, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter referred to as "GDPR") and other applicable legal provisions.
- 1.4. The Controller takes special care to protect the interests of data subjects, and in particular ensures that the data collected by them is processed in accordance with the law; collected for specified, lawful purposes and not subjected to further processing incompatible with these purposes; substantively correct and adequate in relation to the purposes for which it is processed and stored in a form enabling identification of data subjects for no longer than is necessary to achieve the purpose of processing.
- 1.5. All words, expressions and acronyms in this privacy policy and beginning with a capital letter (e.g. Seller, Online Store, Electronic Service) should be understood in accordance with their definition contained in the Online Store Terms and Conditions available on the Online Store website.

### 2. PURPOSE AND SCOPE OF DATA COLLECTION AND RECIPIENTS OF THE DATA

- 2.1. Each time, the purpose, scope and recipients of personal data processed by the Controller result from the actions taken by Service Recipients or Customers in the Online Store. For example, if the Customer chooses personal collection instead of a courier shipment when placing an Order, their personal data will be processed for the purpose of concluding and executing the Sales Agreement, but will no longer be made available to the carrier carrying out the shipment on behalf of the Controller.
- 2.2. Personal data of Service Recipients or Customers is collected and processed by the Controller for the following purposes and scopes:
  - 2.2.1. providing access to the Online Store's website and enabling viewing its content (Article 6(1)(f) of the GDPR - the Controller's legitimate interest in providing access to the Online Store) In such a case, personal data is processed to the following extent: IP address;

- 2.2.2. provision of the User Account service within the Online Store and other functionalities available after logging in (Article 6(1)(b) of the GDPR - processing is necessary to execute the agreement to which the Service Recipient/Customer is a party or to take action at their request, before concluding the agreement). In such a case, personal data is processed to the following extent: i) name; ii) surname; iii) e-mail address; iv) telephone number; v) company; vi) tax identification number, vii) name of the employer/customer; viii) IP address; ix) address. The Controller may also process other data voluntarily provided by the Service Recipient/Customer in the Online Store, provided that the Service Recipient consents to it. In such a case, the legal basis for processing is Article 6(1)(a) of the GDPR – consent of the data subject;
- 2.2.3. enabling the submission and execution of an order and the conclusion of a sales agreement for products offered by the Controller via the Online Store (Article 6(1)(b) of the GDPR - processing is necessary to perform the agreement to which the Service Recipient/Customer is a party or to take action on their request before concluding the agreement). In such a case, personal data is processed to the following extent: i) name; ii) surname; iii) e-mail address; iv) telephone number; v) delivery address; vi) address of residence or registered office; vii) data of business activity; viii) details of the employer/customer; ix) payment ID;
- 2.2.4. marketing of the Controller's own products or services, and sending inquiries regarding purchased Products (Article 6(1)(f) of the GDPR - the legitimate interest of the Controller consisting in sending marketing content after obtaining the consents required by law from the Service Recipient/Customer and sending inquiries about satisfaction of the Service Recipient/Customer in connection with a purchase made via the Online Store). In such a case, personal data is processed to the following extent: i) e-mail address;
- 2.2.5. obtaining opinions about Products purchased by the Service Recipient/Customer via the Online Store and publishing them (Article 6(1)(f) of the GDPR - the Controller's legitimate interest in publishing opinions). In such a case, personal data is processed to the extent to which the User/Customer presented them in their opinion;
- 2.2.6. responding to inquiries from the Service Recipient/Customer addressed to the Controller via the contact form or e-mail (Article 6(1)(f) of the GDPR - the Controller's legitimate interest in responding to inquiries addressed to them). In such a case, personal data is processed to the following extent: i) name; ii) surname; iii) e-mail address; iv) other personal data provided by the data subject in messages sent to the Controller;
- 2.2.7. issuing invoices and other accounting documents, as well as storing them (Article 6(1)(c) of the GDPR in connection with the provisions of tax law - processing is necessary to fulfil the legal obligation imposed on the Controller). In such a case, personal data is processed to the following extent: i) name, ii) surname; iii) e-mail address; iv) address; v) tax identification number; vi) company; vii) details of the employer/customer; viii) other personal data required by tax law.
- 2.3. Possible recipients of personal data of Online Store Customers:

- 2.3.1. in the case of a Customer who uses the delivery method by post or courier in the Online Store, the Controller makes the collected personal data of the Customer available to the selected carrier or intermediary carrying out the shipment at the request of the Controller;
  - 2.3.2. The Controller provides personal data of the Service Recipient/Customer in the event of such an obligation arising from legal provisions, at the request of authorized entities.
- 2.4. Providing personal data within the Online Store is voluntary, however, failure to provide it may prevent the use of its functionalities, including the most basic ones such as creating an Account or placing an Order for Products.
- 2.5. Personal data of Service Recipients or Customers may be entrusted for processing to third parties carrying out individual activities for the Controller, such as: i) IT service providers; ii) marketing service providers; iii) customer service providers; iv) service providers enabling obtaining opinions about purchased Products; v) accounting service providers; vi) legal service providers. Before entrusting the processing of personal data to a given entity, the Controller concludes an appropriate entrustment agreement with such an entity, and also verifies the compliance of such entity's operation with the GDPR, as well as the guarantee of ensuring the security and integrity of data by this entity.
- 2.6. Personal data of Service Recipients or Customers will be stored:
  - for the period necessary to perform the agreement, and after that period for the purposes and for the period and to the extent required by law or to secure any claims. The Controller systematically checks the assessment of the usefulness of the data, at least every 3 years from the date of its entry (as long as the basis for its processing is Article 6(1)(b) of the GDPR);
  - until the data subject withdraws their consent, without affecting the legality of processing until the consent is withdrawn or until the data loses its usefulness (if the basis for its processing is Article 6(1)(a) of the GDPR);
  - for the period specified in the law (if the legal basis for its processing is Article 6(1)(c) of the GDPR), in the case of accounting documents, this period is generally 5 years from the end of the year in which a given document was issued;
  - until the data subject submits an objection or until the data loses its usefulness (if the basis for its processing is Article 6(1)(f) of the GDPR).
- 2.7. Personal data of Service Recipients/Customers may be subject to profiling in order to send personalized invitations to conclude a contract or other commercial information to Customers/Service Recipients.
- 2.8. Personal data of Service Recipients/Customers will not be transferred to third countries (outside the European Economic Area).

### 3. COOKIES AND OPERATING DATA

- 3.1. Cookies constitute small text information files, sent by the server and saved on the part of the person visiting the Online Store website in the memory of a given device, via the web browser used

to open the Online Store. Detailed information on cookies, as well as the history of their creation, can be found, among others, at: [https://pl.wikipedia.org/wiki/HTTP\\_cookie](https://pl.wikipedia.org/wiki/HTTP_cookie). The Onninen Online Store uses the following types of cookies:

- 3.1.1 “session” or “temporary” cookies, which are related to the session and are stored on the user’s device until the user leaves the website;
  - 3.1.2. ”persistent” cookies that remain in the browser after the session ends (unless deleted by the user);
  - 3.1.3. third party cookies originating from the servers of entities cooperating with the website.
- 3.2. The Controller may process data contained in Cookies when visitors use the Online Store website for the following purposes:
  - 3.2.1. providing access to the Online Store and its functionalities;
  - 3.2.2. identifying Service Users as logged in to the Online Store and showing that they are logged in;
  - 3.2.3. remembering Products added to the cart in order to place an Order;
  - 3.2.4. remembering data from completed Order Forms, surveys or login details to the Online Store;
  - 3.2.5. adapting the content of the Online Store website to the individual preferences of the Service User (e.g. regarding colours, font size, page layout) and optimizing the use of the Online Store pages;
  - 3.2.6. keeping anonymous statistics showing how the Online Store website is used;
  - 3.2.7. conducting marketing activities.
- 3.3. Consent to the use of cookies is expressed by each person upon first entering the Online Store website (via a given device and browser). Consent is not required for cookies that are necessary to use the functionality of the Online Store. Changing the scope of consents granted is possible using the option available at the beginning of the Privacy Policy.
- 3.4. Each Service User may also, using the functionality of the web browser used, partially limit (e.g. temporarily) or completely disable the ability to save Cookies - in the latter case, however, it may affect some functionalities of the Online Store (for example, it may be impossible to complete the Order path via the Order Form due to not remembering the Products in the cart during subsequent steps of placing an Order).
- 3.5. Internet browser settings regarding Cookies are important from the point of view of consent to the use of Cookies by our Online Store - in accordance with the regulations, such consent may also be expressed through the Internet browser settings. If you do not give such consent, you should change your web browser settings regarding cookies accordingly.
- 3.6. The Controller also processes anonymized operating data related to the use of the Online Store (various types of identifiers related to activities undertaken by the User within the Online Store) to

generate statistics helpful in administering the Online Store. Such data is aggregated and anonymous, i.e. it does not contain features identifying persons visiting the Online Store website. Such data is not disclosed to third parties.

#### **4. THE RIGHT TO CONTROL, ACCESS AND CORRECT YOUR DATA**

- 4.1. Service Recipients or Customers have the right to request access to their personal data, rectify it and object to its processing.
- 4.2. In circumstances specified by generally applicable law, Service Recipients or Customers have the right to request:
  - 4.2.1. deletion of data relating to them, in particular if the personal data being processed is unnecessary to achieve the purpose for which it was collected, the consent based on which it was processed has been withdrawn, an objection to its processing has been raised or the processing is unlawful;
  - 4.2.2. restriction of data processing, in particular if the personal data being processed is incomplete, outdated, untrue or processed in violation of the law or is no longer necessary to achieve the purpose for which it was collected;
  - 4.2.3. transfer their personal data, in particular if data processing takes place on the basis of consent or is undertaken in connection with the performance of an agreement to which the Service Recipient or Customer is a party.
- 4.3. If the processing of personal data of Service Recipients or Customers is based on their consent, they have the right to withdraw this consent at any time without affecting the lawfulness of the processing that was carried out on the basis of consent before its withdrawal.
- 4.4. Service Recipients or Customers also have the right to lodge a complaint with the supervisory authority if they consider that data processing violates the provisions of the GDPR. The complaint should be submitted to the supervisory authority, which until May 25, 2018, is the Inspector General for Personal Data Protection, and after that date, the President of the Personal Data Protection Office.
- 4.5. In order to exercise the rights referred to above, Service Recipients or Customers can contact the Controller by sending an appropriate message in writing or via e-mail to the Controller's address indicated at the beginning of this Privacy Policy.

#### **5. FINAL PROVISIONS**

- 5.1. The Online Store may contain links to other websites. The Controller encourages Service Recipients or Customers to read the privacy policy established there after visiting other websites. This privacy policy applies only to this Online Store.
- 5.2. The Controller applies technical and organizational measures to ensure protection of processed personal data appropriate to the threats and categories of data protected, and in particular protects data against disclosure to unauthorized persons, removal by an unauthorized person, processing in violation of applicable regulations and change, loss, damage or destruction.