

PRIVACY POLICY

1. GENERAL PROVISIONS

- 1.1. This privacy policy is for informational purposes only, meaning it does not impose any obligations on Users or Customers of onninen.pl Online Shop.
- 1.2. The data controller for personal data collected via the Online Shop is ONNINEN SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ (Limited Liability Company), located in Teolin (registered office address: Teolin 18B, 92-701 Łódź); entered in the Register of Entrepreneurs of the National Court Register under NCR number 0000036846; the registry court responsible for the company's records: the District Court for Łódź-Śródmieście in Łódź, XX Commercial Division of the National Court Register; share capital: PLN 8,322,000.00; Tax ID: 5261032852; REGON (National Official Business Register Number) 011177922; BDO (Database on products, packaging and waste management) No.: 000015637; email address: rodo@onninen.com – hereafter the “Controller”, which is also the Online Shop Service Provider and the Seller.
- 1.3. The personal data of the Service User and the Customer are processed in accordance with Regulation (EU) 2016/679 of the European Parliament and 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; hereafter the “GDPR”) and other applicable legal provisions.
- 1.4. The Controller takes particular care to protect the interests of data subjects and ensures that the data collected is processed lawfully; is collected for specified, legitimate purposes and not further processed in a manner incompatible with those purposes; is factually accurate and relevant to the purposes for which it is processed; and is stored in a form that allows for the identification of the data subjects for no longer than necessary to achieve the purpose of processing.
- 1.5. All words, expressions, and acronyms appearing in this privacy policy and beginning with a capital letter (e.g., Seller, Online Shop, Electronic Service) shall be understood in accordance with their definitions set out in the Online Shop Terms and Conditions available on the Online Shop's website.

2. PURPOSE AND SCOPE OF DATA COLLECTION AND DATA RECIPIENTS

- 2.1. In each case, the purpose, scope and recipients of the data processed by the Controller are determined by the actions taken by the Service User or Customer in the Online Shop. For example, if a Customer chooses to collect their order in person rather than by courier when placing an Order, their personal data will be processed for the purpose of concluding and fulfilling the Sales Contract, but shall not be shared with the carrier handling deliveries on behalf of the Controller.
- 2.2. The personal data of Service Users or Customers is collected and processed by the Controller for the following purposes and to the following extent:
 - 2.2.1. to provide access to the Online Shop's website and enable users to browse its content (Article 6(1)(f) of the GDPR – the Controller's legitimate interest in enabling access to the Online Shop). This involves processing your IP address.

- 2.2.2. to register an Account and provide User Account services within the Shop, as well as other functionalities after signing in (Article 6(1)(b) of the GDPR – processing is necessary for the performance of a contract to which the Service Recipient/Customer is a party or to take actions at their request prior to concluding a contract). Personal data processed includes: i) first name; ii) surname; iii) email address; iv) telephone number; v) company name; vi) tax identification number; vii) name of employer/principal; viii) IP address; ix) address. The Controller may also process other data that the Service User/Customer voluntarily provides via the Online Shop, provided they give their consent. In this case, the legal basis for processing is Article 6(1)(a) of the GDPR – the data subject’s consent;
- 2.2.3. to enable the placing and fulfilment of an order and the conclusion of a contract for the sale of products offered by the Controller via the Online Shop (Article 6(1)(b) of the GDPR – processing is necessary for the performance of a contract to which the Service User/Customer is a party or to take actions at their request prior to concluding a contract). Personal data processed includes: i) first name; ii) surname; iii) email address; iv) telephone number; v) delivery address; vi) residential or business address; vii) business details; viii) employer’s or principal’s details; ix) payment identifier;
- 2.2.4. to market the Controller’s products or services and handle enquiries regarding purchased Products (Article 6(1)(f) of the GDPR – the Controller’s legitimate interest in sending marketing content after obtaining the legally required consent from the Service User/Customer to receive marketing materials via electronic means of communication). Personal data processed in such cases include: i) email address; ii) telephone number; iii) the Customer’s ID number and the contact inbox in their account (for “bell” notifications).
- 2.2.5. to collect – based on consent to the sending of requests for feedback - feedback on Products purchased by the Service User/Customer via the Online Shop, or on transactions with the Controller, and the publication of such feedback (Article 6(1)(f) of the GDPR – the Controller’s legitimate interest in promoting the Controller’s activities and ensuring the improvement of the quality of services and the product range). In such cases, personal data is processed to the extent that the User/Customer has provided it in their feedback;
- 2.2.6. to respond to enquiries from the Service User/Customer addressed to the Controller via the contact form or email (Article 6(1)(f) of the GDPR – the Controller’s legitimate interest in responding to enquiries addressed to it). Personal data processed includes: (i) first name; (ii) surname; (iii) email address; (iv) other personal data provided by the data subject in messages sent to the Controller;
- 2.2.7. to issue invoices and other accounting documents, as well as their storage (Article 6(1)(c) of the GDPR in conjunction with tax law provisions – processing is necessary for compliance with a legal obligation to which the controller is subject). Personal data processed includes: i) first name; ii) surname; iii) email address; iv) postal address; v) tax identification number; vi) company name; vii) employer’s/principal’s details; viii) other personal data required by tax legislation.
- 2.2.8. to detect and prevent fraud, and diagnose errors (Article 6(1)(f) of the GDPR – the Controller’s legitimate interest in ensuring the security of the Online Shop).

- 2.2.9. to pursue or defend against claims (Article 6(1)(f) of the GDPR – the Controller’s legitimate interests).
- 2.3. Potential recipients of the personal data of the Online Shop’s customers:
 - 2.3.1. if a Customer opts for postal or courier delivery, the Controller may share their personal data with the relevant delivery service provider or delivery processing agent.
 - 2.3.2. The Administrator is required to disclose the personal data of Service Users/Customers when mandated by law or upon request from authorised entities;
 - 2.3.3. if a Customer wishes to register an Account that links to another Service User’s Account, the Controller may share the personal data provided by the new Customer during registration with the existing Service User. This allows the Service User to decide whether to accept or decline the linking of the new Customer’s Account to theirs.
- 2.4. Providing personal data via the Online Shop is voluntary; however, not supplying this data may hinder the ability to utilise basic functionalities, such as creating an Account or placing Orders for Products.
- 2.5. The personal data of Service Users or Customers may be entrusted to third parties for processing specific tasks on behalf of the Controller, including: i) IT service providers; ii) marketing service providers; iii) customer service providers; iv) accounting service providers; and v) legal service providers. Before sharing personal data with any party for processing, the Controller ensures that a suitable data processing agreement is in place and verifies that the entity adheres to GDPR standards while guaranteeing the security and integrity of the data.
- 2.6. The personal data of Service Users or Customers will be retained for:
 - the duration necessary to fulfil the contract, and subsequently, for as long as required by law or to protect against potential claims. The Controller reviews the relevance of the data systematically at least every three years from the date of entry (where the basis for processing is Article 6(1)(b) of the GDPR);
 - until the data subject withdraws their consent, without impacting the legality of processing that occurred before such withdrawal, or until the data is deemed irrelevant (where processing is based on Article 6(1)(a) of the GDPR);
 - the legally mandated period (where processing is based on Article 6(1)(c) of the GDPR); for accounting documents specifically, this is generally five years from the end of the year in which the document was issued;
 - until the data subject raises an objection or the data is no longer relevant (where the basis for processing is Article 6(1)(f) of the GDPR); in cases of pursuing or defending claims, the data will be retained until the claims become time-barred. For security purposes related to the Online Shop, data will be retained for 6 months from the date of incident detection (for example, when an Account registration is rejected, this period is counted from the date of rejection).
- 2.7. The personal data of Service Users/Customers may be profiled to send personalised invitations for contract opportunities or other commercial information. Additionally, the Controller may

monitor the activities of Service Users/Customers in the Online Shop to enhance its security and protect against attacks or uncontrolled traffic. This data will not be shared with third parties, except with authorised authorities, such as the public prosecutor's office or law enforcement.

- 2.8. The personal data of Service Users/Customers will not be transferred to third countries (outside the European Economic Area).

3. COOKIES AND USAGE DATA

- 3.1. Cookies are small text files sent by the server and stored on the devices of individuals visiting the Online Shop. They are transmitted via the web browser used to access the Online Shop. For detailed information about cookies and their historical development, you can refer to sources like this: https://pl.wikipedia.org/wiki/HTTP_cookie. The Onninen Online Shop utilises the following types of cookies:
 - 3.1.1 “session” or “temporary” cookies, which are linked to an active session and remain on a user's device until they exit the website;
 - 3.1.2. “persistent” cookies, which remain in the browser even after a session has ended (unless deleted by the user);
 - 3.1.3. third-party cookies, originating from the servers of organisations that collaborate with the website.
- 3.2. The Controller may process the information contained in cookies while visitors navigate the Online Shop for the following purposes:
 - 3.2.1. to ensure that users can access the Online Shop and utilise its functionalities;
 - 3.2.2. to identify Service Users who are logged in and indicate their logged-in status on the Online Shop;
 - 3.2.3. to remember Products added to the shopping cart while placing an Order;
 - 3.2.4. to store data entered in Order Forms, surveys, or login details for the Online Shop;
 - 3.2.5. to customise the content of the Online Shop's website according to the individual preferences of Service Users (such as colour schemes, font sizes, page layouts) and to enhance the user experience on the Online Shop;
 - 3.2.6. to compile anonymous statistics that show how the Online Shop is being used;
 - 3.2.7. to conduct marketing activities.
- 3.3 Users provide consent for the use of cookies during their initial visit to the Online Shop (via a specific device and browser). Consent is not necessary for cookies that are essential for the Online Shop to function properly. Users can modify the extent of their consent using the options available at the start of the Privacy Policy.
- 3.4. Each User can adjust their web browser settings to partially restrict (for instance, temporarily) or completely block cookie storage. However, turning off cookies entirely may hinder specific

features of the Online Shop (such as the inability to complete the Order process, as the items in the cart would not be saved for subsequent steps in placing the Order).

- 3.5. The cookie settings in your web browser play a crucial role in your consent to the use of cookies on our Online Shop. According to regulations, such consent can also be granted through your web browser settings. If you prefer not to give consent, you should adjust your browser's cookie settings accordingly.
- 3.6. The Controller also processes anonymised usage data related to interactions within the Online Shop. This includes various identifiers connected to a User's activity, which are used to generate statistics that aid in the administration of the Online Shop. This data is aggregated and anonymous, meaning it does not contain any identifiable information about visitors to the Online Shop's website. This data is not shared with third parties.

4. THE RIGHT TO INSPECT, ACCESS AND CORRECT YOUR DATA

- 4.1 Service Users and Customers have the right to request access to their personal data, to have it rectified, and to object to its processing.
- 4.2 Under certain circumstances defined by applicable law, Service Users and Customers can request the following:
 - 4.2.1. the deletion of their data, particularly when the personal data being processed is no longer relevant for the purpose for which it was collected, when consent has been withdrawn, when an objection has been made against its processing, or when the processing is deemed unlawful;
 - 4.2.2. the limitation of data processing, especially when the personal data being processed is incomplete, outdated, inaccurate, or if it is being processed in violation of the law, or when it is no longer relevant for the initial purpose of collection;
 - 4.2.3. the transfer of their personal data, particularly when processing is carried out by automated means with consent or is connected to the execution of a contract involving the Service User or Customer.
- 4.3 If the processing of a Service User's or Customer's personal data is based on their consent, they have the right to withdraw that consent at any time, without affecting the legality of the processing that occurred before the withdrawal.
- 4.4 Service Users and Customers also have the right to file a complaint with a supervisory authority if they believe that the processing of their data violates GDPR provisions. Complaints should be directed to the supervisory authority that, until 25 May 2018, was the Inspector General for Personal Data Protection, and thereafter, the President of the Personal Data Protection Office.
- 4.5 To exercise the rights mentioned above, you can contact the Controller by sending a written message or an email to the Controller's address provided at the beginning of this Privacy Policy.

5. FINAL PROVISIONS

- 5.1. The Online Shop may include links to other websites. The Controller encourages you to review the privacy policies of those sites when you visit them. This privacy policy applies only to this Online Shop.
- 5.2 The Controller has implemented technical and organisational measures to protect the personal data being processed, in line with the associated risks and data categories requiring protection. Specifically, the Controller safeguards the data against unauthorised access, unauthorised removal, unlawful processing, and against alteration, loss, damage, or destruction.