### PRIVACY POLICY AND PERSONAL DATA PROTECTION

On the basis of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (general regulation on data protection), hereinafter referred to as the GDPR, established:

This Privacy Policy sets out the rules for the collection, processing and use of personal data obtained from you by the LadneFelgi.pl online store, run at ladnefelgi.pl (hereinafter referred to as the Website) by LadneFelgi.pl Ewelina Taraszkiewicz Spółka Komandytowa with its registered office in Suwałki, on ul. Władysława Łokietek 86E, (hereinafter referred to as the Online Store).

The online store makes every effort to ensure respect for your privacy and protection of personal information provided when using the Website and making purchases within the store and for this purpose takes all necessary actions.

# WHAT DATA DOES THE ONLINE STORE COLLECT AUTOMATICALLY WHEN USING THE WEBSITE?

The online store does not automatically collect any data, except for the data contained in cookies when using the Website.

Cookies are small text files sent by an online store and stored on your computer containing certain information related to your use of the Website and Online Store. Cookies used by the online store may be temporary or permanent. Temporary cookies are deleted when you close your browser, while permanent cookies are also stored after you finish using the Website

and are used to store information such as your password or login, which speeds up and facilitates the use of the Website.

In any case, you can block the installation of cookies or delete permanent cookies using the appropriate options of your web browser. In case of problems, we advise you to use the browser's help file or contact the browser manufacturer you are using.

In addition to cookies, the online store may also collect data usually collected by internet system administrators as part of so-called logs or log files. Information contained in logs may include, among others Your IP address, type of platform and web browser, Internet provider and the address of the page from which you entered the Website. Some subpages of the Website and other means of communication with you may contain so-called "Web beacons" (so-called electronic pictures). Web beacons allow you to receive information such as the IP address of the computer on which the page on which the web beacon was posted, the page URL, time of page loading, type of browser, as well as information contained in cookies in order to assess the effectiveness of our ads. These data will be archived and used for statistical analysis and assessment of the global traffic of Website users. These data will not be combined with personal data provided by you.

# WHAT DATA DOES THE ONLINE STORE COLLECT WHEN REGISTERING AND MAKING PURCHASES?

The processing of personal data provided by the LadneFelgi.pl Customer (hereinafter: "Customer") during the Activation of the Service is based on art. 6 clause 1 lit. b GDPR for the purpose of providing services by LadneFelgi.pl and issuing accounting documents, as well as on the basis of consent expressed pursuant to art. 6 clause 1 lit. a GDPR for the processing of customer personal data for marketing purposes.

The online store will collect the following personal data from you via the

Website and other forms of communication when making purchases and registering on the Website:

- 1) surname and name,
- 2) permanent residence address,
- 3) mailing address, if different from the registered address,
- 4) e-mail address,
- 5) number phone.

Providing the above data is voluntary but necessary for registration and purchase on the Website.

### THE ADMINISTRATOR OF YOUR PERSONAL DATA IS:

LadneFelgi.pl Ewelina Taraszkiewicz Spółka Komandytowa ul. Władysława Łokietka 86E 16 – 400 Suwałki

The Administrator will not use the Buyer's personal data for purposes other than those indicated in the Regulations. If these data are to be used in a different way than the Order, it must result from the provisions of the Regulations.

The Buyer's personal data processed by the Administrator is based on the Administrator's legitimate interest, pursuant to art. 6 clause 1 lit. f) GDPR, for the purpose of: marketing of own products or services, pursuing or securing claims, and pursuant to art. 6 clause 1 lit. a) and f) GDPR, in order to:

- 1. Raising the standard of service and better matching the offer, with the Administrator being able to use recommending systems whose idea is that they profile the customer in the context of his shopping preferences. The Administrator does not make a decision towards the Buyer based on the profiling of automated decisions referred to in art. 22 paragraph 1 and 4 GDPR.
- 2. Establishment, investigation and execution of claims,

- 3. Answers to Buyer's questions and requests,
- 4. Creating analyzes and summaries for the internal needs of the Administrator.

The Administrator will store the Buyer's personal data until the expiry of the limitation period for claims arising from the concluded contract or for the period required by separate provisions on tax and accounting obligations, and depending on which period will end later. After this date, the Buyer's personal data will be processed by the Administrator pursuant to art. 6 clause 1 lit. f) GDPR, i.e. for purposes arising from legitimate interests pursued by the Administrator for the purposes of advertising campaigns.

If the processing of personal data by the Operator is based on the consent given by the Customer, referred to in art. 6 clause 1 lit. a) GDPR, the Customer has the right to withdraw consent at any time without affecting the lawfulness of the processing that was carried out on the basis of consent before its withdrawal.

You have the right to access your personal data and the right to amend it. In order to exercise this right, please use the options under your account or from the e-mail address: biuro@ladnefelgi.pl, tel.: 87 737 19 00.

#### ONLINE STORE MARKETING

If you have agreed to this (subscription to the newsletter), the e-mail address provided by you will be used for marketing purposes of your own LadneFelgi.pl products. Consent may be withdrawn at any time by sending an e-mail to the address biuro@ladnefelgi.pl or by entering your address in the newsletter subscription field in the footer of the page.

#### PROVIDING INFORMATION

In order to perform the contract, the online store may share the data collected from you to the following entities:

IAI S.A. with headquarters in Szczecin, Aleja Piastów 30, 71-064 Szczecin, as the operator of IdoSell Shop for comprehensive order processing, issuing accounting documents;

UPS Polska Sp. z o.o. to process the shipment;

InPost Sp. z o.o. to process the shipment;

General Logistics Systems B.V. (GLS) to process the shipment;

Google Ing. 1600 Amphitheater Parkway Mountain View, CA 94043, by connecting store accounts to Google Analytics for statistical analysis of traffic and diagnostics;

Google Ing. 1600 Amphitheater Parkway Mountain View, CA 94043, by promoting our website in search results and on third-party websites; Dotpay Sp. z o.o., with its registered office in Krakow, 30-552 Kraków, at 72 Wielicka Street to accept payments;

PayPal (Europe) S.à r.l. et Cie, S.C.A. to accept payments;

Santander Consumer Bank S.A. if you want to use credit installments;

Credit Agricole Bank Polska S.A. if you want to use credit installments;

BNP Paripas if you want to use credit installments;

Accounting Office ABACUS Bogdan Cichocki ul. Patli 13, 16-400 Suwałki.

In such cases, the amount of data transferred is limited to the required minimum.

In addition, the information you provide may be disclosed to competent public authorities if required by applicable law.

#### INTEGRATION OF TRUSTED SHOPS TRUSTBADGE

On our website there is an integrated Trusted Shops Trustbadge, which is used to display our Trusted Shops quality mark and collected opinions about purchases in our store, as well as to present the offer of Trusted Shops

products available to buyers after placing an order in our store.

The above serves to protect our prevailing legitimate interest, consisting in the optimal functioning of our offer on the market. The Trustbadge and services advertised through it are the offer of Trusted Shops GmbH, Subbelrather Str. 15C, 50823 Cologne.

When you call Trustbadge, the server automatically remembers the so-called server logs, containing e.g. your IP address, date and time of the call, the amount of data transmitted and the requesting service provider (access data) and documents the call. Ww. access data is not subject to analysis and is automatically overwritten within seven days of closing the page.

Other personal data is only transferred to Trusted Shops if, after completing your order, you voluntarily decide to use Trusted Shops products or have already registered to use them. In such cases, the agreement concluded between you and Trusted Shops applies.

# INTEGRATION WITH TRAFFICWATCHDOG

The service uses the TrafficWatchdog system - during the User's use of the Service, data regarding the User and visits are automatically collected and processed. These data include: IP address (Internet Protocol), basic information about the computer device used to access the Service, an identifier - which is assigned to the device from which visits are generated, end device parameters, operating system parameters, browser parameters, general geographical location of the visit, User's interaction with the Service and activity data in the Service, time spent in the Service, HTTP header parameters, marketing campaign parameters. These data may be collected by cookies, Google Analytics system, and Google re-Captcha system. These data are collected and processed to identify marketing abuses such as ad fraud.

## **USE OF SOCIAL PLUGINS**

Our website uses so-called social plugins ("plugins") of social networking sites.

By displaying our website containing such a plugin, your browser will establish a direct connection to Facebook, Google, Twitter or Instagram servers.

The purpose and scope of data collection and their further processing and use by service providers, as well as the possibility of contact and your rights in this regard and the possibility of making settings that ensure the protection of your privacy are described in the privacy policy of service providers:

http://www.facebook.com/policy.php

https://twitter.com/privacy

http://www.google.com/intl/de/+/policy/+1button.html

https://about.pinterest.com/de/privacy-policy

If you do not want social networks to assign data collected during visits to our website directly to your profile on a given website, then before visiting our website you must log out of this website. You can also completely prevent the plugins from loading on the page by using the appropriate extensions for your browser, e.g. blocking scripts using "NoScript" (http://noscript.net/)."

# TECHNICAL MEASURES AND YOUR OBLIGATIONS

The online store makes every possible effort to secure your data and protect it against the actions of third parties. We use all necessary security for servers, connections and the Website to protect your data. All connections related to your electronic payments, if you choose this option, will be via a secure encrypted connection.

However, our actions may not be sufficient if you do not follow the safety

rules yourself. In particular, you must keep the login and password for the Website confidential and not disclose them to third parties. Please remember that the online store will not ask you for them, except when you log in to the Website. In order to prevent unauthorized persons from using your account, please log out after using the Website.

### **HOW CAN YOU EXERCISE YOUR RIGHTS?**

You have the option of viewing and editing your data, at any time, as part of the Website, after logging in using your email address and password. If you forget your password or other problems logging in, please contact us at: biuro@ladnefelgi.pl.

You have the right to request information about the content of data stored about you, as well as the right to request that data be changed, blocked or deleted, as well as the right to rectify errors, supplement or update your data. You also have the opportunity to object to the processing of your personal data for marketing purposes. For this purpose, please contact us at: biuro@ladnefelgi.pl.

#### **OTHER WEBSITES**

As part of the Website, links to other websites may appear from time to time. Such websites operate independently of the Website and are not supervised by the online store in any way. These websites may have their own privacy policies, which we recommend to read. The online store is not responsible for the rules of handling data on these pages.

# **QUESTIONS AND STIPULATION**

Questions and reservations regarding this Privacy Policy may be asked by you at: biuro@ladnefelgi.pl.

# **FINAL PROVISIONS**

- 1. In matters not covered by these Regulations, the provisions of the Civil Code and relevant acts of Polish law as well as European Union law, in particular the GDPR, shall apply..
- 2. The Regulations do not limit any rights of the buyer who is a consumer that he is entitled due to the applicable legal regulations. In the event of a conflict between the Regulations and applicable law, granting rights to Consumers, the applicable law shall prevail.
- 3. Regulations, Privacy Policy and Personal Data Protection are available to all Buyers in an electronic version on the Store's website.