

PRIVACY POLICY OF PFLEIDERER POLSKA ("Privacy Policy")

To ensure the security of personal data of our customers and contractors, in accordance with Article 13 and 14 (1) and (2) of 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) (OJ EU of 2016. No. 119, item 1, as amended) hereinafter also referred to as "**GDPR**", we hereby provide you with information and rules regarding the processing of your personal data by Pfleiderer Polska Spółka z ograniczoną odpowiedzialnością, with its registered office in Wrocław.

§ 1 [PERSONAL DATA CONTROLLER]

1. The Controller of Personal Data of our customers, contractors and partners is **Pfleiderer Polska Spółka z ograniczoną odpowiedzialnością with its registered office in Wrocław**, ul. Strzegomska 42AB, 53-611 Wrocław, entered into the Register of Entrepreneurs of the National Court Register by the District Court for Wrocław-Fabryczna in Wrocław, 6th Commercial Division of the National Court Register under KRS No.: 0000247423, share capital: PLN 1,563,499,000.00, fully paid-up; NIP (Tax Identification Number): 719-150-39-73, REGON (National Business Registry Number): 200052769, hereinafter referred to as "**Controller**" or equivalently as "**Pfleiderer Polska**".
2. For matters related to the processing of personal data (hereinafter referred to as: "**PD**") please contact us at: Pfleiderer Polska Sp. z o.o., ul. Strzegomska 42 AB, 53-611 Wrocław or by e-mail: rodo@pfleiderer.com.
3. The Controller shall process personal data of natural persons (consumers), data concerning natural persons conducting business or professional activity on their own behalf and natural persons representing legal persons or organisational units other than legal persons, which are granted legal capacity by the law, conducting business or professional activity on their own behalf, hereinafter referred to as: "**Customers**" or equivalently "**Users**".

§ 2 [RULES OF PERSONAL DATA PROCESSING]

1. The Controller shall observe the following personal data protection principles when processing personal data:
 - a) **The principle of lawfulness, fairness and transparency of data processing**, according to which the data shall be processed by the Controller in a lawful, fair and transparent manner for the data subject.
 - b) **The principle of limiting the purpose of data processing** - data shall be collected by the Controller in a manner consistent with the purposes of their processing.
 - c) **The principle of data minimisation** - the Controller shall process the amount of data that is adequate, relevant and limited to what is necessary in relation to the purposes for which data are processed.
 - d) **The principle of the accuracy of data processed** - the Controller shall process only the data that are accurate and where necessary kept up to date. The controller shall take every reasonable step to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
 - e) **The principle of limiting the duration of processing and the purposes for which data may be stored** - the Controller shall store personal data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. The Controller may store personal data for a longer period, insofar as the personal data will be processed for statistical purposes. At the same time, the Controller shall implement appropriate technical and organisational measures to protect the

rights and freedoms of data subjects.

- f) **The principle of ensuring integrity and confidentiality of data processing** - the Controller shall process data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- g) **The principle of accountability** - the Controller shall be responsible for, and be able to demonstrate compliance with, all principles of personal data processing listed in letters a) - f) above.
2. The Controller shall implement appropriate technical and organisational measures which ensure the highest level of security of personal data processed by the Controller, in accordance with the principles listed above.

§ 3 [PURPOSE OF PD PROCESSING. LEGAL BASIS FOR PD PROCESSING. PD STORAGE AND PROCESSING PERIOD]

Purposes of PD processing	Legal basis for PD processing	PD storage period
Creation and registration of an individual account by the customer for the purpose of completing on-line sales	<p>Article 6(1)(a) of the GDPR - consent of the data subject (customer) expressed by a voluntary creation of a customer account</p> <p>Article 6(1)(b) of the GDPR - necessity for conclusion and performance of the contract</p>	<p>Until lodging of a declaration of withdrawal of consent to the personal data processing.</p> <p>For the duration of the contract and upon its termination until the expiration of the limitation period for claims arising thereunder, as a rule 3 years, maximum 6 years. The limitation period stems from the provisions of the Civil Code.</p>
Conclusion and performance of sales and delivery contracts with customers / contractors of Pfeiderer Polska (in the case of natural persons)	<p>Article 6(1)(b) of the GDPR - sales or delivery contract concluded between the customer and Pfeiderer Polska</p> <p>Article 6(1)(c) of the GDPR - provisions of the Act of Civil Code</p>	<p>For the duration of the contract and upon its termination until the expiration of the limitation period for claims arising thereunder, as a rule 3 years, maximum 6 years. The limitation period is set forth in the provisions of the Civil Code.</p> <p>If the periods for the exercise of potential claims are shorter than the storage periods of tax settlement documents, we shall store such documents for the time necessary for tax settlement purposes, i.e. for 5 years from the end of the year in which the tax obligation has arisen.</p>
Processing of data of partners or employees of customers or contractors of Pfeiderer Polska for the purpose of proper execution of sales and delivery contracts (in the case of	Article 6 (1)(f) of the GDPR - legitimate interest of the Controller, the purpose of which is the proper contract performance and contact	For the duration of the contract and upon its termination until the expiration of the limitation period for claims arising thereunder, as a rule 3 years, maximum 6 years. The limitation period is set forth in the

contractors who are legal persons or enterprises)	with the contractor	provisions of the Civil Code.
Handling complaints reported by the customers (under warranty and guarantee)	Article 6(1)(b) of the GDPR - sales or delivery contract concluded between the customer and Pfeiderer Polska Article 6(1)(c) of the GDPR - in connection with applicable laws, including the provisions of the Civil Code	Records related to the handling of a specific customer complaint shall be stored for one more year after the warranty expires or the complaint is settled. The time limits for handling claims under warranty or guarantee are set forth in the Act of the Civil Code.
Carrying out marketing activities towards prospects and current customers (without the use of means of electronic communications)	Article 6 (1)(f) of the GDPR - the legitimate interest of the Controller is expressed in its intention to conduct advertising campaigns for customers	Until the customer lodges an objection to the processing of their data for marketing purposes
Carrying out marketing activities towards prospects and current customers (with the use of means of electronic communications)	Article 6 (1)(a) of the GDPR, i.e. the consent of data subjects The legal basis for the processing is the consent of the data subjects due to the content of the Telecommunications Law and the Act on Providing Services by Electronic Means	Until withdrawal of consent, or informing by any means of the intention to discontinue contact and receive information about activities undertaken by the Personal Data Controller by electronic mail (e-mail) or telephone.
Exercise of claims by the Controller or defence against legal claims issued towards the Controller	Article 6(1)(f) of the GDPR - based on the legitimate interest of the data Controller in order to secure and defend against claims	For the duration of proceedings concerning the exercised claims, until their legally binding conclusion, and in the case of enforcement proceedings, until final settlement of the exercised claims.
Storage of documents containing personal data (agreements/contracts, invoices) for settlement purposes	Article 6(1)(c) of the GDPR - in accordance with applicable tax laws	We shall store such documents for the time necessary for tax settlement purposes, i.e. for 5 years from the end of the year in which the tax obligation has arisen.
Subscription for Pfeiderer Polska newsletter (performance of the contract for the provision of a service by electronic means)	Article 6 (1)(a) of the GDPR - consent of the data subject, voluntarily declared by ticking a relevant box on Pfeiderer Polska's website	Personal data processed in connection with the subscription for Pfeiderer Polska newsletter until the consent is withdrawn, in the same way as it was granted.
Provision of personal data by customers using the contact form on Pfeiderer Polska's store website for the purpose of executing the contract	Article 6(1)(a) of the GDPR - consent of the data subject expressed by a voluntary provision of data in a contact form	Until the consent is withdrawn, in the same way as it was granted

performed by electronic means	Article 6(1)(b) of the GDPR - sales or delivery contract concluded between the customer and Pfeiderer Polska	For the duration of the contract and upon its termination until the expiration of the limitation period for claims arising thereunder, as a rule 3 years, maximum 6 years. The limitation period is set forth in the provisions of the Civil Code.
Establishment of cooperation on the basis of civil law contracts and activities and settlements related to the cooperation	Article 6(1)(c) of the GDPR - pursuant to applicable legal regulations, including the Civil Code and tax law acts Article 6 (1) (b) of the GDPR - applicable civil law contract between Pfeiderer Polska and the contractor	For the duration of the contract and upon its termination until the expiration of the limitation period for claims arising thereunder, as a rule 3 years, maximum 6 years. If the periods for the exercise of potential claims are shorter than the storage periods of tax settlement documents, we shall store such documents for the time necessary for tax settlement purposes, i.e. for 5 years from the end of the year in which the tax obligation has arisen.

§ 4 [TYPE AND CATEGORIES OF PERSONAL DATA PROCESSED]

1. The Controller shall process the following personal data of the Users of Pfeiderer Polska On-line Store:
 - a) When creating their Customer Account in the Store, the Users shall provide the following personal data:
 - name and surname,
 - e-mail address,
 - address data, including town/city and postal code, street, building number and apartment number,
 - telephone number,
 - NIP number (in the case of enterprises and legal persons).

The password to access the Customer Account at the e-store website shall be set up by the user on their own. The User may change their password at any time.
 - b) While placing an Order in the Store, the User shall provide the following personal data:
 - name and surname,
 - e-mail address,
 - address data, including town/city and postal code, street, building number and apartment number,
 - telephone number,
 - NIP number (in the case of enterprises and legal persons),
 - company (in the case of enterprises and legal persons).
 - c) While subscribing to the Controller's Product Newsletter, the User shall provide the following personal data:
 - User's e-mail address,
 - d) when providing data using the contact form, the User shall provide the following personal data:
 - name and surname,
 - e-mail address,
 - telephone number,
 - address data (optional).
2. In connection with the use of Pfeiderer Polska's we service and on-line store, the Controller may

process the following information, i.e. IP address of the User's computer or Internet provider, browser type, access time, navigation data, location data, browser type, operating system type, payment transaction record, website visit history, behavioural data of the website user.

§ 5 [SOURCE OF PERSONAL DATA]

The personal data processed are obtained by the Controller:

1. directly from Customers,
2. from publicly available sources, such as:
 - a) Central Register and Information on Economic Activity (CEIDG),
 - b) Central Information of the National Court Register (KRS),
 - c) the Internet.

§ 6 [PERSONAL DATA RECIPIENTS]

1. Your personal data recipients shall be:
 - a) state authorities or other entities authorised under the law,
 - b) entities supporting the Controller in its activity on its behalf, in particular: providers of external data communications systems supporting the activity and running an on-line store, carriers and postal operators, including Poczta Polska S.A., couriers making deliveries on behalf of the Controller, on-line sales platforms,
 - c) domain, hosting and e-mail providers,
 - d) banks when settlements are required,
 - e) in the case of conducting court proceedings, exercising claims - law firms or debt collection companies.
2. The processing of personal data may only be entrusted to entities that provide sufficient guarantees to implement appropriate technical and organisational measures so that the processing meets the requirements of the GDPR and safeguards the rights of the data subjects.
3. The Controller shall apply implemented principles for the selection and verification of data processors at the commission of Pfeiderer Polska, designed to ensure that processors guarantee the implementation of appropriate organisational and technical measures to ensure security, the exercise of the rights of the individuals and other data protection obligations.

§ 7 [EXERCISING RIGHTS OF DATA SUBJECTS]

1. Pfeiderer Polska exercises the rights of data subjects by introducing procedural guarantees to protect the rights and freedoms of data subjects. Pursuant to Articles 12 - 23 of the GDPR, you have the right to:
 - a) access your data and obtain a copy thereof;
 - b) rectify (correct) your personal data, if they are inaccurate,
 - c) restrict the processing of personal data,
 - d) erase personal data,
 - e) lodge a complaint with the President of the Personal Data Protection Office (address: ul. Stawki 2, 00193 Warsaw), if you find that the processing of your personal data constitutes a breach the provisions of the GDPR,
 - f) withdraw consent to the processing of personal data, if data processing was based on your consent,
 - g) object to the processing of your personal data should the cases specified in Articles 21-22 of the GDPR occur.
2. **[Right of Access to PD]** Pursuant to Article 15 of GDPR, the User has the right to obtain confirmation from the Controller whether it processes personal data and, if this is the case, the User has the right to:
 - a) access their personal data,

- b) obtain information about the purposes of processing, categories of personal data processed, about recipients or categories of recipients of such data, the envisaged period for which the User's personal data shall be stored or about the criteria used to determine that period (where it is not possible to determine the envisaged period of data processing), about the rights of the User under GDPR, and about the right to lodge a complaint with the supervisory authority, about the source of such data, about the existence of automated decision-making, including profiling, and about the safeguards applied in connection with the transfer of such data outside the European Union;
 - c) obtain a copy of their personal data.
3. **[Right to obtain a copy of PD]** At the User's request, the Controller shall provide the data subject with a copy of the data concerning them and note the fact that the first copy of the data has been issued. The Controller shall introduce and maintain a price list of data copies according to which it shall charge fees for subsequent data copies. The price of data copies shall be calculated on the basis of the estimated unit cost of handling the request for issuing the data copies.
4. **[Right to rectify inaccurate DO]** At the request of the data subject, the Controller shall rectify inaccurate data. The Controller has the right to refuse to rectify the data, unless the data subject reasonably proves the inaccuracy of the data which the data subject requests to be rectified.
5. **[Right to erase PD]** At the request of the data subject, the Controller shall erase the PD in the following cases:
- a) the data are no longer necessary in relation to the purposes for which they were collected or processed for other purposes,
 - b) the data subject has withdrawn their consent to the processing thereof, and the Controller has no other legal basis for the processing of such data,
 - c) the data subject has raised an effective objection to the processing of data in question,
 - d) personal data have been processed unlawfully,
 - e) the necessity to erase the data results from a legal obligation,
 - f) the request concerns the data of a child collected based on consent in order to offer information society services directly to a child.
6. The Controller shall execute the requests to erase the data in such a way as to ensure the effective exercise of this right while respecting all the principles of data protection, including security, as well as shall have in a place a proven method of verification that the exceptions referred to in Article 17(3) of the GDPR do not apply.
7. Where the data to be erased has been made public by the Controller, the Controller shall take reasonable steps, including technical measures, to inform other controllers and processors of such personal data about the need to erase the data and access to data.
8. The Controller shall refuse to exercise the right to erase personal data to the extent that processing is necessary:
- a) for exercising the right of freedom of expression and information;
 - b) for compliance with a legal obligation which requires processing by Union or Member State law to which the Controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller;
 - c) for the establishment, exercise or defence of legal claims.
9. **[Right to restrict the PD processing]** At the request of the data subject, the Controller shall restrict data processing in the following cases:
- a) the accuracy of the personal data is contested by the data subject, for a period enabling the Controller to verify the accuracy of the personal data;
 - b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - c) the Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
 - d) the data subject has objected to processing, on grounds relating to their particular situation,

pending the verification whether there are legitimate grounds for objection on the part of the Controller.

10. During the restriction of processing, the Controller shall store the data, but shall not process them (shall not use, shall not transfer) without the consent of the data subject, unless for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.
11. The Controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 of the GDPR to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Controller shall inform the data subject about those recipients if the data subject requests it.
12. **[Right to PD portability]** At the request of a data subject, the Controller shall provide, in a structured, commonly used machine-readable format or transfer to another entity, if possible, data concerning the data subject who provided the Controller with data processed on the basis of the consent of that data subject or for the purpose of concluding or executing a contract concluded with the Controller in the Controller's IT systems.
13. **[Right to object to data processing]** The User shall have the right to object at any time - for reasons related to their particular situation - to the processing of their personal data, including profiling, if the Controller processes their data on the basis of a legitimate interest, e.g. marketing of products and services, e-mailing of commercial information, including a newsletter, keeping statistics on the use of individual functionalities of the on-line store.
14. Opting out by e-mail of receiving marketing communications about products or services shall be deemed as the User's objection to the processing of their personal data, including profiling for such purposes.
15. Should the User's objection prove to be justified and the Controller has no other legal basis for processing the personal data, personal data objected by the User shall be erased and shall not be processed for this purpose.
16. Should the User exercise the rights listed in this paragraph, Pfeiderer Polska shall meet the request or refuse to fulfil it immediately, but not later than within one month after its receipt. However, if - due to the complicated nature of the request or the number of requests - Pfeiderer Polska is unable to meet the requests within one month, it shall meet them within the next two months, informing the User beforehand within one month from the receipt of the request - about the intended extension of the deadline and the reasons thereof.
17. **[Right to Complaint to the supervisory authority]** The User shall have the right to lodge a complaint with the President of the Personal Data Protection Office (address: ul. Stawki 2, 00-193 Warsaw), if in their opinion the Controller violates their personal data protection rights or other rights granted under GDPR.

§ 8 [THE RIGHT TO WITHDRAW THE CONSENT TO THE PROCESSING OF PERSONAL DATA IN CONNECTION WITH DIRECT MARKETING AND PROFILING]

1. In relation to your personal data processed on the basis of consent, you shall have the right to withdraw consent at any time without affecting the lawfulness of the processing carried out on the basis of your consent before its withdrawal (including, in particular, for the purposes of direct marketing, sending newsletters, presentation of commercial information and profiling).
2. You shall have the right to withdraw your consent at any time, but withdrawal of consent shall take effect as of the moment of withdrawal.
3. Withdrawal of consent shall be made by submitting a consent withdrawal declaration, sent to the Controller's address in the form of a letter or an e-mail, as specified in § 1 of this Privacy Policy of Pfeiderer Polska. Consent may also be withdrawn by unchecking the relevant checkboxes on Pfeiderer's website.
4. Withdrawal of consent shall not affect the legal processing performed by the Controller prior to

- the submission of the consent withdrawal declaration.
5. Submission of the consent withdrawal declaration shall not entail any negative legal consequences for the Users, however, it may prevent further use of some of the services or functionalities which, according to the law, the Controller may provide only upon consent.

§ 9 [INFORMATION ON THE OBLIGATION TO PROVIDE DATA]

1. Provision of data is necessary for the conclusion of contracts and their settlement and for the fulfilment of legal requirements by the Controller and applies to the following situations:
 - a) conclusion and execution of contracts with customers/contractors,
 - b) handling complaints reported by the customers (under warranty and guarantee) and plaints,
 - c) exercise of claims by the Controller or defence against legal claims issued towards the Controller,
 - d) storage of documents containing personal data (agreements/contracts, invoices) for settlement purposes,
2. In the remaining scope (in particular in order to process the data for marketing purposes) providing the data is voluntary; however, the Controller notes that failure to provide the data specified in the data forms in the process of registration and creating a Customer Account impedes the registration and creation of a Customer Account, and when an order is placed without the registration of a Customer Account, it impedes both placing and processing of the User's order.

§ 10 [PROFILING]

1. Pfliegerer Polska may carry out profiling within the meaning of Article 4(4) of the GDPR, i.e. apply a form of automated processing of your personal data which involves using that data to evaluate certain personal characteristics of a natural person who is interested in Pfliegerer Polska's products. In other words, Pfliegerer Polska may make automated decisions based on the personal data we possess about you. By doing so we save the information about your purchases so that next time we can offer you further products tailored to your preferences, expectations and needs as a customer of Pfliegerer Polska.
2. In connection with profiling, the Data Controller has implemented suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express their point of view and to contest the decision.
3. Decisions consisting in presenting you with a specific Controller's commercial offer shall be made based on an assessment of certain information about Customers of Pfliegerer Polska, including the record of your payment transactions, history of website visits, location data, behavioural data of the Store user.
4. Profiling shall take place for marketing purposes of the Controller (legitimate interest of the Controller).
5. You shall have the right to object at any time to the processing of your personal data in relation to profiling for marketing purposes. The objection should be submitted to the Data Controller in writing to the correspondence address indicated in § 1 or by e-mail at rodo@pfliegerer.com

§ 11 [TRANSFER OF PERSONAL DATA OUTSIDE THE EEA]

1. Your personal data may be transferred outside the European Economic Area (EEA) to countries such as Belarus, Russia, Ukraine in connection with the sale or delivery of goods by the Controller. As these countries have not been recognised by the European Commission as providing an adequate level of personal data protection, transferring data to these countries entails greater risks.
2. The transfer of personal data outside the EEA shall take place on the basis of Article 49 (1)(b) of the GDPR, which allows the transfer of personal data in such a situation, provided that it is

necessary for the performance of the contract between the data subject and the Controller or on the basis of Article 49 (1)(c) of the GDPR, which allows the transfer of personal data, if it is necessary for the performance of the contract concluded in the interest of the data subject.

3. The Controller shall implement the necessary technical and organisational measures in order to maintain the security of the Customer's personal data, including, inter alia, the processing of Customer's personal data only by authorised persons, storing their data on carriers and in places ensuring their security.

§ 12 [COOKIE POLICY]

1. In order to tailor the sales of specific products to individual needs and preferences of Customers, information is collected in the form of so-called cookie files (cookies). Cookie files are IT data, including text files, which are stored in the web service user's end device and are intended for use while visiting the web service.
2. Cookie files are used to identify the software used by the web service user and to optimise the functioning and safety of the web service. Cookies contain data of the domain from which they come, they specify time of their storage on a given device and have a unique number assigned.
3. The entity placing cookies on the web service user's end device and accessing them shall be the web service Administrator.
4. We use two types of cookie files on our website:
 - a) session cookies - temporary files which are stored on the user's end device until logging out, leaving a website,
 - b) persistent cookies - stored on the user's end device for a time specified in the cookie data parameters or until they are deleted by the user.
5. Detailed information about the possibility and methods of using cookie files and setting the mechanism for handling them by the user's software is available in the settings of the user's software (web browser).
6. The user may restrict the use of cookie files; however, this restriction may affect the functionality and accessibility of certain functions available at the web service sites.

§ 13 [CHANGES TO PRIVACY POLICY]

1. This Privacy Policy shall apply from 2 January 2020.
2. The Controller reserves the right to amend the Privacy Policy of the web service, which may be due to the development of Internet technology or possible changes in the law on personal data protection and the development of our web service.
3. Any and all changes to the Privacy Policy shall be communicated in a visible and comprehensible manner on the store's website.