

Information of the data Controller under art. 13 sec. 1 and 2 **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** (hereinafter referred to as the Regulation):

- 1) The Controller of personal data under art. 4 point 7 of the Regulation is Zepter International Poland sp. z o.o. with its seat in Warszawa, Domaniewska 37 str., 02-672 Warszawa, e-mail zepter@zepter.com.pl, tel. +48 22 565 84 84, +48 22 565 80 00, NIP 526-020-01-87.
- 2) The Controller has appointed a data protection officer who can be contacted with at the e-mail address iod@zepter.com.pl or at the address: The Data Protection Officer Zepter International Poland, 37 Domaniewska 37 str, 02-672 Warszawa.
- 3) Personal data gained by the Seller in the process of conclusion of agreements mentioned below or while their performance will be processed under and for the purpose:
 - a. under art. 6 sec. 1 point b of the Regulation **for the purposes of conclusion and performance of such agreements as:** (i) agreement for performing an Electronic service Account, (ii) Sales agreement and (iii) agreement of membership in the loyalty program ClubLive100 (hereinafter referred to as ClubLive100),
 - b. under art. 6 sec. 1 point c of the Regulation **for the purposes of fulfillment of legal obligations** to which the Controller is the subject, e.g. issuing and keeping invoices and other accounting documents, in case of indication by the Client the recipient of the Products other than the Client - informing the recipient of the Products about the source of obtaining his personal data, giving responses to complaints within the time limit provided for by the applicable regulations,
 - c. under art. 6 sec. 1 point f of the Regulation **within legitimate interests conducted by the Controller**, namely (i) for the purpose of direct marketing of products and services of the Controller, (ii) in order to set, protect and to pursue claims, (iii) to prepare reports, analyzes, statistics for the Controller's internal needs, (iv) to ensure network and information security.
- 4) **Intended recipients of personal data:** entities by which the Controller performs the Sales agreement (e.g. a courier company, an authorized entity servicing the Controller's devices), in case of indication by the Client the recipient of the Products other than the Client - the recipient of the Products, entities by which the Controller conducts

marketing activity for its products and services (e.g. a post provider, a telecommunication provider, an advertising provider), entities by which the Controller provides Electronic services in the Shop (e.g. providers of IT services), entities to which the Controller outsources advisory, tax, audit services, legal support, entities running paying business (e.g. a bank).

- 5) **Personal data will be stored within the period depending on the purpose** for which it was collected and **the legal basis for the processing**, this is:
 - a. conclusion and performance of the agreements – (i) Agreement for performing an Electronic service Account - till the end of the Agreement, (ii) Sales agreement – till the Sales agreement is performed and (iii) the agreement of membership in ClubLive100 – till the end of the agreement,
 - b. fulfillment of legal obligations that the Controller is the subject – till the legal obligations are fulfilled by the Controller,
 - c. conduction of legally reasoned interests of the Controller: (i) direct marketing of products and services of the Controller – till objection is submitted, (ii) to set, protect and to pursue claims – till limitation of the claims or till accepting by the Controller the reasoned objection, (iii) preparing reports, analyzes, statistics for the Controller's internal needs – till accepting by the Controller the reasoned objection, (iv) to ensure network and information security – one month or till accepting by the Controller the reasoned objection.
- 6) **A data subject has the right** to access to the content of his data and the right to make corrections, removal, limitation of processing and the right to move the data.
- 7) Moreover, a data subject **has a right to submit**, at any time, **an objection reasoned** by his particular situation regarding processing of his personal data for reasons of legitimate reasoned interests of the Controller. If the Controller proceeds his personal data for the direct marketing purposes, in accordance to its legitimate reasoned interests, a data subject **has a right to submit the objection**. If the Controller accepts the reasoned objection or in case of submission of the objection, the data of the particular data subject will be no longer proceeded.
- 8) In order to exercise the rights referred to above, the data subject should contact the Seller or the Data Protection Officer of the Seller using the data indicated above.

- 9) The data subject has also **the right to lodge a complaint** to the General Inspector of Personal Data Protection or to another such authority pointed in his place if recognizes that the processing of his personal data is without prejudice to the regulations on personal data protection, including the Regulation.
- 10) Submission of personal data is voluntary, but making known personal data required by the Seller for a particular agreement (marked by "*" in the process of conclusion of a particular agreement) is necessary to conclude and execute the agreement for performing an Electronic service Account, Sales agreement and/or the agreement of membership in ClubLive100 and missing data means no possibility to conclude and perform above mentioned agreements.

The Seller as an entity obliged to process personal data in a manner safe and compliant with the applicable regulations, he also informs that he has a Privacy Policy, which can be viewed on the Shop's website.