

Privacy Policy of ZEPTER online services

1. Firstly,

We invite you to read our Privacy Policy, which indicates the rules of processing of your personal data by us. The Privacy Policy (hereinafter: PP) applies to all our online services, including the ones at www.zepter.pl.

2. Personal data controller

The personal data controller is **Zepter International Poland sp. z o.o.** (hereinafter: **Zepter INTL Poland**), a company registered in the register of entrepreneurs kept by the District Court for the capital city of Warsaw in Warsaw, XIII Commercial Department of the National Court Register, KRS 0000107635, NIP 5260200187, REGON 011524677, share capital: PLN 224,500.

Contact:

address: ul. Domaniewska 37, 02- 672 Warsaw (Poland)

Phone No.: (22) 565 84 84, (22) 565 80 00 / Helpline (22) 230 99 40

E-mail: zepter@zepter.com.pl

3. Data Protection Officer (DPO)

The DPO of Zepter International Poland sp. z o.o. is Mrs. Justyna Buzala, who can be contacted by e-mail: iod@zepter.com.pl, or traditionally – by post to the following address: IOD Zepter INTL Poland, ul. Domaniewska 37, 02-672 Warsaw (Poland).

4. Purpose of personal data processing and legal basis

Your personal data will be 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: the "GDPR") in order to/for:

- a) enable an online contact form service [Article 6 (1) (b) of the GDPR] - for the time necessary to settle your case, including sending marketing information about products or services selected by you, no longer than for 6 months after settling the matter for archiving purposes or until the claims are time-barred as indicated in the applicable law,
- b) enable an online marketing form service, including the "callback" type [Article 6 (1)(a) of the GDPR] – in case of a consent granted to marketing contact using the medium indicated by you for a one-time marketing contact – a telephone number or e-mail - given by you, until you are contacted by Zepter INTL Poland or you withdraw your consent (depending on whichever comes first). You can withdraw the consent at any time, without affecting the processing based on consent before such withdrawal,
- c) conclude and perform an Agreement or take steps at the request of the data subject prior to entering the Agreement [Article 6 (1)(b) of the GDPR] – until the given activity is provided,
- d) fulfil legal obligations incumbent on Zepter INTL Poland, e.g. issuance and storing invoices and other accounting documents, preparing tax information, documenting and keeping settlements of public law receivables [Article 6(1)(c) of the GDPR] - for the period indicated in the relevant provisions of law,
- e) direct marketing of Zepter INTL Poland's products and/or services – which results from the legitimate interest of Zepter INTL Poland [Article 6(1)(f) of the GDPR in connection with recital 47 of the GDPR] – until an objection is raised,
- f) establishment, defence and enforcement of claims [Article 6(1)(f) of the GDPR] – for the period of limitation of claims indicated in the relevant provisions of law,

g) creation of summaries, analyses and statistics for internal purposes of Zepter INTL Poland – due to our legitimate interest [Article 6 (1)(f) of the GDPR] - until Zepter INTL Poland takes into account a justified objection or until objection is raised,

h) enabling participation in the Zepter INTL Poland`s loyalty and discount program electronically [Article 6 (1)(a) of the GDPR] – in case of a separate consent for joining the program, e.g. in case of a person invited to the program – by clicking the confirmation link for subscription to the program in an e-mail, selecting an electronic check box with a dedicated consent in the Service, by phone, etc. [Article 6 (1)(a) of the GDPR together with Article 172 of the Act of 16 July 2004 - Telecommunications Law and Article 10 of the Act of 18 July 2002 on the provision of electronic services], until its withdrawal. Withdrawal of consent may take place at any time, but it does not affect the processing of data carried out before such withdrawal;

i) transfer of marketing content electronically [Article 6 (1) (a) of the GDPR] – by e-mail (Newsletter) and/or by phone by Zepter INTL Poland [Article 6 (1) (a) of the GDPR in conjunction with Article 172 of the Act of 16 July 2004 - Telecommunications Law and Article 10 of the Act of 18 July 2002 on the provision of electronic services] - in case of giving a separate consent, e.g. by subscribing to Newsletter and/or expressing a separate consent to marketing telephone contact, until its withdrawal. The consent may be withdrawn at any time, without affecting the processing based on consent before such withdrawal.

Personal data, in case of collecting them directly from the data subject, are provided on a voluntary basis.

If your personal data are provided to us (upon your consent) by a participant of our loyalty and discount program (i.e. which means that the data has not been collected directly from you), we will additionally inform you from which source we have the data, i.e. where we`ve got it from.

Refusal to provide personal data or failure to confirm the willingness to participate in the program - may result in the inability to provide a given service.

5. To whom we transfer personal data

1. The recipients of personal data may be entities from the group of enterprises within the meaning of the GDPR, which includes the Controller and entities/persons cooperating with us in the implementation of the objectives indicated in point 4 above.

2. If case of transfer data outside the European Economic Area (hereinafter: EEA), use the tools of entities that have their registered office outside the EEA or that may store data outside the EEA, (your personal data will not be transferred to international organizations), we will apply all legally available protection measures (e.g. provided for in Article 46 of the GDPR) to secure such transfer of data. The transfer of data outside the EEA may take place on the basis of the exceptions provided for in Article 49 of the GDPR, provided that the conditions set out in this article apply. Information on the safeguards used can be obtained by contacting our DPO or us directly.

6. Your rights

1. You have the right to access your data and to rectify, delete, limit processing, transfer it (if applicable).

2. Personal data may be processed in an automated manner due to participation in a loyalty program, in which participants are offered benefits in a form of a reduction in the price of the Product – the price is then determined individually on the basis of an automatically made decision due to participation in the loyalty program, which is necessary to conclude or perform a contract between the data subject, and Zepter INTL Poland as controller; profiling is excluded. Zepter INTL Poland informs that no decisions producing legal effects concerning a person or similarly significantly affecting you will not be based solely on automatic processing of personal data and do not involve such an automatically made decision.

7. Objection

In addition to your rights indicated in point 6 above, you also have the right to object to the processing of your personal data for reasons related to your particular situation, as well as the right to object to the processing of your data by us for the purposes of direct marketing of our products and/or services.

8. Complaint

You have the right to lodge a complaint with the supervisory authority, which in Poland is the President of the Office for Personal Data Protection, if you consider that the processing of personal data concerning you is unlawful.

9. The act referred to in here

GDPR – 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 (OJ UE L 2016 No. 119, p. 1