

## PRIVACY POLICY

### § 1.

#### [General provisions]

1. This Privacy Policy sets out the rules of processing personal data and other data collected from Users in connection with the operation of the Service.
2. This Privacy Policy is an integral part of Terms and Conditions of the Service.

### § 2.

#### [Definitions]

The terms used in this policy mean:

- a. Controller – FROPT spółka z ograniczoną odpowiedzialnością, with its registered office in Krakow, 30-110 at J. I. Kraszewskiego street 24/13, entered in the Register of Entrepreneurs of the National Court Register maintained by the District Court for the City of Krakow-Śródmieście in Krakow, XI Commercial Division of the National Court Register under number: 0000939450, Tax Identification Number 6772441173;
- b. 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 (General Data Protection Regulation);
- c. Contact Form - a service enabling the User to providing personal data to the Controller, in order to communicate with the User by means of electronic communication in providing Users with commercial information about Controller products and services;
- d. Service - internet service available at fropt.pl;
- e. User - a natural person using the Service;
- f. Newsletter - the service provided to Users (by the Controller, via e-mail) consisting in providing Users with commercial information about FROPT products and services;
- g. Shopping List - a shopping list created by the User at the Service.

### § 3.

#### [Personal data protection]

1. The Controller is the controller of the personal data within the meaning of the Article 4 (7) of the GDPR in relation to personal data collected via the Service.
2. The user has the right to access and rectify the personal data collected by the Controller. The User also has the right to request the deletion or restriction of the processing of his/her personal data and the transfer of the data to another controller under the terms of generally applicable laws. The User is also entitled to object to the processing of his/her personal data on the basis of the provision of Article 6(1)(f) GDPR, including, in particular, in the situation of profiling on the basis of the processed personal data.
3. The rights, referred to in section 2 may be exercised by sending a request to the Controller by an e-mail to [hej@fropt.pl](mailto:hej@fropt.pl).
4. The User is entitled to submit a complaint to the supervisory body (the President of the Office for Personal Data Protection) whenever there is a suspicion that his personal data are being processed in violation of the law.

5. In the event of a change of personal data, the User immediately informs the Controller about this fact by sending an appropriate e-mail to [hej@fropt.pl](mailto:hej@fropt.pl).
6. Users' personal data is not transferred to recipients of data within the meaning of the GDPR, except for cases where:
  - a. such obligation is incumbent upon the Controller under generally applicable legal provisions, to entities processing data on behalf of the Controller;
  - b. personal data will be transferred to entities processing them on behalf of the Controller.
7. Personal data may be processed by automated means (also in the form of profiling), but will not produce legal effects or materially affect Users.
8. In connection with profiling, no special category data will be processed.
9. Profiling takes place in order to tailor marketing offers to Users' preferences.
10. personal data collected by the Controller via the Service, shall not be transferred to third countries and international organizations.
11. Personal data collected by the use of the order form or the order assistance form, as well as collected in connection with the use of other services available through the Service, including the Shopping List, may also be processed for the purpose of marketing activities by the Controller, based on the provision of Article 6(1)(f) GDPR, where the legitimate interest pursued by the Controller is the processing of personal data for direct marketing purposes.
12. The User's activities on the Service may be subject to profiling aimed at adapting the content displayed on the Service and provided to the User as part of marketing communications to the User's profile established on the basis of an analysis of the User's activities on the Service. Profiling - in each case in which it refers to an identified or identifiable natural person - will take place on the basis of the provision of Article 6(1)(f) GDPR, where the Controller's legitimate interest is profiling for direct marketing purposes.

#### **§ 4.**

##### **[Orders]**

1. To place an order via the Service, User shall provide his personal data. Providing data is voluntary but necessary to place an order.
2. By using the order form, the Controller collects the following personal data:
  - a. first name and last name;
  - b. address for correspondence;
  - c. phone number;
  - d. e-mail address.
3. The Controller processes personal data collected via the order form for the purpose of conclusion of a contract with the User and its proper performance.
4. Personal data collected via the order form are processed under the Article 6 (1)(b) GDPR.
5. Personal data collected for this purpose are processed until the performance of the contract concluded with the User. After this time, the data may also be processed for the purpose of asserting or protecting against claims arising from this contract, which will happen on the basis of the provision of Article 6(1)(f) GDPR, in the exercise of the Controller's legitimate interest, until the

expiry or limitation of these claims.

6. Personal data collected via the order form will also be processed in order to fulfil the obligations of the Controller resulting from the generally applicable regulations, including tax regulations, which will be done under the Article 6 (1) (C) GDPR, until these obligations expire.

## **§ 5.**

### **[Newsletter and Shopping list]**

1. In order to use the Newsletter or to send the generated Shopping List to the e-mail address indicated by the User, it is necessary for the User to provide his/her personal data. The provision of the data is voluntary but necessary for the use of the aforementioned services.
2. Through the Newsletter form, we collect the User's e-mail address.
3. The Newsletter service is based on periodic, free of charge, sending by FRØPT to the e-mail address given by the User, information of commercial and marketing nature concerning the Controller.
4. Use of the Newsletter service is available to every User after providing in the Newsletter service section of the Site his/her email address and then accepting the subscription to the Newsletter service (by clicking on the "Subscribe" button). Clicking the "Subscribe" button activates the Newsletter service and signifies acceptance of its provision.
5. Activation of the Newsletter service signifies the User's consent to the sending of marketing and commercial information by the service by means of electronic communication within the meaning of the Act of 18 July 2002 on Electronically Supplied Services, as well as consent to the use by the Controller of telecommunications terminal equipment for the purpose of direct marketing and the transmission of commercial information in this channel of communication in accordance with the provisions of the Telecommunications Law.
6. The User may at any time and without stating any reason resign from the Newsletter service by clicking on the resignation link contained in the Newsletter message sent to him/her. Resignation shall mean immediate termination of the Newsletter service, i.e. discontinuation of further receipt of messages by the User, and shall also result in the removal of the User's data from the Newsletter service recipient database.
7. All content transmitted within the Newsletter service is protected by copyright. The copyright for the aforementioned content is held by FRØPT, or any other entity from which the Controller has obtained the appropriate legal title for its use.
8. The user can lodge a complaint about the Newsletter service by sending an e-mail to: [hej@fropt.pl](mailto:hej@fropt.pl).
9. The complaint should contain data which makes it possible to identify the User submitting the complaint, a description of the irregularity and the complaint request. The time limit for the

Controller to consider a complaint is 14 days. The User will be notified of the consideration of the complaint or lack thereof by e-mail to the e-mail address provided by the User.

10. The user, who is a consumer as defined by the applicable legislation, may, in matters concerning the Newsletter service, make use of out-of-court methods for the handling of complaints and the assertion of claims.
11. The Controller processes personal data collected by means of the form in order to carry out marketing activities through the Newsletter, on the basis of Article 6(1)(a) GDPR, i.e. on the basis of consent obtained by entering an e-mail address into the form and clicking on the "Subscribe" button.
12. In connection with the User's use of the Export Shopping List option, the Controller collects personal data in the form of an e-mail address.
13. The Controller processes the personal data collected in connection with the export of the Shopping List in order to handle this request and to send the Shopping List generated by the User to the email address indicated by the User, on the basis of Article 6(1)(a) of the GDPR, i.e. on the basis of the consent obtained as a result of entering an email address into the form and clicking the "Send Shopping List to your email" button.
14. Consent to the export of the shopping list is voluntary but necessary for the use of the above services. The user may withdraw it at any time
15. Data collected for this purpose are processed until the consent given for their processing is withdrawn.

## **§ 6.**

### **[enquiries]**

1. If the User makes an enquiry to the Controller via any type of Contact Form or by any other means, including electronically, the Controller will process the personal data provided by the User in that enquiry.
2. The provision of personal data in the Contact Form is voluntary, but necessary in order to be able to handle the enquiry.
3. The controller processes the data sent in the request in order to correspond and contact the User.
4. The personal data sent in the enquiry are processed in pursuit of the Controller's legitimate interest, on the basis of Article 6(1)(f) GDPR, i.e. in connection with the handling of the enquiry.
5. Data processed for the purpose of handling an enquiry is processed for a period of 10 years from the receipt of the enquiry or the conclusion of the matter to which the enquiry related.

## **§ 7.**

### **[Security of personal data]**

1. The User's personal data are processed on the highest-class equipment and servers in appropriate security roasted information storage centers accessible only to authorized persons.
2. The Controller shall process the User's personal data in compliance with all the legal and technical requirements imposed on it by generally applicable data protection legislation.
3. The Controller shall implement technical and organisational measures to ensure a level of security appropriate to the risks identified.

4. The User's personal data, within the limits set out in this policy and generally applicable legal regulations, will be kept confidential.

## **§ 8.**

### **[UX RESEARCH]**

1. The Controller may carry out UX research, which involves researching the needs of Users or their shopping experience, including through the Service.
2. Personal data contained in the application form, provided to the Controller in connection with a planned or completed purchase of our products or obtained in connection with the use of other services available through the Service, including the Shopping List, will be processed for the sole purpose of:
  - a. establishing contact and for FRØPT to investigate the level of satisfaction of the User's needs in relation to a purchase made or to be made with us (hereinafter the "survey") - which is the legitimate legal interest of FRØPT, in accordance with Article 6(1)(f) GDPR;
  - b. to verify the User's participation in previous surveys of the nature described above after the current survey has been completed - which is the legitimate legal interest of FRØPT, in accordance with Article 6(1)(f) GDPR.
3. Data collected for the purpose of participating in a specific research will be processed for the duration of the research. If a User is not selected to be contacted for a research, their data will be deleted from our database within 10 days of the date on which it was collected.
4. Beyond the aforementioned period, data in the form of user's e-mail address will only be processed for the purpose and for the period necessary to verify user's participation in previous research, but no longer than 10 years from the date on which they were collected.
5. The provision of personal data by the User for the purpose of participating in the research is voluntary and the refusal to provide such data will not entail any negative consequences, but will prevent participation in the survey.

## **§ 9.**

### **[Cookies policy]**

1. For the convenience of Users, the Controller uses cookies, among other things, to adapt the Service to the needs of Users and for statistical purposes. Cookies are small text files sent by a website visited by an Internet user to the Internet user's device.
2. The data collected in the logs is only used for the administration of the Service.
3. In accordance with the practice of most websites, we store HTTP requests made to the server (server logs). Accordingly, these may be stored:
  - a. IP addresses from which Users browse the Service;
  - b. the timing of the enquiry;
  - c. time of sending the reply;
  - d. the name of User's device;
  - e. information about errors in communication between the Service and the User's device;

- f. the so-called referer link;
  - g. information about the user's browser.
4. The collected logs are stored for a period of 10 years as support material for the administration of the Service. The information contained in them is not disclosed to anyone except those authorised to administer the Service. Statistics may be generated from the log files to assist in administration. Aggregate summaries in the form of such statistics do not contain any identifying characteristics of visitors to the Service.
  5. The following cookies are used on the Service:
    - a. session cookies, including Google Analytics session cookies and Google Advertising Domain cookies (which expire at the end of the respective session and when the browser is closed);
    - b. long-term Google Universal Analytics cookies (expiring after 730 days);
    - c. Short-term Google Universal Analytics cookies (expiring after 1 day);
    - d. Facebook cookies (expire after 90 days).
  6. Third parties sites whose content is presented in the Service may also use cookies, which allow Users to log in and serve ads that relating to the User's behaviour.
  7. Web browser allows the change of the cookies settings. Lack of change of these settings shall be considered as the consent for the cookies specified above.

## **§ 10.**

### **[Contact]**

1. The User may contact the Controller at any time to obtain information on how the Controller processes or intends to process his personal data.
2. To the extent unregulated in this policy, generally applicable law applies.
3. The Controller can be contacted by sending a message to the following e-mail address: [hej@fropt.pl](mailto:hej@fropt.pl).