# Privacy policy of the B2B.INNTOO.PL online shop

#### **GDPR Information Clause**

In performance of the obligations provided for in 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 "GDPR"), we provide the following information:

## Who is the controller of your personal data?

The controller of your personal data is INNTOO sp. z o.o. sp. k. (hereinafter the "Company") entered in the National Court Register (KRS) by the District Court for Kraków-Śródmieście in Kraków, 11th Commercial Division of the National Court Register, the Company's details: ul. Polonijna 23/U1, 30-668 Kraków, KRS number: 0000645288, tax identification number NIP: 6762516024, national official business register REGON: 365782830. The Company is the sole operator of the online shop at b2b.inntoo.pl (hereinafter the "Shop", "we", the "Controller").

#### How to contact us regarding your personal data?

Write to us at office@inntoo.pl (e-mail) or ul. Polonijna 23/U1, 30-668 Kraków (regular mail).

## Where have we got your personal data from?

You have given them to us when registering to our Shop. We do not purchase client databases or prospective client databases or acquire them in any other way.

#### What personal data of yours do we process?

Name, surname, e-mail address, correspondence address, telephone number, your business name, VAT identification number, tax identification number NIP, national official business register REGON, password to your account in our Shop, name and surname of the contact person.

## What is the purpose and legal basis of us processing your personal data?

We process your personal data under Art. 6(1)(b) of GDPR, i.e. for performance of a contract to which you are a party and execution of your order or in order to take steps prior to entering into a contract, including but not limited to the following purposes: to allow you to use our Shop, view its product and service range and do shopping via the Shop and to inform you about our terms of cooperation; to create and manage your account and to solve any technical problems; to execute your orders:

## We also process your personal data on the basis of your consent for the following purposes:

to analyse our website data stored in cookies; to run marketing activities by phone or by electronic means of communication; to send you our newsletter.

You can withdraw your consent to the processing of your personal data in the above scope at any time, without providing your reasons, in the same way you granted it to us. We will process your personal data in the above scope until you withdraw your consent. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal. In addition, we process your data under Art. 6(1)(c) of GDPR because provisions of law require that we process your data for tax and accounting purposes. We also process your personal data under Art. 6(1)(f) of GDPR for the purposes specified below because these are our legitimate interests: to monitor your activity in our Shop, including searching for products and browsing the product and service range, to register your order history and to manage your other activity in our Shop; carry out marketing activities towards you, including direct marketing of our own services – you can object to it, see below; contact you, including contact for purposes related to the permissible marketing activities, through the available communication channels, particularly by e-mail and phone – upon your consent; ensure safety of the services we provide to you via electronic means, including: enforcing the internal terms and conditions of our Shop, counteracting frauds and misuses and ensuring traffic safety; conduct studies and analyses of website traffic in our Shop, for the purposes of functionality of the platform, improved management of services or estimation of the main interests and needs of visitors, among other things; handle your requests sent via our contact form if they are not directly related to the performance of the contract; maintain business relations with you; assert our claims or defend against claims; conduct statistical analyses; store data for the purpose of archiving them and ensuring their accountability.

#### Do you have to give us your personal data?

If you want to conclude a contract with us and perform it, you have to provide us with the following personal data (contractual prerequisite for contract conclusion): name, surname, e-mail address, full correspondence address and telephone number as well as tax identification number NIP, VAT identification number and business name – in the case of entrepreneurs. account password – if you register in our Shop for free. your account number – if we are required to return the money you paid us. Providing the above data is voluntary, but if you refuse to do so, we will not be able to conclude a contract with out: as a result, you will not be allowed to do shopping via our Shop or use the website in any other way. If provisions of law so prescribe, we can demand that you also provide other data that are required for tax or accounting purposes. Otherwise provision of your data is voluntary.

# What are your rights towards us regarding data processing?

You have the right to demand that we (the Controller):

- 1. Give you access to the content of your data under Art. 15 of GDPR,
- 2. Rectify your data under Art. 16 of GDPR,
- 3. Erase your data under Art. 17 of GDPR ("right to be forgotten"),
- 4. Restrict the processing of your data (for instance only to data storage) under Art. 18 of GDPR,
- 5. Transfer your data under Art. 20 of GDPR.

case we will case to process those data for the specified purposes. Yu can also withdraw your consent to us processing your personal data at any time if they are processed on the basis of your consent. You can lodge a complaint with a supervisory authority, i.e. the President of the Personal Data Protection Office (address: ul. Stawki 2, 00-193 Warsaw).

You can exercise the above rights: regarding the demand for access to your data – when you want to know whether we process your personal data; and if so, on what grounds, in what scope and for what purpose, regarding the demand for rectification of your data – when you determine that your data are incorrect or incomplete; regarding the demand for erasure of your data – in the cases specified in Art. 17 of GDPR; regarding the demand for restriction of processing of your data – in the cases specified in Art. 18 of GDPR: as a result, we will only store your data and their processing will require your consent unless there are other circumstances as specified in Art. 18(2) of GDPR. regarding the demand for transfer of your data – when you need to obtain a set of the data processed by us so that you can send them to another enterprise.

#### Who can we make your personal data available to?

We make or can make your personal data available to:

- 1. enterprises which provide maintenance and IT servicing to our Shop (e-mail server, domain, cloud computing, server of our messengers etc.), KYLOS sp. z o.o., ul. Wróblewskiego 18, 93-578 Łódź, Google Commerce Limited, 70 Sir John Rogerson's Quay Dublin 2, D02 R296 Ireland, WhatsApp Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, among other enterprises.
- 2. enterprises dealing with analyses of electronically processed statistical data,
- 3. enterprises providing product delivery services,
- 4. authorised public authorities under the generally applicable provisions of law.
- 5. a legal office for complaint handling, legal advice, debt collection as well as assertion of our claims or protection of our rights,
- an accounting office for accounting purposes,
- 7. other entities as well upon your consent.

#### How long do we store your personal data?

We store your personal data for the period necessary for completion of the purpose of their processing and required by the generally applicable provisions of law. We store your personal data throughout the term of the contract and for a maximum of three years from the expiry of the contract or for the duration of judicial or administrative proceedings, if applicable. If your personal data are stored before the conclusion of the contract, we store for a maximum of one year from handover. We store your personal data for marketing purposes for the earliest of the following periods: for one year from the time we obtain them, throughout the term of the contract or until you object to such processing. Do we transfer your data outside the European Economic Area? At present, we do not. However, in the future your personal data can be transferred outside the European Economic Area to entities providing us with IT systems and solutions, ones which can store personal data on servers located outside EEA (including the United States). In such a case the grounds for transferring your data outside EEA can be a decision of the European Commission acknowledging an appropriate level of protection or application of appropriate legal safeguards, which notably are the standard contractual clauses of personal data protection, as approved by the European Commission. If the European Commission does not issue the decision specified above and in the absence of appropriate safeguards, personal data can be transferred to a third country on the basis of your explicit consent. You have the right to obtain a copy of the personal data transferred to a third country.

# Do we process your personal data automatically (including through profiling) in a manner affect your rights?

No, we do not.

#### Information on cookies

We can use cookies when the user uses the services made available via our online shop (login to the account, shipment tracking, purchase history etc.). The cookies that can be used in our online shop are associated with the web browser of the given computer only – the user remains anonymous (no name or surname of the user is provided). These are the data stored by our server on the user's computer, ones which can be read out by our server every time the user's computer connects. Cookies provide statistical data on user traffic and the manner in which they use individual pages of our website. We can also set cookies to monitor user traffic in the website. You can choose how cookies are managed at any time by switching from automatic cookie management to personalised cookie management (user settings). Detailed information in this respect is given by providers of Internet supporting software (web browsers), usually in the "Internet options" tab or a similar tab. If the user disables cookies in their web browser – either by blocking or monitoring them – it can hinder or even prevent using some of our services. You can save your login, e-mail address and the password to your account in the Shop in cookies: as a result, the above fields will already be completed when you place a new order or send a new request. These cookies expire after a year. If you visit the login page, we will create a temporary cookie to check whether your web browser enables cookies. This cookie does not contain any personal data and will be discarded once you close your web browser. When you log in, we additionally create several cookies necessary for saving your login information and the selected display options. Login cookies expire after two days and display option cookies after a year. If you log out of account, login cookies will be removed. We also store personal information entered in the profile for users who have registered on our website. Every user can view, rectify or erase their personal details at any time (except for the userna