



## Privacy Policy

This document regulates the principles of personal data processing and the use of cookies and other tracking technologies in connection with the functioning of:

1. online store Grupa Weba sp. z o.o. with its registered office in Poznań available at <https://www.products.weba.com.pl> and
2. image website Grupa Weba sp. z o.o. with its registered office in Poznań <https://www.weba.com.pl/en>

Full registration data of the store administrator and the website:

**Grupa Weba sp. z o.o. with** its registered office in Poznań (61-037), at ul. Krańcowa 24, registered in the Register of Entrepreneurs of the National Court Register under KRS number 0000664594, NIP: 7772619447, REGON: 63426528800000, share capital: PLN 492,000.00

This privacy policy has been constructed as a question + answer system, which will ensure the transparency and readability of the presented information. Each of the following questions is also a hyperlink that takes the reader to the answer to the question.

## Table of Contents

***# 1: Who is the administrator of your personal data?***

***# 2: Who can be contacted regarding the processing of personal data?***

***# 3: What information do we have about you?***

***# 4: Where do we get your personal data from?***

***# 5: For what purposes do we process your personal data?***

User account - details

Orders - details

Complaints and withdrawal from the contract - details

Newsletter - details

Comments and product reviews - details

Correspondence handling - details



Tax and accounting obligations - details

Archive - details

Own marketing - details

Analysis, statistics, optimization – details

***# 6: How long will we keep your personal data?***

***# 7: Who are the recipients of your personal data?***

***# 8: Do we transfer your data to third countries or international organizations?***

***# 9: Do we use profiling? Do we make automated decisions based on your personal data?***

***# 10: What rights do you have in relation to the processing of your personal data?***

***# 11: Do we use cookies and what are they exactly?***

***# 12: On what basis do we use cookies?***

***# 13: Can you disable cookies?***

***# 14: For what purposes do we use our own cookies?***

***# 15: What third party cookies are used?***

***# 16: Do we track your behavior on our website and store?***

***# 17: Are we targeting you with targeted ads?***

***# 18: How can you manage your privacy?***

***# 19: What are server logs?***

In the event of any doubts related to the privacy policy, you can contact the administrator via e-mail, by sending a message to the following e-mail address: [export@weba.com.pl](mailto:export@weba.com.pl).

**# 1: Who is the administrator of your personal data?**

The administrator of your personal data is Grupa Weba sp. z o. o. with its registered office in Poznań (61-037), at ul. Krańcowa 24, registered in the Register of Entrepreneurs of the National





Court Register under KRS number 0000664594, NIP: 7772619447, REGON: 63426528800000, share capital: PLN 492,000.00

### **# 2: Who can be contacted regarding the processing of personal data?**

As part of the implementation of personal data protection in our organization, we decided not to appoint a personal data protection officer due to the fact that in our situation it is not mandatory. In matters related to the protection of personal data and broadly understood privacy, you can contact us at the following e-mail address: [export@weba.com.pl](mailto:export@weba.com.pl).

### **# 3: What information do we have about you?**

Depending on the purpose, we may process the following information about you:

- name and surname,
- residence address,
- business address,
- (NIP) Tax Identification Number,
- e-mail address,
- phone number,
- data contained in correspondence addressed to us,
- bank account number.
- IP address,
- image (profile photo),
- products that you have viewed in the store,
- details of orders placed,
- details of abandoned carts,
- activity in relation to messages sent as part of the newsletter,
- information about the operating system and the web browser you are using,
- subpages viewed,
- time spent on page,
- transitions between individual subpages,
- clicks on individual links,
- source from which you go to our page,





- age range you are in,
- your gender,
- your approximate location limited to the town.
- your interests based on your online activity.

We have described the scope of the processed data precisely in relation to each processing purpose. Information in this regard can be found in the further part of this policy.

#### **# 4: Where do we get your personal data from?**

In particular, you provide us with the data yourself if you:

- register a user account,
- place an order in the store,
- submit complaints or withdraw from the contract,
- subscribe to the newsletter,
- add a comment or opinion about the product,
- are contact us.

In addition, some information about you may be automatically collected by the tools we use:

- the website, store and newsletter system mechanisms collect your IP address,
- the website and store mechanism collect information about the products you have viewed, the details of the orders you place, including the unfinished ones,
- the newsletter system mechanism collects information about your activity in relation to the content sent to you as part of the newsletter, such as opening messages, clicking on links, etc.,
- Google Analytics collects a lot of information about how you use our store and website.

#### **# 5: For what purposes do we process your personal data?**

Below is a list of the purposes of the processing along with the relevant legal grounds for the processing.

- registration and maintenance of a user account – art. 6 (1b) GDPR,
- order handling - art. 6 (1b) GDPR,
- handling complaints or withdrawing from the contract - art. 6 (1f) GDPR,
- sending a newsletter – art. 6 (1a) GDPR,
- handling comments or opinions about the product – art. 6 (1a) GDPR,





- correspondence service – art. 6 (1f) GDPR,
- implementation of tax and accounting obligations - art. 6 (1c) GDPR,
- creating an archive for the possible need to defend, establish or pursue claims, as well as for the purpose of identifying the returning customer – art. 6 (1f) GDPR,
- own marketing – art. 6 (1f) GDPR,
- analysis, statistics and optimization – art. 6 (1f) GDPR,

### **User account - details**

**1.** When creating a user account, you must provide the data necessary to set an account:

- E-mail address,
- business name, as well as name and surname – in the case of an entrepreneur who is a natural person,
- business name, as well as name, surname and function of the person who will make orders on behalf of the Ordering Party – in the case of an entrepreneur who is not a natural person,
- a permanent place of business.

**2.** Providing the above data is voluntary, but necessary to create an account.

**3.** As part of editing your account details, you can enter your further data, in particular data that can be used when placing orders, such as tax identification number or phone number.

**4.** The system used to handle user accounts records your IP number, which you used when registering your user account.

**5.** We integrate Google Analytics with the user account mechanism. In this way, the data collected by the Google Analytics tracking code about your use of our store and website is assigned to your user account. This includes information such as:

- information about the operating system and the web browser you are using,
- subpages viewed,
- time spent on page,
- transitions between individual subpages,
- clicks on individual links,
- source from which you go to our page,
- age range you are in,
- your gender,





- your approximate location limited to the town.
- your interests based on your online activity.
- 6. We analyze such information about you in order to optimize our websites in terms of user experience, effectiveness and conversion, which is our legitimate interest referred to in art. 6 (1f) GDPR,
- 7. You can modify the information provided to us about you in connection with the registration of your user account at any time.
- 8. The data provided by you in connection with the creation of an account are processed in order to provide you with an electronic service consisting in providing you with the possibility of using the user account. This service is provided on the basis of a contract concluded on the terms described in the regulations, which means that in this respect the legal basis for the processing of your personal data is art. 6 (1b) GDPR.
- 9. The data will be stored for the duration of the user's account. You may decide to delete your account at any time, but this will not result in the deletion of information about your orders placed using your account from our database. The order data are stored in our archive throughout the entire period of the store and website operation because it allows to identify the returning customer, recreate his/her purchase history, granted discounts, etc., which is our legitimate interest referred to in art. 6 (1f) GDPR.

### **Orders - details**

1. When placing an order in the store, you must provide the data necessary to complete the order. Depending on the order details, the data may be different. For example, if you are ordering physical products, we need to know where to deliver your order. If you are asking for a VAT invoice, we need to know your NIP number and the address of your business. Providing data is voluntary, but necessary to place an order.
2. In addition, the system used to handle the ordering process may save your IP number that you used when placing the order.
3. Each order is stored in our database, which means that your personal data assigned to the order is also accompanied by information about the order, such as the products ordered, the selected payment method, the selected delivery method, the date of payment.





4. Data collected in connection with the order are processed in order to perform the contract concluded by placing an order (art. 6 (1b) GDPR), issuing an invoice (art. 6 (1c) GDPR in connection with the provisions governing the issue of invoices), including the invoice in the accounting documentation and the implementation of other tax and accounting obligations (art. 6 (1c) GDPR in connection with the provisions governing tax and accounting obligations) and for archival purposes for the possible need to defend, establish or pursue claims, as well as to identify the returning customer, which is our legitimate interest (art. 6 (1f) GDPR).
5. Data about orders will be processed for the time necessary to perform the order, and then until the expiry of the limitation period for claims under the contract. In addition, after this period, the data may still be processed by us for archival purposes for the possible need to defend, establish or pursue claims, as well as to identify the returning customer. Remember also that we are obliged to keep accounting records, which may contain your personal data, for the period required by law.

#### **Complaints and withdrawal from the contract - details**

1. If you submit a complaint or withdraw from the contract, you provide the personal data contained in the complaint or the declaration of withdrawal from the contract, which includes, among others, your name and surname, home address, telephone number, e-mail address, bank account number. Providing data is voluntary, but necessary to submit a complaint or withdraw from the contract.
2. The data provided to us in connection with the submission of a complaint or withdrawal from the contract are used to implement the complaint procedure or the procedure of withdrawal from the contract, and then for archival purposes, which is our legitimate interest (art. 6 (1f) GDPR).
3. The data will be processed for the time necessary to implement the complaint procedure or the withdrawal procedure. Complaint documents will be kept until the expiry of the warranty rights. The statements of withdrawal from the contract will be kept together with the accounting documentation for the period required by law.





### **Newsletter - details**

1. By subscribing to the newsletter, you provide your name and e-mail address. Providing data is voluntary, but necessary to subscribe to the newsletter.
2. The system used to handle the newsletter saves your IP number that you used when subscribing to the newsletter, determines your approximate location, the e-mail client you use to handle e-mail and tracks your actions taken in connection with the messages sent to you. Therefore, we also have information about the messages you opened, the messages in which you clicked on links, etc.
3. The data provided by you in connection with the subscription to the newsletter is used to send you the newsletter, and the legal basis for their processing is your consent (art. 6 (1a) GDPR) expressed when subscribing to the newsletter. As for the processing of information that does not come from you, but was collected automatically by the mailing system, we rely on our legitimate interest in this regard (art. 6 (1f) GDPR) consisting in the analysis of the behavior of newsletter subscribers in order to optimize mailing activities.
4. You can unsubscribe from the newsletter at any time by clicking on the dedicated link in each message sent as part of the newsletter or by simply contacting us. Despite unsubscribing from the newsletter, your data will still be stored in the database in order to identify the returning subscriber and the possible need to defend claims related to sending you the newsletter, in particular to prove that you gave consent to receiving the newsletter and the moment of its withdrawal, which is our legitimate interest referred to in art. 6 (1f) GDPR.
5. You can modify your data provided for the purpose of receiving the newsletter at any time by contacting us.

### **Comments and product reviews - details**

1. When adding a comment, rating or product review, you must provide at least the username that will be assigned to the comment (the name may contain personal data, such as your name or surname) and an e-mail address. Providing this data is voluntary, but necessary to add a comment, rating or opinion.
2. The data provided in connection with adding a comment, rating or opinion will be processed in order to publish the comment, rating or opinion on the website. The basis for processing is your consent (art. 6 (1a) resulting from the submission of a form for the publication of a





comment or opinion. You can withdraw your consent at any time by requesting the deletion of a comment, rating or review.

3. Comments, ratings and opinions must be approved by Grupa Weba sp. z o.o. before they can be published.
4. Your comment, rating, or review will be publicly available on the site for as long as it is available on the Internet, unless you have previously requested that the comment, rating, or review be removed.

You can also modify the content of a comment, rating or review at any time, as well as modify the data associated with it about the person who posted the comment, rating or review.

### **Correspondence handling - details**

1. By contacting us, you naturally provide us with your personal data contained in the correspondence, in particular with your e-mail address, name and surname. Providing data is voluntary, but necessary to make contact.
2. In this case, your data is processed in order to contact you, and the basis for processing is art. 6 (1f) GDPR, i.e. our legitimate interest. The legal basis for processing after the end of contact is also our legitimate interest in the form of archiving correspondence for the purpose of ensuring the possibility of proving certain facts in the future (art. 6 (1f) GDPR).
3. The content of the correspondence may be archived and we are not able to clearly determine when it will be deleted. You have the right to request a history of correspondence with us (if it was subject to archiving), as well as request its removal, unless its archiving is justified due to our overriding interests, e.g. defense against potential claims on your part.

### **Tax and accounting obligations - details**

If we issue an invoice for you, it is part of the accounting documentation, which will be kept for the period of time required by law. Your personal data is then processed in order to fulfill our tax and accounting obligations (art. 6 (1c) GDPR in connection with the relevant provisions regulating tax and accounting obligations).

### **Archive - details**

As part of the description of the individual purposes of personal data processing, which are presented above, we have indicated the dates for the storage of personal data. These terms are

9





often related to the archiving of specific data for the purpose of ensuring the possibility of proving certain facts in the future, reconstructing the course of cooperation with the client, exchanging correspondence, defense, establishing or pursuing claims. In this regard, we rely on our legitimate interest, referred to in art. 6 (1f) GDPR.

### **Own marketing - details**

1. We use an abandoned cart recovery mechanism within our store and website. If you start the ordering process but do not complete it, our system will note this fact in order to take action to get you to complete the order. These actions may include, in particular, sending you an email encouraging you to complete your order or displaying targeted advertising while browsing the Internet.
2. Our store and website may also collect information about your activity and display targeted ads to you while browsing the Internet. However, if you are not a registered user, the information used for this purpose is not personal data. It is only when they are cross-referenced with your personal data collected in your account that they become personal data.
3. We carry out the above-mentioned activities based on our legitimate interest referred to in art. 6 (1f) GDPR consisting in marketing own products.

### **Analysis, statistics, optimization - details**

1. We collect statistical information about the behavior of users when browsing our websites, such as clicks on links, transitions between subpages, time spent on individual pages, etc. We analyze this information in order to optimize our sites in terms of user experience, efficiency and conversion.

In most cases, the information processed in this way is not personal. The exception is when you are a registered user. We may then combine this information with other information about you that is stored in your account.

2. We carry out the above-mentioned activities based on our legitimate interest referred to in art. 6 (1f) GDPR, consisting in optimizing our websites.





#### **# 6: How long will we keep your personal data?**

The data storage periods have been indicated separately for each processing purpose. You will find this information under the details for each separate processing purpose.

#### **# 7: Who are the recipients of your personal data?**

1. Third party service providers are also involved in the processing of your personal data, namely:

- hosting provider that stores the data on the server,
  - provider of cloud computing service in which backups that may contain your personal data are stored,
  - provider of the mailing system in which your data is stored, if you are a newsletter subscriber,
  - provider of CRM system in which we store your data in order to improve the customer service process and for archival purposes,
  - provider of the invoicing system in which your data is stored for the purpose of issuing an invoice,
  - accounting office that processes your data visible on invoices,
  - courier companies that process your data to the extent necessary to deliver your order,
  - law firm that gains access to data if necessary to provide legal assistance to us,
  - entity providing maintenance services that gains access to data, if the technical works carried out relate to areas in which personal data are located,
  - other subcontractors who gain access to data, if the scope of their activities requires such access.
2. Your personal data may also be transferred to tax authorities to the extent necessary for the performance of tax and accounting duties. It concerns in particular all declarations, reports, statements and other accounting documents in which your personal data is located.
3. In addition, if necessary, your personal data may be made available to entities, bodies or institutions authorized to obtain access to data on the basis of legal provisions, such as the police, security services, courts, public prosecutor's offices.
4. Moreover, we use tools that collect a lot of information about you related to the use of our store and website. It concerns, in particular, the following information:
- information about the operating system and the web browser you are using,
  - subpages viewed,
  - time spent on page,
  - transitions between individual subpages,





- clicks on individual links,
- source from which you go to our page,
- age range you are in,
- your gender,
- your approximate location limited to the town,
- your interests based on your online activity.

This information in itself does not, in our opinion, have the character of personal data. As this information is collected by the third party tools we use, this information is also processed by the tool providers pursuant to their terms of use and privacy policies. Generally, this information is used to provide and improve services, manage them, develop new services, measure the effectiveness of advertisements, protect against fraud and abuse, as well as personalize the content and advertisements displayed on individual websites, sites and applications. We have attempted to provide the details of this process later in this policy, as part of the tool-specific explanations.

#### **# 8: Do we transfer your data to third countries or international organizations?**

1. Yes, part of the processing of your personal data may involve their transfer to third countries.
2. We transfer your personal data to third countries in connection with the use of tools that store personal data on servers located in third countries, in particular in the USA. The providers of these tools guarantee an adequate level of protection of personal data through appropriate compliance mechanisms provided for by the GDPR, in particular through the use of standard contractual clauses.
3. The storage of personal data on servers located in third countries takes place as part of Google's G-Suite service, provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland - in the scope of all data processed as part of Google's services, including those contained in files synchronized with Google Drive.
4. Providers listed in point 3 above ensure an adequate level of protection of personal data through the use of compliance mechanisms provided for by the GDPR, in particular through the use of standard contractual clauses.
5. We also remind you here that we use external tools that may collect anonymous information about you. We have mentioned this on several occasions under this policy, including in





response to a previous question. The providers of these tools often use servers located all over the world, in particular in the United States of America (USA), to store the information they collect.

**# 9: Do we use profiling? Do we make automated decisions based on your personal data?**

1. We do not make decisions for you based solely on automated processing, including profiling, which would have legal effects on you or similarly significantly affect you.
2. Yes, we use tools that can take specific actions depending on the information collected as part of the tracking mechanisms, but we believe that these actions do not have a significant impact on you, because they do not differentiate your situation as a customer, do not affect the terms of any contract you may enter into with us, etc.
3. We emphasize that the tools we use do not give us access to information that would allow us to identify you.
4. We do not cross-reference the information indicated above with your personal information that is in our databases. This information is anonymous and does not allow us to identify you. This information is stored on the servers of the providers of each tool, and these servers may be located around the world.

**# 10: What rights do you have in relation to the processing of your personal data?**

1. The GDPR grants you the following potential rights related to the processing of your personal data:
  - the right to access your data and receive a copy of it,
  - the right to rectify (correct) your data,
  - the right to delete data (if in your opinion there are no grounds for us to process your data, you can request that we delete it),
  - the right to limit data processing (you can request that we limit the processing of data only to their storage or performance of activities agreed with you, if, in your opinion, we have incorrect data or we process it unjustifiably),
  - the right to object to the processing of data (you have the right to object to the processing of data on the basis of a legitimate interest; you should indicate a specific situation that, in your opinion, justifies the termination of the processing covered by the objection; we will stop processing your





- data for these purposes, unless we prove that the grounds for data processing by us override your rights or that your data is necessary for us to establish, assert or defend claims),
- the right to transfer data (you have the right to receive from us, in a structured, commonly used, machine-readable format, personal data that you provided to us on the basis of a contract or your consent; you can commission us to send this data directly to another entity),
  - the right to withdraw consent to the processing of personal data, if you have previously given such consent,
  - the right to lodge a complaint with the supervisory body (if you find that we are processing data unlawfully, you can file a complaint with the President of the Office for Personal Data Protection or another competent supervisory authority).
2. The rules related to the implementation of the above-mentioned rights are described in detail in Art. 16 - 21 GDPR.
  3. You can also always ask us to provide you with information about what data we have about you and for what purposes we process it. All you need to do is send a message [products@weba.com.pl](mailto:products@weba.com.pl). However, we have made every effort to ensure that the information you are interested in is comprehensively presented in this privacy policy. You can also use the e-mail address provided above if you have any questions related to the processing of your personal data.

#### **# 11: Do we use cookies and what are they exactly?**

1. Our store and website, like almost all other websites, use cookies.
2. Cookies are small text information stored on your end device (e.g. computer, tablet, smartphone) that can be read by our ICT system (own cookies) or ICT systems of third parties (third party cookies). In cookies, specific information can be saved and stored, to which ICT systems can then access for specific purposes.
3. Some of the cookies we use are deleted after the end of the web browser session, i.e. after closing it (so-called session cookies). Other cookies are stored on your device and enable us to recognize your browser the next time you access the site (permanent cookies).





#### **# 12: On what basis do we use cookies?**

1. We use cookies on the basis of your consent, except when cookies are necessary for the proper provision of electronic services to you.
2. Cookies that are not necessary for the proper provision of electronic services remain blocked until you consent to the use of cookies. During your first visit to the website, we display a message asking for your consent along with the possibility of managing cookies, i.e. deciding which cookies you agree to and which you want to block.
3. Remember that disabling or limiting the use of cookies may prevent you from using some of the functions available in the store and on the website and cause difficulties in using the store and website, as well as many other websites that use cookies. For example, if you block cookies from social plug-ins, buttons, widgets and social functions implemented in the store may not be available to you.

#### **# 13: Can you disable cookies?**

1. Yes, you can manage cookie settings within your web browser. You can block all or selected cookies. You can also block cookies from specific websites. You can also delete previously saved cookies and other website and plug-in data at any time.
2. Remember that disabling or limiting the use of cookies may prevent you from using some of the functions available in the store and on the website and cause difficulties in using the store and website, as well as many other websites that use cookies. For example, if you block cookies from social plug-ins, buttons, widgets and social functions implemented in the store may not be available to you.

#### **# 14: For what purposes do we use our own cookies?**

1. Own cookies are used to ensure the proper functioning of individual mechanisms of the store and website, such as maintaining a session after logging into the account, remembering recently viewed products and products added to the cart.
2. Own cookies also store information about the cookie settings defined by you, made from the level of the cookie management mechanism.
3. Own cookies are also used to support the mechanism of recovering abandoned carts.





#### **# 15: What third party cookies are used?**

The following third party cookies are used in the store and on the website:

- Google Analytics,
- Google Tag Manager,
- Google AdWords,
- Google AdSense,
- GetResponse.

#### **# 16: Do we track your behavior on our website and store?**

Yes, we use Google Analytics, Google AdWords, Google Tag Manager, Google AdSense and GetResponse to collect information about your activity in the store and on the website.

#### **# 17: Are we targeting you with targeted ads?**

Yes, we use Facebook Ads and Google Ads, in which we can target specific target groups defined on the basis of various criteria such as age, gender, interests, profession, job, activities previously undertaken in our store. These tools are described in detail under the question on third-party cookies, so we will not repeat that information here.

#### **# 18: How can you manage your privacy?**

Below you will find a list of options for managing your privacy.

- cookie settings in the web browser,
- browser plugins supporting the management of cookies, e.g. Ghostery,
- additional cookie management software,
- incognito mode in a web browser,
- behavioral advertising settings, e.g. youronlinechoices.com,
- Google Analytics Opt-out: <https://tools.google.com/dlpage/gaoptout>,
- Google Ads Settings: <https://adssettings.google.com/>,
- Facebook Ads Settings: <https://www.facebook.com/ads/settings>,

#### **# 19: What are server logs?**

1. Using the Website is associated with sending queries to the server on which the website is stored. Each query directed to the server is saved in the server's logs.





2. Logs include your IP address, server date and time, information about the web browser and the operating system you are using. Logs are saved and stored on the server.
3. The data saved in the server logs are not associated with specific individuals using the website and are not used by us to identify you.
4. Server logs are only auxiliary material used to administer the website, and their content is not disclosed to anyone except persons authorized to administer the server.

