



PERSONAL DATA PROTECTION POLICY OF THE OCHNIK CUSTOMER CLUB

This Personal Data Protection Policy of the OCHNIK Customer Club, hereinafter referred to as the "Policy," aims to provide you with detailed information about what personal data we collect as part of the OCHNIK Customer Club, for what purposes and how we use them, who we are, and what rights you have. It serves to convey information referred to in Article 13 of the Regulation of the European Parliament and of the Council (EU) 2016/679 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 referred to as "GDPR," which has been in force since 25 May 2018. The information provided below is very important, so please take the time to carefully read their content.

1. PERSONAL DATA ADMINISTRATOR - CONTACT:

We inform you that the administrator of your personal data is **OCHNIK S.A.** located in the Garwolin, address: 8B Stacyjna Street, 08-400 Garwolin, Poland registered in the business registry maintained by the District Court for m.st. Warsaw in Warsaw, XIV Economic Department of the National Court Register under KRS number 0000604045, NIP 826-000-07-80, REGON: 005176399, with a share capital of PLN 8,090,500 (hereinafter "We").

You can contact us:

- by mail at the address: OCHNIK S.A., 8B Stacyjna Street, 08-400 Garwolin, Poland;
- by email at: klubklienta@ochnik.com

DATA PROTECTION OFFICER AND HIS CONTACT DETAILS:

2. We have appointed a Data Protection Officer whom you can contact with any questions or requests in all matters concerning personal data. You can do this:

- by mail at the address: OCHNIK S.A. Data Protection Officer, 8B Stacyjna Street, 08-400 Garwolin, Poland;
- by email at: inspektorochronydanych@ochnik.com

WHAT PERSONAL DATA DO WE PROCESS AS PART OF THE OCHNIK CUSTOMER CLUB?

3. In connection with joining the OCHNIK Customer Club, we may ask you to provide the following personal data:

- first and last name;
- place of residence;
- contact details in the form of an email address or phone number.

In connection with the activities of the OCHNIK Customer Club, for the purpose of granting you a discount and for marketing purposes, including profiling and automatic data processing, we also collect:

- data related to your activities within the OCHNIK Customer Club, i.e., so-called behavioral data regarding your behaviors, including information about your purchases, their number, subject, frequency, and place, as well as the history of marketing correspondence addressed to you (e.g., newsletter, SMS, MMS, email).

FOR WHAT PURPOSE DO WE ACQUIRE YOUR DATA AND ON WHAT BASIS DO WE USE IT, AND FOR HOW LONG?

4. Your personal data is needed and processed by us for the purpose of:

- conducting and implementing the OCHNIK Customer Club loyalty program based on your consent, under Article 6(1)(a) GDPR, which includes:
 - (i) receiving a discount resulting from membership in the OCHNIK Customer Club;



- (ii) recognizing and handling your complaints regarding the OCHNIK Customer Club program, including responding to them;
- (iii) marketing, including profiling, which includes providing you with information about promotions and products, including services available in OCHNIK OCHNIK s, events, or actions organized by us, including offers specially selected for you (including those available only to members of the OCHNIK Customer Club) through, for example, traditional mail, email, newsletter, phone contact, SMS, MMS;
- realizing our so-called legitimate interests based on Article 6(1)(f) GDPR, which include:
 - (i) establishing, defending, pursuing claims related to your membership in the OCHNIK Customer Club (including your claims related to the discount) or the activities of the OCHNIK Customer Club;
 - (ii) creating summaries, analyses, and statistics for our internal needs, including reporting, market research, planning the development of the product range or our network of OCHNIK s, development work in our IT systems;
 - (iii) ensuring network and information security;
 - (iv) supporting customer service, including adapting it to the needs arising from transactions, complaints, customer complaints, requests.

DO YOU HAVE TO PROVIDE US WITH YOUR DATA?

5. Remember that providing your personal data is entirely VOLUNTARY. You may, but do not have to provide it to us. Providing it is not a legal obligation. You are not required to provide us with any data, and providing it can only occur with your consent and at your discretion. Not providing your personal data will not have any negative consequences, except for the lack of ability to:
- receive a discount resulting from membership in the OCHNIK Customer Club;
 - receive information about our promotions, products, including services, events, actions, and offers prepared for you (including those available only to members of the OCHNIK Customer Club) through, for example, traditional mail, phone contact, SMS, MMS, email;
 - exercise other rights resulting from membership in the OCHNIK Customer Club, e.g., complaints.

TO WHOM CAN WE TRANSFER YOUR DATA?

6. We may transfer your data to:
- our employees and collaborators who need access to the data to fulfill our obligations resulting from the OCHNIK Customer Club;
 - entities processing your personal data on our behalf and participating in the execution of our activities, i.e.:
 - (i) our subcontractors supporting us in running and executing the OCHNIK Customer Club, e.g., in handling correspondence or in the customer service process, or running OCHNIK sales OCHNIK s;
 - (ii) advertising agencies and other entities intermediating in the sale of our products or organizing marketing campaigns;
 - (iii) entities operating our IT systems or providing us with IT tools;
 - (iv) entities providing us with advisory, consultancy, audit, or legal, tax, and accounting assistance;
 - (v) research agencies acting on our behalf;
 - other administrators being:
 - (i) advertising agencies and entities cooperating in organizing marketing campaigns or in running and servicing the OCHNIK Customer Club, including running OCHNIK sales OCHNIK s – to settle due remunerations;
 - (ii) entities conducting postal or courier activities.

HOW LONG CAN WE OCHNIK YOUR DATA?

7. We may store your data for the duration of your participation in the STORE Customer Club (i.e., until you resign from the STORE Customer Club, are excluded from the Club, or the STORE Customer Club program ends). After the specified period, we may store your personal data for the time during which you can pursue claims related to participation in the STORE Customer Club (e.g., related to a discount) or the activities of the STORE Customer Club, i.e., until the expiration of these claims – up to a maximum of 10 years from the moment of cessation of membership in the Club or issuance of a final court decision regarding these claims.

WHAT DOES AUTOMATED DECISION-MAKING INVOLVE?

8. Based on your consent, we may use your data for automated decision-making, including profiling, to grant you discounts and prepare special offers for you (including those available only to members of the OCHNIK Customer Club). These decisions will be made automatically based on criteria such as gender, OCHNIK addresses where purchases were made, the number and frequency of purchases, and the number and type of goods purchased.
Once the criteria are met, the IT system will automatically send you information about the granted benefit, e.g., a discount or a special offer.
You can take advantage of the granted benefit under the conditions specified in the information about its granting, you can decline it, and you can also appeal against the decision.

WHAT RIGHTS DO YOU HAVE?

9. Remember that you have the following rights related to our processing of your data:
 - the right to access your personal data, including the right to information about your personal data and to obtain a copy of the personal data;
 - the right to rectify personal data if they are incorrect and the right to have incomplete data completed;
 - the right to erase personal data;
 - the right to restrict the processing of personal data;
 - the right to data portability;
 - the right to lodge a complaint with a data protection authority, i.e., the President of the Office for Personal Data Protection, in the event of unlawful processing of your personal data;
 - **the right to withdraw consent at any time without giving reasons and without affecting the processing carried out on the basis of consent before its withdrawal;**
 - **the RIGHT TO OBJECT against:**
 - (i) **our processing of your data for marketing purposes, including against so-called profiling** (i.e., objection against sending you information about our promotions, offers, products, including services, actions, and events, including special offers), after which we will no longer be allowed to process your data for marketing purposes;
 - (ii) **our processing of your personal data for purposes resulting from so-called legitimate interests pursued by us - for reasons related to your particular situation.**
10. You can exercise your rights listed in point 9 above at any time by submitting an appropriate request.
11. You can submit requests referred to in point 9 above to us by sending a written statement:
 - to an employee of the OCHNIK Store ,
 - by email, to: klubklienta@ochnik.com
 - by mail, to the address: OCHNIK. S.A. 8B Stacyjna Street, 08-400 Garwolin, Poland.
12. We are obliged to inform you about the actions taken in connection with the requests referred to in point 9 above without undue delay, and in any case within one month of receiving the request. If necessary, the period referred to in the previous sentence may be extended by another two months due to the complex nature of the request or the number of requests. However, within one month of receiving your request, we must inform you of the extension of the deadline, stating the reasons. If we do not take action in connection with your requests referred to in point 9 above, we will inform you without delay – at the latest within one month of receiving the request – of the reasons for not taking

action and the possibility of lodging a complaint with the President of the Office for Personal Data Protection and seeking judicial remedies.

13. We are obliged to inform you about the actions taken in connection with the requests referred to in point 9 above without undue delay, and in any case within one month of receiving the request. If necessary, the period referred to in the previous sentence may be extended by another two months due to the complex nature of the request or the number of requests. However, within one month of receiving your request, we must inform you of the extension of the deadline, stating the reasons.
14. If we have reasonable doubts regarding your identity in connection with the submission of a request, we may ask you to provide additional information necessary to confirm your identity.
15. We will provide you with the information referred to in points 12.-14. above, in writing, at our discretion:
 - by registered mail to the address provided by the Participant, or
 - by electronic means to the email address provided by the Participant, except in cases where:
 - (i) you submit your request electronically and do not request information in another form - in this case, we will provide the information to your specified email address;
 - (ii) you request to receive information orally and your identity is otherwise confirmed by us - in this case, we will provide the information orally.
16. All communication and actions taken by us in connection with your requests referred to in point 9 above are free of charge. However, if your requests are clearly unfounded or excessive, for example, due to their repetitive nature, we may:
 - charge a reasonable fee taking into account the administrative costs of providing information, communication, or taking the requested actions, or,
 - refuse to act on the request.
17. We will inform every recipient to whom your personal data has been disclosed about the rectification, completion, deletion, or restriction of processing of your personal data that we have carried out at your request. We will not need to pass on such information only when it proves impossible (e.g., the company has been dissolved) or would require a disproportionately large effort (data was disclosed many years ago and it has not been possible to contact the recipient despite attempts).
18. Upon your request, we will inform you of the recipients to whom we have communicated information about the rectification, deletion, or restriction of processing of your personal data, as well as the recipients we were unable to notify.

HOW CAN YOU OBTAIN ADDITIONAL INFORMATION?

19. To obtain additional information regarding this Policy and issues concerning the principles of processing and protecting your personal data by us, you can contact us:
 - in the manner indicated in point 1, i.e.:
 - (i) by mail to the address: OCHNIK S.A., ul. Stacyjna 8B, 08-400 Garwolin;
 - (ii) by email to: klubklienta@ochnik.com
 - by addressing questions to the Data Protection Inspector in the manner indicated in point 2, i.e.:
 - (i) by mail to the address: OCHNIK S.A. Data Protection Inspector, ul. Stacyjna 8B, 08- 400 Garwolin;
 - (ii) by email to: inspektorochronydanych@ochnik.com