

PERSONAL DATA PROTECTION POLICY OF OCHNIK STATIONARY STORES

This Personal Data Protection Policy of OCHNIK stationary Stores, hereinafter referred to as the "Policy," aims to provide information about what personal data we collect from Customers of our OCHNIK stationary Stores outside of the OCHNIK Customer Club, for what purposes, and how we use them.

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: rodo@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 OF STATIONARY STORE CUSTOMERS DO WE PROCESS?

3. We process your personal data that you provide to us when placing a service order in our stationary store or contacting us to take action before entering into a contract (e.g., informing you about the availability of the product you are interested in) or when submitting a complaint or withdrawing from a contract.

We also collect your data for the purpose of issuing a VAT invoice if the sale is related to your business activity or if you request an invoice. If you pay us through a bank or payment institution, we will obtain information about the account number from which the payment was made.

Additionally, we may collect your behavioral data related to your transactions or correspondence history with you, information about your activities on our website, including the online store, such as viewed products, IP addresses, device identifiers, cookie data, and locations.

We may combine this data with other data we hold and process, primarily for the purpose of creating summaries, analyses, and statistics for internal needs, customer service support, and marketing purposes.

To pursue claims, we may also collect your PESEL number or address from publicly available sources, including CEIDG, KRS, REGON, or other registers and records maintained by public administration authorities.

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 necessary for us and is processed by us for the purpose of:

- taking actions at your request before concluding a contract (e.g., making a valuation or notifying about product availability) – Article 6(1)(b) GDPR
 - for the time necessary to perform these actions;
- concluding and executing the contract – Article 6(1)(b) GDPR
 - for the time necessary to perform the contract and make settlements under it;
- fulfilling the legal obligations incumbent on us – legal basis Article 6(1)(c) GDPR including, among others:
 - (i) obligations under the warranty for defects
 - for the period of liability under warranty;

- (ii) obligations related to withdrawal or termination of the contract
 - for the time of performing obligations under these titles;
- (iii) obligations related to the issuance and storage of invoices and documents required by tax law and accounting regulations
 - until the issuance of the invoice or other documents and then for the period of their storage specified by tax and accounting regulations;
- (iv) storing data to demonstrate the fulfillment of the accountability obligation and other arising from data protection regulations
 - for the period of liability under this title;
- realization of our so-called legitimate interests – legal basis Article 6(1)(f) GDPR - occurring in case of:
 - (i) establishing, defending, pursuing claims
 - until the limitation of claims under the contract or our actions related to the contract or requests before its conclusion (maximum 10 years from the execution of the contract or requests before its conclusion or issuance of a final court decision);
 - (ii) creating compilations, analyses, and statistics for our internal needs including, in particular, reporting, research, and planning the development of our products, including services, and improving their quality, development work in our IT systems
 - for the period of activities before concluding a contract and until the execution of the contract, and then no later than the limitation of claims under this contract or our actions related to the contract or requests before its conclusion;
 - (iii) ensuring network and information security
 - for the entire period of data storage, i.e., until the limitation of claims under the contract or our actions related to the contract or requests before its conclusion and the cessation of our liability under the accountability obligation and other imposed by data protection regulations;
 - (iv) supporting customer service including by adjusting it to the needs arising from the orders made, complaints, grievances, requests – for the duration of the contract or until the completion of actions taken at the request before the conclusion of the contract;
 - (v) for marketing purposes including profiling, i.e., to convey information about our promotions, products including services, events, campaigns including special offers – for the duration of the contract until its execution;
 - (vi) protection against fraud attempts – for the duration of proceedings on the subject.

We may also process your data based on:

- the consent given to us for the purposes specified therein (including, for example, based on consent to the processing of your data after the execution of the contract or before its conclusion for marketing purposes including profiling)
 - until the withdrawal of consent and after withdrawing consent
 - until the limitation of claims under our actions taken on its basis and cessation of our liability under the accountability obligation and other imposed by data protection regulations for the purpose of establishing, defending, or pursuing these claims, creating compilations, analyses, and statistics for our internal needs, ensuring network and information security (i.e., for the realization of our so-called legitimate interests – Article 6(1)(f) GDPR) and demonstrating the fulfillment of the accountability obligation and others imposed by data protection regulations (i.e., for the realization of a legal obligation – Article 6(1)(c) GDPR).

DO YOU HAVE TO PROVIDE US WITH YOUR PERSONAL 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, but it may be a contractual obligation.

To enter into a sales contract for goods in the OCHNIK stationary store, you do not need to provide us with any of your data unless you purchase it in connection with your business activity or request that we issue a VAT invoice related to the sale.

The data indicated in the forms of these documents, which are not optional, are necessary for entering into and performing contracts related to your service orders, as well as for handling, recognizing, and processing your complaints.

Your data may also be necessary for handling matters you address to us before entering into a contract with us or after its termination.

However, not providing your personal data will not result in any negative consequences for you, except for the inability to, for example:

- issue an invoice for sales or orders made for you;
- handle and fulfill your orders placed with us;
- handle, recognize, and process your complaints or withdrawal statements from the contract and obligations arising from these titles;
- handle matters you address to us before entering into a contract or after its termination;
- in the case of optional data - the inability to contact you by phone or email or to refund payments to a bank account.

WHO CAN WE TRANSFER YOUR DATA TO?

6. We may transfer your data to the following recipients:

- our employees and collaborators who must have access to the data to be able to fulfill our obligations or actions on your behalf;
- entities processing your personal data on our behalf and participating in the performance of our activities, including:
 - (i) our subcontractors supporting us in the execution of contracts, including orders and customer service, e.g., handling correspondence or the customer service process, including the realization of deliveries or returns, or managing our sales stores or other entities mediating in the sale of our products and services, as well as experts acting on our behalf;
 - (ii) advertising agencies or other entities conducting or organizing or cooperating or mediating in the conduct or organization of our marketing actions, including advertising campaigns;
 - (iii) entities operating our IT systems or providing us with IT tools, including IT platforms or places on servers or websites;
 - (iv) entities providing us with advisory, consultancy, audit, or legal, tax, accounting assistance;
 - (v) research agencies acting on our behalf;
 - (vi) entities providing us with services related to the security of persons and property;
- other administrators being:
 - (i) advertising agencies or entities conducting or organizing or cooperating or mediating in the conduct or organization of our marketing actions (including advertising campaigns) or in customer service, including running sales stores or other entities mediating in the sale of our products or services – for the purpose of settling due remunerations;
 - (ii) entities conducting the transport of goods shipments or freight services – for the purpose of delivering goods shipments;
 - (iii) entities conducting postal or courier activities – for the purpose of delivering correspondence or shipments;
 - (iv) insurance companies - for the purpose of insuring goods shipments;
 - (v) entities conducting payment activities (banks, payment institutions) – for the purpose of making refunds or ensuring the operation of the payment order service;
 - (vi) entities conducting credit activities (banks) – for the purpose of providing credit for the purchase of our products and making refunds;
 - (vii) entities acquiring receivables – in case of non-payment of the price for the purchased goods or remuneration for the execution of the order on time or other receivables on our behalf.

WHAT DOES AUTOMATED DECISION-MAKING INVOLVE?

7. During the term of the contract until its execution and after its execution or before its conclusion - based on your separate consent, we may use your data for automated decision-making, including profiling, to prepare special offers for you.

These decisions will be made automatically based on criteria such as gender, 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 with a special offer.

You can take advantage of the offer on the terms specified in the information about it, decline it, and also appeal against the decision.

WHAT RIGHTS DO YOU HAVE?

8. 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.**

9. You can exercise your rights listed in point 8 above at any time by submitting an appropriate request.

10. You can submit requests referred to in point 8 above to us by sending a written statement:

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

11. We are obliged to provide you with information about the actions taken in connection with your requests without undue delay and in any event within one month of receiving the request.

If necessary, the term referred to in the preceding sentence may be extended by another two months due to the complex nature of the request or the number of requests.

Within one month of receiving your request, we must inform you of such an extension of the term, stating the reasons for it.

12. If we do not take action in response to your requests, 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 of seeking legal remedies before the Court.

13. If we have legitimate doubts regarding your identity in connection with a request, we may ask you for additional information necessary to confirm it.

14. We will provide you with the information referred to in points 10-12 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.

15. All communication and actions taken by us in connection with your requests 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.
16. 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).
17. 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?

18. To obtain additional information regarding the principles of processing and protection of your personal data by us, please consult our Privacy Policy ([link](#)). You can also contact us:
 - in writing, at the address: OCHNIK. S.A. 8B Stacyjna Street, 08-400 Garwolin, Poland;
 - by email, at: rodo@ochnik.com
 - by addressing questions to the Data Protection Inspector:
 - (i) in writing, at the address: OCHNIK. S.A. Data Protection Inspector, 8B Stacyjna Street, 08-400 Garwolin, Poland;
 - (ii) by email, at: inspektorochronydanych@ochnik.com
19. If you are also a member of the OCHNIK Customer Club, detailed matters related to the processing of data collected in connection with joining it are specified in the Privacy Policy of the OCHNIK Customer Club.
20. If you are also a client of OCHNIK stationary salons, detailed matters related to the processing of data collected in connection with transactions made there are specified in a separate Privacy Policy for customers of OCHNIK salons.
21. If you are a B2B client, matters related to the processing of your personal data are specified in the Privacy Policy for B2B Clients.