

WOODECO PRIVACY POLICY

("Privacy Policy")

In order to safeguard the security of your personal data, and pursuant to Articles 13 and 14(1) and (2) of 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) (OJ EU L 119 of 2016, p. 1, as amended), hereinafter referred to as the "**GDPR**", we hereby present information and principles concerning the processing of your personal data by Woodeco Spółka z ograniczoną odpowiedzialnością, with its registered office in Wrocław.

§ 1 [PERSONAL DATA CONTROLLER]

1. The Controller of your personal data is Woodeco Spółka z ograniczoną odpowiedzialnością, with its registered office in Wrocław, at ul. Strzegomska 42AB, 53-611 Wrocław, entered into the Register of Entrepreneurs of the National Court Register by the District Court for Wrocław-Fabryczna in Wrocław, 6th Commercial Division of the National Court Register, under KRS number: 0000247423, NIP: 719-150-39-73, REGON: 200052769, hereinafter referred to as the "**Controller**" or interchangeably as "**Woodeco**".
2. For matters related to the processing of personal data (hereinafter referred to as: "**PD**"), you may obtain information at the address: **Woodeco Sp. z o.o.**, ul. Strzegomska 42 AB, 53-611 Wrocław, or by email: rodo@woodeco.eu.
3. The Controller processes personal data of natural persons (consumers), data related to natural persons conducting business or professional activities in their own name, as well as data of natural persons representing legal entities or organizational units that are not legal persons, but are granted legal capacity by law and conduct business or professional activities in their own name, hereinafter referred to as "**Clients**" or interchangeably as "**Users**."

§ 2 [PRINCIPLES OF PERSONAL DATA PROCESSING]

1. When processing personal data, the Controller adheres to the following principles of personal data protection:
 - a) **Principle of lawfulness, fairness, and transparency** – personal data is processed by the Controller in accordance with the law, fairly, and in a transparent manner for the data subject;
 - b) **Principle of purpose limitation** – data is collected by the Controller in a manner consistent with the purposes for which it is processed;
 - c) **Principle of data minimization** – the Controller processes only the amount of data that is adequate, relevant, and limited to what is necessary for the purposes for which it is processed;
 - d) **Principle of accuracy** – the Controller processes only accurate and, where necessary, updated data. The Controller takes all reasonable steps to ensure that personal data which is inaccurate in relation to the purposes for which it is processed is promptly erased or rectified;
 - e) **Principle of storage limitation** – the Controller retains personal data in a form that permits identification of the data subject for no longer than is necessary for the purposes for which the data is processed. The Controller may retain personal data for a longer period provided it is stored for statistical purposes. The Controller will also implement appropriate technical and

organizational measures to protect the rights and freedoms of individuals whose data is being processed;

- f) **Principle of integrity and confidentiality** – the Controller processes data in a manner that ensures appropriate security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction, or damage, using appropriate technical or organizational measures;
 - g) **Principle of accountability** – the Controller is responsible for ensuring compliance with all the principles mentioned in points a) to f) above regarding personal data processing and is able to demonstrate compliance with them.
2. The Controller implements appropriate technical and organizational measures to ensure the highest level of security for the personal data it processes, in accordance with the principles outlined above.

**§ 3 [PURPOSE OF PROCESSING PERSONAL DATA,
LEGAL BASIS, AND RETENTION PERIOD]**

Purpose of Personal Data Processing	Legal Basis for Processing Personal Data	Retention Period
<p>Creation and registration of an individual account by the client for the purpose of online sales/use of functionalities available on the platform</p>	<p>Article 6(1)(a) GDPR – consent of the data subject (client), expressed by voluntarily creating a client or user account</p> <p>Article 6(1)(b) and (c) GDPR – necessary for the conclusion and performance of a contract and compliance with legal obligations</p>	<p>Until the withdrawal of consent to the processing of personal data</p> <p>Until the expiration of any legal claims, generally 3 years, and a maximum of 6 years (limitation period set by the Civil Code)</p>
<p>Conclusion and execution of sales and delivery contracts with clients/contractors of Woodeco (in the case of natural persons)</p>	<p>Article 6(1)(b) GDPR – sales or delivery contract concluded between the client and Woodeco</p>	<p>For the duration of the contract and after its termination until the expiry of claims arising therefrom, generally 3 years, a maximum of 6 years. The limitation period is set out in the Civil Code.</p>

	<p>Article 6(1)(c) GDPR – in accordance with the provisions of the Civil Code</p>	<p>If the applicable limitation periods for pursuing claims are shorter than the retention periods for accounting documents required for tax purposes, such documents will be stored for the period necessary for tax and accounting purposes, i.e., for 5 years from the end of the year in which the tax obligation arose.</p>
<p>Processing data of co-workers or employees of clients or contractors of Woodeco for the proper execution of sales and delivery contracts (for contractors being legal entities or entrepreneurs)</p>	<p>Article 6(1)(f) GDPR – legitimate interest of the Controller, which is the proper performance of the contract and communication with the contractor</p>	<p>For the duration of the contract and after its termination, until the expiration of claims resulting from it, generally 3 years, maximum 6 years, as per the Civil Code.</p>
<p>Handling complaints submitted by clients (under warranty and guarantee)</p>	<p>Article 6(1)(b) GDPR – contract of sale or delivery concluded between the client and Woodeco</p> <p>Article 6(1)(c) GDPR – in compliance with applicable legal provisions, including the Civil Code</p>	<p>Documentation related to the handling of a client's complaint will be retained for one year after the expiration of the warranty period or the settlement of the complaint, as defined in the Civil Code.</p>
<p>Conducting marketing activities for potential and current clients (without the use of electronic communication means)</p>	<p>Article 6(1)(f) GDPR – legitimate interest of the Controller, which is conducting marketing campaigns aimed at clients</p>	<p>Until the client objects to the processing of their data for marketing purposes.</p>
<p>Conducting marketing activities for potential and current clients (with the use of electronic communication means)</p>	<p>Article 6(1)(a) GDPR – consent of the data subject</p> <p>The legal basis for processing is the consent of the data subjects, in accordance with the provisions of the Telecommunications Law and the Act on Electronic Services.</p>	<p>Until consent is withdrawn or the individual informs the Controller in any manner of their wish to stop receiving communications about the Controller's activities via email or phone.</p>
<p>Pursuing claims by the Controller or defending against legal claims directed at the Controller</p>	<p>Article 6(1)(f) GDPR – based on the legitimate interest of the Controller, with the purpose of securing and defending against claims.</p>	<p>Data will be retained for the duration of legal proceedings concerning the pursued claims, until their final resolution, and in the case of enforcement proceedings, until the full satisfaction of the pursued claims..</p>

Storage of documents containing personal data (contracts, invoices) for accounting purposes	Article 6(1)(c) GDPR – in compliance with applicable tax law provisions.	These documents will be stored for the period necessary for tax and accounting purposes, i.e., for 5 years from the end of the year in which the tax obligation arose.
Subscription to the Woodeco newsletter (performance of a contract for the provision of an electronic service)	Article 6(1)(a) GDPR – consent of the data subject, voluntarily provided by checking a box on the Woodeco website.	Personal data processed in connection with the Woodeco newsletter subscription will be retained until consent is withdrawn, in the same manner in which it was granted.
Provision of personal data by clients through the use of the contact form on the website, online store platform, or Woodeco communication platform for the purpose of performing an electronic service	Article 6(1)(a) GDPR – consent of the data subject, voluntarily provided by submitting their data in the contact form.	Personal data will be processed until consent is withdrawn, in the same manner in which it was granted.
	Article 6(1)(b) GDPR – sales or delivery contract concluded between the client and Woodeco.	Personal data will be processed for the duration of the contract and, after its termination, until the expiration of the limitation period for claims arising from the contract, which is generally 3 years, but can be up to 6 years. The limitation period is set by the provisions of the Civil Code.
Establishing cooperation under civil law contracts and related activities and settlements	Article 6(1)(c) GDPR – based on the provisions of applicable law, including the Civil Code and tax law. Article 6(1)(b) GDPR – civil law contract concluded between Woodeco and the contractor.	Personal data will be processed for the duration of the contract and, after its termination, until the expiration of the limitation period for claims arising from the contract, which is generally 3 years, but can be up to 6 years. If the limitation periods for pursuing claims are shorter than the retention periods for accounting documents required for tax purposes, such documents will be retained for the period necessary for tax and accounting purposes, i.e., for 5 years from the end of the year in which the tax obligation arose.

§ 4 [TYPES AND CATEGORIES OF PROCESSED PERSONAL DATA]

1. The Controller processes the following personal data:
 - a) For the creation of a customer account in the online store or a user account on the purchasing platform or communication platform, Users provide the following personal data:
 - First name and last name,
 - Email address,
 - Address details, including city, postal code, street, house number, and apartment number,
 - Phone number,
 - NIP (Tax Identification Number) – for entrepreneurs and legal persons.

The password for accessing the Customer Account in the online store or platform is set by the user independently. The user has the right to change the password at any time.

- b) For placing an order in the online store or on the purchasing platform, Users provide the following personal data:
 - First name and last name
 - Email address,
 - Address details, including city, postal code, street, house number, and apartment number,
 - Phone number,
 - NIP (Tax Identification Number) – for entrepreneurs and legal persons,
 - Company name – for entrepreneurs and legal persons.
 - c) For subscribing to the Administrator's product newsletter, Users provide the following personal data:
 - User's email address,
 - d) When submitting data via the contact form, Users provide the following personal data:
 - First name and last name,
 - Email address,
 - Phone number,
 - Address details (optional).
2. In connection with the use of the online store platform, purchasing platform, or communication platform, the Controller may also process the following information: IP address of the User's computer or internet provider, browser type, access time, navigation data, location data, operating system type, payment transaction history, website visit history, behavioral data of the website user.

§ 5 [SOURCE OF PERSONAL DATA]

The personal data processed by the Controller is obtained from:

- 1. Directly from clients/users,
- 2. Publicly available sources, such as:
 - a) Central Registration and Information on Business (CEIDG),
 - b) National Court Register (KRS),
 - c) The Internet.

§ 6 [RECIPIENTS OF PERSONAL DATA]

- 1. The recipients of your personal data will include:
 - a) State authorities or other entities authorized by law,
 - b) Entities supporting the Controller in its business activities, especially external IT system providers supporting business operations and the functioning of the online store, purchasing platform, or communication platform. Carriers and postal operators, including Poczta Polska S.A., and couriers delivering goods on behalf of the Controller,
 - c) Providers of domains, hosting, and email services,
 - d) Banks, in the case of settlements,
 - e) Legal offices or debt collection agencies, in the event of legal proceedings or claims recovery.

2. The Controller may only entrust the processing of personal data to entities that provide sufficient guarantees of implementing appropriate technical and organizational measures, ensuring that the processing complies with GDPR and protects the rights of the data subjects.
3. The Controller applies established selection and verification procedures for entities processing data on behalf of Woodeco. These procedures are designed to ensure that the data processors provide adequate guarantees of implementing appropriate organizational and technical measures to ensure the security of personal data and compliance with the data subject's rights and other data protection obligations.

§ 7 [EXERCISE OF DATA SUBJECTS' RIGHTS]

1. Woodeco ensures that data subjects can exercise their rights by implementing procedural safeguards to protect their rights and freedoms. In accordance with Articles 12–23 GDPR, you have the following rights:
 - a) Access your data and obtain a copy,
 - b) Rectify (correct) your personal data if it is incorrect,
 - c) Restrict the processing of personal data,
 - d) Erase personal data,
 - e) Lodge a complaint with the President of the Personal Data Protection Office (address: ul. Stawki 2, 00-193 Warsaw) if you believe that the processing of your personal data violates the GDPR,
 - f) Withdraw consent if the processing of your data was based on consent,
 - g) Object to the processing of your data in the cases specified in Articles 21-22 of the GDPR.
2. **[Right of access to PD]** Based on Article 15 of the GDPR the user has the right to obtain from the Controller confirmation as to whether personal data concerning them is being processed, and, if so, the user has the right to:
 - a) Access their personal data,
 - b) Receive information about the purposes of the processing, categories of processed personal data, recipients or categories of recipients of these data, the planned period for which the data will be stored, or the criteria for determining this period (if it is not possible to determine the planned period for data processing), the rights of the user under the GDPR, and the right to lodge a complaint with the supervisory authority, the source of these data, any automated decision-making, including profiling, and safeguards in place for the transfer of the data outside the European Union;
 - c) Obtain a copy of their personal data.
3. **[Right to obtain a copy of PD]** Upon the user's request, the Controller shall provide the data subject with a copy of the personal data concerning them and note the fact of issuing the first copy of the data. The Controller implements and maintains a fee schedule for further copies of the data, where the price of the data copies is calculated based on the estimated cost of processing the request for issuing copies of the data.
4. **[Right to rectification of inaccurate PD]** The Controller shall rectify inaccurate data upon the request of the data subject. The Controller has the right to refuse to rectify the data unless the data subject reasonably demonstrates the inaccuracy of the data whose rectification they are requesting.
5. **[Right to erasure of PD]** Upon request from the data subject, the Controller shall erase personal data in the following cases:

- a) The data is no longer necessary for the purposes for which it was collected or processed for other purposes,
 - b) The data subject has withdrawn consent to the processing, and the Controller has no other legal basis for processing the data,
 - c) The data subject has effectively objected to the processing of the data,
 - d) The personal data was processed unlawfully,
 - e) The personal data must be erased to comply with a legal obligation,
 - f) The request concerns data collected from a child based on consent for the provision of information society services offered directly to the child.
6. The Controller carries out requests for data erasure in such a way as to ensure the effective exercise of this right while respecting all data protection principles, including security. The Controller has a method for verifying whether the exceptions mentioned in Article 17(3) of the GDPR apply.
 7. If the data subject to erasure has been made public by the Controller, the Controller will take reasonable steps, including technical measures, to inform other controllers and processors of the need to erase the data and restrict access to it.
 8. The Controller refuses to fulfill the right to erasure of personal data to the extent that processing is necessary:
 - a) for exercising the right to freedom of expression and information;
 - b) for compliance with a legal obligation requiring processing under Union law or the law of a Member State to which the Controller is subject, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller;
 - c) for the establishment, exercise, or defense of legal claims.
 9. **[Right to restriction of personal data processing]** The Controller restricts the processing of data at the request of the data subject when:
 - a) the data subject contests the accuracy of the personal data – for a period allowing the Controller to verify the accuracy of the data,
 - b) the processing is unlawful, and the data subject opposes the erasure of the personal data, requesting instead the restriction of its use,
 - c) the Controller no longer needs the personal data for processing purposes, but the data is required by the data subject for the establishment, exercise, or defense of legal claims,
 - d) the data subject has objected to the processing on grounds relating to their particular situation – pending verification of whether the legitimate grounds of the Controller override the grounds of the objection.
 10. During the restriction of processing, the Controller stores the data but does not process it (i.e., does not use or transfer it) without the consent of the data subject, unless it is necessary for the establishment, exercise, or defense of legal claims, or for the protection of the rights of another natural or legal person, or for important reasons of public interest.
 11. The Controller informs each recipient to whom the personal data has been disclosed of any rectification or erasure of personal data, or restriction of processing carried out in accordance with Article 16, Article 17(1), and Article 18 of the GDPR, unless this proves impossible or involves disproportionate effort. The Controller informs the data subject about those recipients if the data subject requests it.
 12. **[Right to data portability]** At the request of the data subject, the Controller provides, in a structured, commonly used, and machine-readable format, or transfers to another entity if technically feasible, the data concerning that individual which they have provided to the Controller,

processed on the basis of the individual's consent or for the conclusion or performance of a contract with them, within the Controller's IT systems.

13. **[Right to object to data processing]** The user has the right, at any time, to object—on grounds relating to their particular situation - to the processing of their personal data, including profiling, where the Controller processes their data based on a legitimate interest, such as the marketing of products and services, the sending of commercial information via electronic communication (including newsletters), or the collection of statistics on the use of functionalities, such as the online store, purchasing platform, or communication platform.
14. Opting out via email from receiving marketing communications regarding products or services will be considered an objection by the user to the processing of their personal data, including profiling, for such purposes.
15. If the user's objection is justified, and the Controller has no other legal basis for processing the personal data, the personal data to which the objection applies will be deleted and will no longer be processed for that purpose.
16. If the user exercises the rights mentioned in this paragraph, Woodeco will fulfill the request or refuse to fulfill it immediately, but no later than one month after receiving the request. However, if - due to the complexity of the request or the number of requests - Woodeco cannot fulfill the request within one month, it will fulfill the request within the following two months, informing the user in advance, within one month of receiving the request, of the intended extension and the reasons for it.
17. **[Right to lodge a complaint with the supervisory authority]** The user has the right to lodge a complaint with the President of the Personal Data Protection Office (address: ul. Stawki 2, 00-193 Warsaw), if they believe that the Controller has violated their rights regarding the protection of personal data or other rights granted under the GDPR.

§ 8 [RIGHT TO WITHDRAW CONSENT TO DATA PROCESSING IN CONNECTION WITH DIRECT MARKETING AND PROFILING]

1. If your personal data is processed based on consent, you have the right to withdraw consent at any time without affecting the lawfulness of the processing carried out on the basis of consent before its withdrawal (including, but not limited to, for the purposes of direct marketing, sending newsletters, presenting commercial information, and profiling).
2. You have the right to withdraw consent at any time, but the withdrawal of consent takes effect from the moment it is withdrawn.
3. The withdrawal of consent is made by submitting a statement of consent withdrawal, sent to the Controller's address either by postal mail or electronically, as provided in § 1 of this Woodeco Privacy Policy. Consent may also be withdrawn by unchecking the appropriate selection buttons (so-called "checkboxes") available on the websites operated by Woodeco.
4. The withdrawal of consent does not affect the processing carried out by the Controller in accordance with the law before the submission of the consent withdrawal statement.
5. Submitting a statement of consent withdrawal does not result in any negative legal consequences for the users; however, it may prevent further use of certain services or functionalities, which, by law, the Controller can only provide with the user's consent.

§ 9 [INFORMATION ON THE OBLIGATION TO PROVIDE DATA]

1. Providing data is necessary for the conclusion and settlement of contracts, as well as for the Controller's compliance with legal requirements, in the following situations:
 - a) the conclusion and performance of contracts with clients/contractors,
 - b) handling complaints submitted by clients (under warranty and guarantee) and grievances,
 - c) pursuing claims by the Controller or defending against legal claims directed at the Controller,
 - d) storing documents containing personal data (contracts, invoices) for accounting purposes.
2. In other cases (particularly for processing data for marketing purposes), providing data is voluntary. However, the Controller points out that failure to provide the data specified in the registration and account creation forms will prevent the registration and creation of a Customer Account, and in the case of placing an order without registering a Customer Account, it will prevent the submission and execution of the User's order.

§ 10 [PROFILING]

1. Woodeco may carry out profiling within the meaning of Article 4(4) of the GDPR, i.e., a form of automated processing of your personal data, consisting of the use of this data to evaluate certain personal aspects of an individual interested in Woodeco's products. In other words, Woodeco adjusts the content of its services and marketing communications addressed to users according to their preferences.
2. In connection with profiling, the Data Controller has implemented appropriate measures to safeguard the rights, freedoms, and legitimate interests of the data subject, including, at the very least, the right to obtain human intervention from the Controller, to express their point of view, and to contest the decision.
3. Decisions regarding the presentation of specific commercial offers by the Controller are based on the assessment of certain information about Woodeco's clients, including the history of your payment transactions, website visit history, location data, and user behavioral data.
4. Profiling is conducted for the Controller's marketing purposes (a legitimate interest of the Controller).
5. You have the right to object at any time to the processing of your personal data in connection with profiling for marketing purposes. The objection should be submitted to the Data Controller in writing to the postal address provided in § 1 or via email to: rodo@woodeco.eu.

§ 11 [TRANSFER OF PERSONAL DATA OUTSIDE THE EEA]

1. Your personal data may be transferred outside the European Economic Area (EEA):
 - a) subject to appropriate safeguards;
 - b) to countries such as Belarus, Russia, and Ukraine, in connection with the sale or delivery of goods by the Controller. Due to the European Commission's failure to recognize these countries as providing an adequate level of personal data protection, data transfer to these countries carries a higher risk.
2. The transfer of personal data outside the EEA is based on:
 - a) Article 46(1)(b) GDPR, which allows for the transfer of personal data to a third country or international organization only when adequate safeguards are in place, and on condition that enforceable rights and effective legal remedies are available for the data subjects;

- b) Article 49(1)(b) GDPR, which allows for the transfer of personal data when it is necessary for the performance of a contract between the data subject and the Controller; or based on
- c) Article 49(1)(c) GDPR, which allows for the transfer of personal data if it is necessary for the conclusion or performance of a contract made in the interest of the data subject.

§ 12 [COOKIES POLICY]

1. To tailor the sale of individual products to the specific needs and preferences of clients, information is collected in the form of so-called cookies. Cookies are IT data, including text files, that are stored on the user's device and are intended for use on the service's websites.
2. Cookies are used to identify the software used by the service user and to optimize the functioning and security of the service. Cookies contain data about the domain from which they originate, specify the time of storage on the user's device, and have an assigned number.
3. The entity placing cookies on the user's device and gaining access to them is the Service Administrator.
4. Our website uses two types of cookies:
 - a) *Session cookies* – temporary files stored on the user's device until logging out or leaving the website,
 - b) *Persistent cookies* – stored on the user's device for the time specified in the cookie parameters or until the user deletes them.
5. Detailed information on the possibilities and ways of handling cookies and configuring the cookie handling mechanism in the user's software is available in the user's browser settings.
6. The user has the option to limit the use of cookies; however, such limitations may affect the functionality and availability of some features on the service's websites.
7. The Administrator uses the HubSpot tool, which involves the use of additional cookies. The HubSpot tool tracks users via browser cookies, which means:
 - a) The user's activity is monitored anonymously. If the user submits their data in one of the forms, HubSpot will link the user's previous page views based on the tracking cookie.
 - b) It is possible to delete cookies, meaning the user will be treated as a new user in such a case and will be assigned a new cookie.
 - c) HubSpot will associate page views with the user if the user clicks on a link in an email that directs them to a page with HubSpot tracking code installed.

§ 13 [CHANGES TO THE PRIVACY POLICY]

1. This Privacy Policy is effective as of July 1, 2024.
2. The Controller reserves the right to make changes to the Privacy Policy, which may be influenced by developments in internet technology, changes in data protection law, or the development of our website.
3. Any changes to the Privacy Policy will be communicated in a visible and understandable manner on the websites operated by Woodeco.