

wwWareShop System Privacy Policy

Definitions

Licensee - business entity using the wwWareShop system license (hereinafter also referred to as "**System**") provided by Licensor, being the personal data administrator ("**Personal Data Controller**") of Users.

User - a user of Online Services, such as Amazon, that is individuals and legal entities represented by individuals, whose data is submitted to the Online Service.

Processor - Licensor of the wwWareShop system, i.e. NAVIGAL Limited Liability Company with its registered office in Kraków, ul. Podole 60, postal code 30-394, entered in the Register of Entrepreneurs of the National Court Register under the number KRS 0000324788, whose registration documentation is kept by the District Court for Kraków-Śródmieście in Kraków, 11th Commercial Division of the National Court Register, NIP: 676-240-62-06, REGON: 121009007, with share capital of 100.000,00 PLN.

Website Service - an online system, e.g. Amazon, integrated with the System and transferring registered Users' data to it.

General informations for User

Identity information has been provided to Licensee.

The data may be collected as a result of: their voluntary submission by the Users (e.g. when filling out forms) and the use of cookies. Moreover, information may be collected about the user's IP address, the time of the inquiry and response sending, the address of the Internet service from which the user was redirected to wwWareShop and the type of software used by the user. This information is used for the purposes of system administration and to create statistics and analyses.

The Personal Data Administrator respects the right to privacy in its services, in particular, cares about the protection of personal data and uses appropriate technological and legislative solutions to prevent interference in the privacy of individuals and in the data of legal persons.

The activities of the Personal Data Controller related to the collection and processing of all data are aimed at guaranteeing individuals a sense of complete security at a level appropriate to applicable law, including Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter "RODO").

Within the System there may be placed external links that enable direct access to other websites or during System's usage there may be additionally placed cookies in the User's device in order to enable the User to use functionalities of Internet Services integrated with the System, e.g. Amazon. Each of such providers determines the rules of using Cookies in its privacy policy. We recommend that you read those policies.

Personal Data Administrator

The administrator of your data collected in connection with the use of the System is the Licensee, i.e. _____ located at _____,

address: _____,

NIP _____, Regon _____.

Data protection contact

Contact for all processing matters and to exercise your rights regarding the processing:

Security

We take an appropriate approach to the protection of User data and are constantly developing our System and its security processes. The security measures we use include:

- Training of all employees in information security, including personal data processing;

- restricted physical access to our buildings and access to our systems - to authorized individuals only;
- control mechanisms such as firewalls, user verification, strong data encryption and separation of roles, systems and data;
- proactive monitoring - we also use the highest standards in the industry to support the maintenance of a robust information security management system.

Justification for processing

Scope of processing

We process data that you enter or leave behind when using the services of the Website. This includes, in particular, data provided by you in the context of the forms provided as well as data provided by you while navigating the Website, i.e., among other things, data stored in so-called cookies or data provided by you during contact.

Regarding the User's use of the System, we also store http requests directed to the server. The browsed resources are identified by URL addresses and include the public IP address of the terminal device from which the inquiry was sent, the time of the inquiry, the number of data sent by the server, the URL address of the page previously visited by the user (so-called referrer link) - if the service was accessed through an external link, information about errors that occurred during the http transaction.

Processing purposes

1. User registration and participation in the website in order to conclude and perform the contract.

By using the registration form you register your participation in the Website as its User.

2. Submitting a transaction.

You can benefit from the services and products we provide. The personal data will be processed in order to cooperate and provide the service under the specified conditions.

3. Contacting the User upon request.

Using the form you can contact us.

4. Provide demonstration/test versions of the software.

By using this form you may submit a request for provision of demo/test versions. The personal data collected in this process will be processed in order to fulfill your request, including responding to your request appropriately and offering and providing you services related to the System.

5. Sending commercial information to the indicated e-mail address or telephone number.

Upon prior consent, commercial information shall be sent to the e-mail address or telephone number indicated by the individual person.

6. Marketing of the services and products of the Personal Data Administrator, including profiling.

Personal data obtained in the course of the User's use of the service, e.g. newsletter, will be used. Information concerning the offer will be sent to the e-mail address or telephone number indicated by you (direct marketing). The indicated purpose may also be realized by displaying personalized advertising on the basis of profiling (only on the basis of an express prior consent of the User).

7. Web push display.

Web push consists of displaying a question in your browser's address asking for your permission to receive notifications. You have the option to accept or block notifications. The content of the notification is created by the browser without the possibility of interference.

8. Performance of public law obligations.

It means the fulfillment of our obligations under generally applicable laws.

9. Performance of obligations related to the exercise of the User's rights indicated in the RODO.

Performing obligations related to the exercise of your rights indicated in the RODO.

10. Ensuring security on the site.

This includes preventing the distribution of malicious code, content, and preventing damage to the System and the Web Services.

Category of persons

Users of Online Services (e.g., Amazon), i.e., individuals and legal entities represented by individuals.

Legal basis

Article 6 (1a) RODO (consent of the data subject). [Purpose: 1, 2, 3, 4, 5, 6, 7, 9].

Article 6 (1b) RODO (processing necessary for the performance of the contract) [Purpose: 2, 3, 4, 6].

Article 6 (1c) RODO (processing necessary to comply with a legal obligation) [Purpose: 8].

Article 6 (1f) RODO (processing of employee data of an individual or legal entity necessary for the performance of a contract) [Purpose: 1, 2, 3, 4, 6, 9].

Period of storage

For purposes: 1, 2, 3, 4,

For the period necessary to fulfill the purpose of the processing. Once realized, the data will be archived and not used except for the purpose of asserting, defending or establishing counterclaims for the period of their limitation.

For purposes: 5, 7

For the period necessary to fulfill the purpose of the processing, but no longer than until you withdraw your consent, and after withdrawal exclusively for the purpose of defending against claims for the period of their limitation.

For purpose: 6

Until you object to the processing, and after you object only for the purpose of defending against claims for the period of their limitation.

For purpose: 8

For the period necessary for the fulfillment of obligations, after their fulfillment in order to defend against claims for the period of their limitation.

For purpose: 9

Until the rights of the data subject have been exercised and thereafter for the purpose of defending against claims for the period of their limitation.

For purpose: 10

Until you make an effective objection to the processing and thereafter for the purpose of defending against claims for the period of their limitation.

Willingness of providing data

Provision of any personal data on the Website is entirely voluntary and results from the provision of such data by the User through the Web Services. The System Licensee receives these data from the Web Sites as a Recipient (in accordance with Art. 4 (9) RODO) and then, processing them for its own purposes, becomes a Personal Data Controller for your data. The transfer of data - despite the voluntary submission of the transfer - may be necessary for the

performance of specific services or User requests, e.g. for contacting, concluding a contract, exercising the rights of the data subject or participating in an event or contest.

Processor

For the processing of your data, we may use a Processor who, at our direction, delivers to the System along with related services while performing the processing. We have entered into contracts with the Processor - this means that the Processor cannot do anything with your personal data other than the processing authority granted by us. It cannot share your data with any third party other than us (unless otherwise required by law) and is required to maintain complete confidentiality and security of data storage for the duration of the relationship, and upon termination of the relationship, to return the information received or delete it.

Receivers

In some circumstances, we may be legally obligated to share information about you - for example, by court order, law, or decision of a public authority. The receivers of your personal information may be companies that provide logistics and shipping services. In all cases we make sure that we have a lawful basis for sharing your information and we document our decisions.

Transfer of data to a so-called third country

We may transfer your personal data to our suppliers, Partners or service providers located outside the European Economic Area (EEA) for the purposes of processing.

At the same time, in order to ensure the security of your data, we strictly adhere to the transfer rules resulting directly from RODO and we transfer your data only to places where the level of security is guaranteed in accordance with decisions of the European Commission (e.g. to the USA only to entities included in the so-called Privacy Shield list).

Your entitlements

Under data protection law, you have specific rights depending on the basis on which the data relating to you is processed.

Rights of access

You have the right to find out whether we use or store your personal data - known as the right of access. In exercising this right, you can also ask us for a copy of your data.

Right of rectification

You can question the accuracy and content of the data we process and ask for it to be corrected or deleted. This is known as the "right of rectification". If your data is incomplete, you can also ask us to complete it, e.g. by adding new information or modifying the information we already have.

Right to erasure (right to be forgotten)

You can ask us to delete your data. This right is also known as the so-called "right to be forgotten" and is not absolute, i.e. if, for example, other legal provisions do not allow for deletion. Under the RODO, the right to erasure is effective, among other things, in the following circumstances:

- when we don't need your data anymore;
- you initially gave your consent for processing but now you want to withdraw it;
- you have objected the use of your data;
- we have been processing unlawfully your data.

We may refuse to exercise your right to be "forgotten" in the following circumstances:

- when we are required by law to keep your information,
- storing the data is necessary for the establishment, exercise or defense of claims.

Right to restrict the processing

You have the right to restrict how and to what extent we use your information, especially if you are concerned about the accuracy of the information we hold or how we use it. If necessary, you can also request that certain information about you be deleted (see "right to erasure"). This right is closely linked to your rights to challenge the accuracy of your data and to object to its use.

Right to object the processing

Under certain circumstances, you have the right to object to the processing (use) of your data, e.g. if you disagree with the processing based on the legitimate interests of the Personal Data Administrator. If your objection is justified, we must stop using your data for the purpose for which they were originally processed, unless we can provide reasons to justify the continued use of your data despite your objection.

You have an absolute right to object to the use of your data for marketing purposes, as well as the right to object to profiling. In this case, if you object we will absolutely stop using your data for this purpose.

Right to data portability

You have the right to obtain personal data relating to you in a way that is accessible and readable e.g. as an excel file or compatible format. You also have the right to ask us to transfer your data to another entity - we will do this if the transfer is, as the DPA says, "technically feasible". This right only applies to information you have provided to us on the basis of consent or in the performance or negotiation of the terms of a contract, and the processing is carried out by automated means.

Right to withdraw the permission

If your data are processed on the basis of your consent, you may additionally exercise your right to withdraw your consent at any time - please note, however, that the withdrawal does not affect the lawfulness of the processing before the withdrawal.

Right to submit a complaint to the supervisory authority

We work to high standards when it comes to processing your personal information. If you have questions or concerns, please contact us and we will be sure to respond.

If you remain dissatisfied with the content of the answer or the exercise of your rights, you may file a complaint with the appropriate supervisory authority in the field of personal data protection - in Poland to the [President of the Office for Personal Data Protection](#).

Fulfillment of your rights

You can ask us to exercise your rights either verbally or in writing. If you make your request verbally, we recommend that you also send us your request in writing or by email - so that we leave a clear trail of correspondence. This will also provide us with confirmation of your position or requests and enable us to respond to your requests and in accordance with your expectations as soon as possible.

We do not charge for the exercise of your rights and aim to provide information within a maximum of one month - if we find that we need more time we will let you know. We may charge a fee in certain circumstances, for example, if you request a copy of your data again - but we will let you know in advance.

The following communication channels may be used to obtain information regarding processing:

- phone: _____
- e-mail: _____
- post: _____
- using the contact form on _____

Cookies

The Website uses cookies which are computer data, in particular text files that are stored on the User's terminal equipment. Cookies usually contain the name of the website they come from, time of storage on the terminal device and a unique number.

The entities that put the information in the form of cookies on the device that is used to access the System is the Personal Data Administrator, but also partners of the Personal Data Administrator, among others, analytical service providers, advertisers, developers of the System (i.e. the Processor).

Use of Cookies

Cookies are used for:

- providing the services of the System;

- facilitate the use of the System while viewing it;
- subsequent identification when the System is reconnected to the device on which they were stored;
- to create statistics which help to understand how the System users use the System, which allows to improve its structure and content;
- to adapt the content of the System to specific User preferences and to optimize the use of the System according to individual needs of the User;
- Presentation of advertisements, among other things, in a manner that takes into account the interests of the User;
- exchange information with the Web Services in order to mediate their services using the System.

Types of Cookies

Within the System we may use the following types of Cookies:

- "session" - stored in the User's terminal equipment until they leave the System or switch off the Internet browser;
- "persistent" - stored in the User's terminal equipment for the time specified in the parameters of cookies or until they are deleted by the User;
- "efficiency" - making it possible to collect information on the manner of using the Service's websites;
- "functional" - saving the User's selected settings and personalize the interface of the System User;
- "own" - posted by the System;
- "external" - coming from an external site, i.e. the Websites.

Managing browser settings

Web browsing software, i.e. a web browser, usually allows the storage of cookies on the User's end device by default. You can change your settings in this regard. The Internet browser allows deleting Cookies. It is also possible to block Cookies automatically. Detailed information on this subject can be found in the help or documentation of the Internet browser used by you.