

# Privacy Policy

GABONA Group



Warsaw, May 2018

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Below, we present information on the principles and methods we use to process your personal data in connection with our activities. In the principles, you will find essential information about how the GABONA Group handles your personal data.

## Who is the controller of my personal data?

Your personal data are controlled by entities within the GABONA Group in Poland (joint controllers). The GABONA Group comprises companies responsible for online sales of cosmetic products and accessories under the “GABONA,” “TRENA,” “TOOLS FOR BEAUTY” and “i-STYL” brands, and for deliveries of goods in Poland and in the European Union. These are:

- (i) Gabona Grzegorz Hryciuk, 42/47 Wielicka Street, 02-657 Warsaw, NIP [Tax ID No]: 5372004333;
- (ii) Gabona Spółka z ograniczoną odpowiedzialnością [limited liability], 47 Świeradowska Street, 02-662 Warsaw, KRS [National Court Register No]: 0000539330, NIP [Tax ID No]: 8381847771;
- (iii) Gabona Spółka z ograniczoną odpowiedzialnością Spółka komandytowa [limited liability, limited partnership], 47 Świeradowska Street, 02-662 Warsaw, KRS [National Court Register No]: 0000604774, NIP [Tax ID No]: 5213725126;
- (iv) Gabona Group Spółka z ograniczoną odpowiedzialnością [limited liability], 47 Świeradowska Street, 02-662 Warsaw, KRS [National Court Register No]: 0000631530, NIP [Tax ID No]: 5213744454;
- (v) Gabona Group Spółka z ograniczoną odpowiedzialnością Spółka komandytowa, [limited liability, limited partnership] 47 Świeradowska Street, 02-662 Warsaw, KRS [National Court Register No]: 0000639087, NIP [Tax ID No]: 5213749374;
- (vi) Trena Spółka z ograniczoną odpowiedzialnością [limited liability], 47 Świeradowska Street, 02-662 Warsaw, KRS [National Court Register No]: 0000267534, NIP [Tax ID No]: 5342340718;
- (vii) Trena Spółka z ograniczoną odpowiedzialnością Spółka komandytowa [limited liability, limited partnership], 47 Świeradowska Street, 02-662 Warsaw, KRS [National Court Register No]: 0000618365, NIP [Tax ID No]: 5213736147;
- (viii) Tools For Beauty Spółka z ograniczoną odpowiedzialnością [limited liability], 21/23/8 Aleksander Wejnert Street, KRS [National Court Register No]: 0000663331, NIP [Tax ID No]: 5213767627.
- (ix) Tools For Beauty Spółka z ograniczoną odpowiedzialnością Spółka Komandytowa [limited liability, limited partnership], 21/23/8 Aleksander Wejnert Street, KRS [National Court Register No]: 0000681155, NIP [Tax ID No]: 5213783879;

On 25 May 2018, the entities within the GABONA Group concluded a Joint Data Controller Agreement, under which they agreed to jointly implement and maintain measures to ensure safety and confidentiality of your personal data. In matters related to personal data, the company responsible for personal data protection is Gabona Sp. z o.o. Sp.k. Notwithstanding this, you may exercise your rights under the GDPR (and indicated in the Privacy Policy) with respect to each of the companies within the GABONA Group.

In matters related to your personal data protection, you may always contact us by email at: [ado@gabona.co](mailto:ado@gabona.co), or by post at: Gabona Sp. z o.o. Sp.k., 6B Wspólna Droga Street, 05-850 Jawczyce, marked “Personal data.”

## Where does the GABONA Group collect my personal data?

We acquire your personal data mainly from you. You provide us with your data to establish contact with the GABONA Group, when you make a purchase in our online shop, send us your email address, complete a contact form, and even – when you give us your business card. Also, we collect your data in connection with the business activities conducted by the GABONA Group.

### Customers, counterparties and suppliers

If you are our customer, counterparty or supplier and you are a sole proprietor or you represent a company or an organisation unit, we collect your personal data mainly from you. You provide us with your data to establish contact with the GABONA Group, when emailing us. Also, we collect your data in connection with the business activity conducted by the GABONA Group and with product sale transactions.

If you are an employee of a company or an organisation unit, and the GABONA Group processes your personal data, although you have never provided us with them directly – sometimes your data may be transferred to us by third parties, at your request or in connection with your official duties. Your data may be provided to us by your employer, to enable us to contact you in connection with our cooperation with the entity by which you are employed.

### Online shop customers

If you are a customer of any online shop belonging to the GABONA Group, you provide us with your data at the time of registration with our online service, when opening a customer account, subscribing to a newsletter, taking part in promotional campaigns and partner programs or finally – when making a purchase in our online shop. We obtain your additional personal data, e.g. concerning your address of residence or your tax identification number (NIP), from you, in connection with the purchases you make in our online shops.

We also acquire your data in connection with any complaints you make, and when you contact our representatives and account managers.

### Employees and job applicants

If you are our employee or counterparty, your personal data are obtained mainly from you. You provide us with your personal data for necessary employment-related purposes – when concluding an employment contract, or completing a personal questionnaire. As your employer or principal, we must process your personal data to contact you and correctly settle all issues related to your employment, including for tax or social security purposes. Sometimes, your personal data may be given to us by third parties, e.g. state authorities that contact the GABONA Group as your employer.

If you have only taken actions to start cooperating with us and you would like to send your CV or/and cover letter to the GABONA Group, we will acquire your personal data to contact you and include you in the recruitment process. We may use the assistance of external entities – dedicated recruitment portals or

recruiters. In that case, your personal data is provided to us by these entities, with your consent and at your request.

## For what purposes does the GABONA Group process my data?

### Economic activity

If we have acquired your personal data in connection with our business activity, your personal data are used for the purposes of selling and buying processes. In particular, this includes obtaining your contact data for the GABONA Group to establish and maintain contact with you in the course of our cooperation.

We also use your address and registration details to deliver goods to a location you indicate, to produce sale documentation, or to settle our cooperation. We also need your personal data, if you wish to take part in promotional campaigns or partners programs, to exercise your rights regarding our cooperation – to make a complaint, use the warranty, or – where applicable – the guarantee.

If you are a sole proprietor or you represent a company or an organisation unit – we also process your data for tax, legal and accounting purposes. We need them in order to include applicable data in a contract or invoice, and to use them in our tax records. However, we always process your personal data in connection with our business activity.

If you are an employee of our counterparty or supplier, your personal data are particularly necessary for us to establish and maintain contact with you or with the entity that employs you – again, only for economic purposes.

Your personal data used by us for purposes related to economic cooperation are not used by the GABONA Group for any other purposes without your consent. In particular, without your express consent, we do not process your data for marketing purposes.

### Operating an online shop

We process your personal data to maintain the functionality of our online shops, in accordance with the applicable Shop Regulations. In particular, we use your personal data to give you an opportunity:

- (i) to place an order;
- (ii) to open and operate a customer account;
- (iii) to participate in promotions, competitions, partner programs;
- (iv) to contact the GABONA Group using our complaint form which facilitates our complaint process.

If you decide to make a purchase in our online shop, your data are used to complete the order and delivery. In particular, this includes the completion of the payment process (including a due refund or returning a due amount of money to you as a customer), order confirmation, and finally – delivery of products to the address you indicate. We always confirm the completion of an order, issuing relevant sale documents in accordance with tax regulations (an invoice or a receipt).

Also, we use your data to provide you with services connected with the goods you buy, and to provide you with warranty or guarantee protection, or with the right to withdraw from the sale contract.

Your personal data used by us for purposes related to the operation of online shops are not used by the GABONA Group for any other purposes without your consent. In particular, without your express consent, we do not process your data for marketing purposes.

## Managing the employment relationship

If you are our employee or contractor, we use your personal data for purposes related to your employment. As your employer or principal, we need to respect a number of obligations – both in the scope of correct arrangement of our cooperation, and in HR and payroll matters. As your employer, we also have certain rights – we use your personal data e.g. to establish contact with you or to check the effects of your work. In addition, we need your personal data to give you access to benefits and entitlements.

Moreover, we use your data to provide you with benefits and support in the event of your sickness or maternity, and in case of any accidents at work. Again, the goal of processing your personal data is the correct management of the employment relationship, order contract, a contract to perform a specific task or any agreed form of cooperation between us, and to protect your vital interests.

We may also use your personal data to share information about you with third parties, e.g. a bank at which you applied for a loan, an insurer, or a public authority which approaches us with a question. In such cases, your personal data are disclosed for your benefit, at your request, or in connection with the legal obligations binding upon the GABONA Group.

Your personal data used by us for purposes related to the employment relationship, order contract, a contract to perform a specific task or any agreed form of cooperation are not used by the GABONA Group for any other purposes without your consent. In particular, without your express consent, we do not process your data for marketing purposes.

## Recruitment

If you apply for employment with the GABONA Group, your personal data are used solely for the purposes of the recruitment process. We use your data to learn about your level of education and professional experience, to evaluate your suitability for work at the GABONA Group, and finally – to contact and invite you to an interview.

If, after the recruitment, we decide to hire you, your personal data shared during the recruitment process may be used for the purposes of your future employment – in this way, you will not need to provide them again. The personal data you share in the CV or/and cover letter are most often kept in your employee file.

Your personal data used by us for purposes related to the recruitment are not used by the GABONA Group for any marketing purposes without your consent.

## Establishing contact, complaints

If you email us or get in touch with the GABONA Group using a contact or a complaint form on the websites of our online shops, your personal data are used by us to correspond with you and to respond to an inquiry or a complaint, appropriately to your inquiry or message.

If you contact us for commercial purposes (e.g. to order goods or use our services), your personal data may be used for a commercial offer to be addressed to you – but only to the extent required by you, and in respect of the inquiry you send.

Notwithstanding the above, even if we establish communication for commercial purposes, we do not use your personal data without your consent for marketing purposes in connection with any other offers than the one you expressly request when contacting us.

### Pursuing and defending claims

It may happen that we have to use your personal data to pursue or defend our claims and rights, also in court. We hope that does not happen, but if there is any dispute between us – we may be forced to use your personal details in the course of judicial, arbitration, or mediation proceedings.

In such an event, we may use your personal data but only to the necessary extent and in connection with pending negotiations or proceedings. We may use your data to summon you to be a witness in a case, or – if you are our counterparty or supplier – because of you being a party to the case.

Your personal data used by us for purposes related to the pursuit or defence of claims are not used by the GABONA Group for any other purposes without your consent. In particular, without your express consent, we do not process your data for marketing purposes.

### Marketing purposes

If you grant your consent – your personal data may be processed by the GABONA Group also for marketing purposes, i.e. to promote our product or service offering. As part of our marketing, we want to be able to present to you our new range of products or services, as well as our new commercial or business solutions applied in our activities. We also want to inform you about our promotions, campaigns or programs.

In our online shops, you may subscribe to a newsletter, by way of which, for marketing purposes, we will email you with information about new products, campaigns, programs or promotions. You can unsubscribe from the newsletter at any time. Once you have unsubscribed, we will no longer send you messages this way.

Newsletter unsubscription/resignation is possible by:

- (i) sending a message to the following address: sklep@trena.pl with, for example, the following content "I unsubscribe from the newsletter" (if you want to unsubscribe from the newsletter sent by the store trena.pl);
- (ii) sending a message to the address biuro@istyl.pl with, for example, the following content "I unsubscribe to the newsletter" (if you want to unsubscribe from the newsletter sent by istyl.pl store);
- (iii) using the "unsubscribe" button appearing in the lower right corner of the content of the newsletter received.

Upon unsubscription, we will delete your email address unless you have consented to the further use of your data or we reserve the right to further use your personal data in the scope and manner permitted by the law, of which we inform you in this notice.

In addition, providing that in the course of our cooperation you have expressed separate consent to electronic or telephone commercial communications, we use your email address or/and telephone number to communicate our commercial offer.

## To what extent does the GABONA Group process my personal data?

### Customers, counterparties and suppliers

If we use your personal data in connection with our economic activities, including for commercial and marketing purposes, we may process your personal data in the following scope:

- (i) first name and last name;
- (ii) company name (if you are a sole proprietor);
- (iii) your job role or position within the company structures;
- (iv) address of residence;
- (v) service address;
- (vi) delivery address;
- (vii) Tax ID No (if you are a sole proprietor);
- (viii) email address (also company);
- (ix) phone number (also company);
- (x) information about your bank and bank account number;
- (xi) IP number used by you to communicate with our online service;
- (xii) history of your communications with the GABONA Group;
- (xiii) history of our cooperation (information about orders and the range of purchased goods or services, payments made, etc.);
- (xiv) data from publicly available sources;
- (xv) your complaints;
- (xvi) additional information about you which you may have included in correspondence or communications with us;
- (xvii) your consents ;
- (xviii) cookies and information about the device you use to access our service (such as: device type, settings, browser information, etc.).

The abovementioned data may also be collected by the GABONA Group when you make a purchase in an online shop belonging to the GABONA Group.

### Employees and job applicants

If you are our employee (contractor) or you contact us to establish cooperation with the GABONA Group, we may process your personal data in the following scope:

- (i) first name and last name;
- (ii) image;
- (iii) address of residence;
- (iv) service address;
- (v) your date of birth;



- (vi) Personal ID No;
- (vii) Tax ID No (if any);
- (viii) Your citizenship;
- (ix) email address (also company);
- (x) phone number (also company);
- (xi) information about your bank and bank account number;
- (xii) your job position;
- (xiii) your education;
- (xiv) information about the current or previous employment (such as your employer's or principal's data, period of employment, etc.);
- (xv) information about your remuneration;
- (xvi) information about your economic situation, and more precisely – your household income per family member (if GABONA Group associates certain services or benefits with such information);
- (xvii) your health information (to the extent you provide us with such data in connection with an employment relationship or occupational medicine examinations);
- (xviii) information about the collection of pension, disability, or other health benefits.

## Persons who contact us and complain about goods

If you email us an inquiry, or contact us through a contact form on the website of our online shop, we may process your personal data in the following scope:

- (i) first name and last name;
- (ii) address of residence;
- (iii) telephone number;
- (iv) email address;
- (v) bank account number;
- (vi) IP number used by you to communicate with our online service;
- (vii) additional information about you which you may have included in correspondence or communications with us;
- (viii) cookies and information about the device you use to access our service (such as: device type, settings, browser information, etc.).

## On what basis does the GABONA Group process my personal data?

The GABONA Group assures that your personal data are processed only in accordance with the law. This means that we always process your personal data on a specific basis which we are able to prove right. The basis for personal data processing may differ depending on the purposes for which we process personal data.

### Economic activity

If we have obtained your personal data in connection with our economic activities, in the first place we process your data to fulfil our agreement on cooperation, and secondly, to make it possible for you to

participate in promotional campaigns, partner programs, finally make it possible for you to exercise your rights to guarantee or warranty.

Therefore, the basis for data processing is the necessity to use your personal data to execute a transaction of delivery of goods or services. If an entity other than you is a party to the Agreement (e.g. we have received your data from your employer, or you act as a representative of a company or an organisation unit for communication purposes), the basis for the processing of your personal data is the use of such data for purposes deriving from legitimate interests of the GABONA Group and that entity (third party), e.g. to ensure the correct performance of delivery or service.

## Operating an online shop

The basis for processing your personal data in connection with the use of an online shop depends on the purpose for which you use that online shop.

- (i) Your personal data provided in order to open a customer account and in connection with your subscription to a newsletter are processed by us to execute an agreement to provide services by electronic means. Regarding the newsletter, also your consent is the basis on which we may send you marketing information;
- (ii) Your personal data you provide in connection with purchases made at our online shops are processed for the purposes of fulfilment of the sale contract, promotional campaigns or partner programs (which you have agreed to join) and to enable you to exercise your right to warranty or guarantee;
- (iii) to the extent we wish to ask you about your opinion on a particular product or service – your data are processed in this scope, on the basis of the so-called legitimate interest of the controller which we have in the continuous improvement of our services and product offering;
- (iv) if you contact us to ask a question about how we operate an online shop, or how to carry out certain procedures – we process your personal data to provide you with an answer to your question, and referring to a legitimate interest related to our wish to provide you with the possibly most accurate information about our activities.

In addition, any information on the way you use our service website which we may obtain through the so-called cookies are processed with your consent expressed in accordance with Article 173 of the Telecommunications Law.

If you communicate with us using the contact form, we process your personal data on the basis of your consent expressed in connection with the inquiry and contact establishment.

If your consent is the basis for processing of your personal data, you have the right to revoke your consent at any time; however, this does not invalidate processing of your personal data in the period of validity of your consent.

## Handling the employment relationship

All personal data which the GABONA Group processes in connection with established cooperation on the basis of an employment contract, order contract, a contract to perform a specific task or any agreed form of cooperation are used for the correct performance of the employer's role. Such data must be used by the GABONA Group to fulfil the obligations imposed on the GABONA Group under Polish regulations

governing particular forms of employment or cooperation, and to enable the GABONA Group to exercise its rights as an employer.

Sometimes your sensitive (medical) data are also used when necessary for the fulfilment of obligations imposed by social insurance regulations or provisions concerning preventive medicine or occupational medicine.

Therefore, the basis for processing of your personal data is the necessity of their use for the correct performance of the employment contract which binds you with the GABONA Group, and to fulfil our legal obligation imposed on us by labour law or civil law regulations. In the scope of your personal data, the basis for processing is the necessity to use them for the controller or the data subject to fulfil obligations and to exercise individual rights in the area of labour law, social security and social protection, and for preventive medicine or occupational medicine purposes, in order to evaluate an employee's fitness for work, for medical diagnosis, to provide medical care or social care.

## Recruitment

In recruitment processes, we always try to obtain your consent regarding processing of personal data for recruitment purposes, asking you for the relevant consent to be included in the CV or/and cover letter you submit. Thanks to this, it is possible to avoid doubts as to whether we have the right to use all personal data provided by you in the documents you send or during the recruitment process.

However, even if you do not consent to the processing of your personal data for recruitment processes (e.g. you send us your CV without the necessary consent), we will be able to process your personal data to the extent necessary for the recruitment process.

Therefore, the processing of your personal data is based on your consent, and in case of its absence – the necessity for your data to be used for the commencement of the recruitment steps to conclude an employment contract, an order contract, a contract to perform a specific task or any agreed form of cooperation.

In this case, your personal data are processed on the basis of your consent or the necessity to use your personal data in order to take the actions you have requested, before the conclusion of the contract. If your consent is the basis for the processing of your personal data, you have the right to revoke your consent at any time; however, this does not invalidate processing of your personal data in the period of validity of your consent.

Your consent in this respect is voluntary, but necessary for the recruitment process. Without your consent to processing of your data in this scope we will be unable to contact you and conduct the recruitment process.

## Establishing contact, complaints

If you communicate with us using a contact form or a complaint form, we process your personal data on the basis of your consent expressed in connection with the inquiry and contact establishment.

If you contact us otherwise, for example by electronic mail, it is necessary for us to process your personal data in order to take actions at your request, in accordance with the contents of your inquiry or message.

In this case, your personal data are processed on the basis of your consent or the necessity to use your personal data in order to take the actions you have requested, before the conclusion of the contract. If your consent is the basis for processing of your personal data, you have the right to revoke your consent at any time; however, this does not invalidate processing of your personal data in the period of validity of your consent.

Your consent in this respect is voluntary, but necessary for us to contact you. Without your consent to processing of your data in this scope we will be unable to contact you.

### Pursuing and defending claims

If we use your data in connection with the pursuit or defence of claims, the basis for processing of your personal data is a legitimate interest of the GABONA Group as the controller of your personal data. The use of your personal data is necessary for the protection of interests of the GABONA Group, e.g. in the scope of debt collection, defence against unjustified claims, etc.

### Marketing purposes

We process your personal data for marketing purposes only on the basis of your consent enabling the GABONA Group to send you commercial and marketing messages. We take care to ensure that whenever you express your consent to processing of your data for marketing purposes you are aware and know that your data will also be used by us to present you information about our products, programs, or promotions.

When processing your data for marketing purposes, we would like our website to display offers, programs and promotions tailored to your interests. For this purpose, we conduct profiling which, however, in no case affects your rights or freedoms, and does not affect you in any other similar way.

The possibility to start and maintain cooperation with us is never conditioned on your consent to processing of your data for marketing purposes. It is completely free and voluntary. You have the right to revoke your consent at any time; however, this does not invalidate processing of your personal data in the period of validity of your consent.

## How long does the GABONA Group store my personal data?

The period over which we store your personal data depends on the purpose of their processing. And thus:

- (i) **if you are our counterparty or supplier, or if you act on their behalf** – your personal data are processed over the term of the contract or cooperation. After this period, we process your data for purposes related to accountability of our actions as part of personal data protection, and for a period of limitation of claims related to cooperation under the relevant regulations, but no longer than 10 (ten) years;
- (ii) **if you are our employee or contractor** – we process your personal data over the entire period of cooperation or employment, and during a period required by legal regulations on storing and archiving documents and information about your employment, but no longer than for a period of fifty (50) years;
- (ii) **if you provide us with your data in connection with a recruitment process** – we store your personal data for the period of the recruitment process, and if no recruitment process is pending

- for one (1) year after the receipt of your CV or/and cover letter. If we store your personal data for that period, we will be able to contact you in case we take steps to employ at a later time;
- (iii) **if you get in touch with us** – we store your personal data over the entire period of communication and correspondence, and also for the period in which we handle a matter or provide you with a set of answers – we store such data for no more than three (3) years after the end of communication, in order to make it possible for you to come back, if necessary, to earlier conversations and issues, and to account for our actions in the scope of personal data protection;
- (iv) **acquired information about the manner in which you use our service** – we use it over the entire period of cooperation, and for three (3) years of the date on which you last visited our service;
- (v) **personal data used by us for marketing purposes** – we process them until you have withdrawn your consent to processing of personal data for that purpose, but no longer than for five (5) years of the time when you expressed your consent.

## Who is the recipient of my personal data processed by the GABONA Group?

We make sure that your personal data are shared only with persons who must access them for the GABONA Group to conduct effective cooperation, or in connection with any legal obligations imposed on the GABONA Group. Your personal data are shared with:

- (i) **employees and partners of the GABONA Group, involved in the management of cooperation or employment** – however, in each case we ensure that such persons hold the relevant authorisations to process your personal data and agree to maintain confidentiality in this respect;
- (ii) **entities providing IT and hosting services for the GABONA Group** – we also process your data in electronic form, which means that they may also be accessed by entities providing IT services to us, as well as hosting service providers who operate the servers where we store our data, also in the scope of electronic mail;
- (iii) **shipment or transport companies** – for the purposes of delivery of goods or other items (e.g. documents) to the address indicated by you at the time of purchase or during cooperation;
- (iv) **entities providing the GABONA Group with legal, tax consultancy, accounting, HR and payroll services** – to the extent in which the disclosure of your data is necessary to ensure correctness of tax settlements, in the scope of HR and payroll, or in connection with pending proceedings. To the same extent, access to your personal data is granted to entities providing the GABONA Group with legal services, e.g. involved in giving opinions on documents which contain your personal data;
- (v) **public bodies, courts and tribunals** – to the extent that the provision of your personal data is necessary or required due to pending proceedings or in connection with an obligation to share the data with particular authorities on the basis of legal regulations (settlements with the Tax Office and the Social Insurance Institution, etc.).

In no case will the GABONA Group share your details with third parties for commercial purposes. We do not sell your data, so you do not need to worry that they would be shared with anyone to whom you do not want to provide your data.

# How are my personal data processed and protected?

## Principles of personal data processing

The GABONA Group uses its best effort to make sure that your personal data are processed in accordance with the applicable law and with due regard to the principles of their processing as indicated in the GDPR. The basic principles and standards of personal data processing at our company are defined in the detailed Privacy Policy which each employee and partner is obligated to get to know. This way, we ensure that all persons involved in our activities are aware how important it is to process your personal data in due manner.

The basic principles which we respect when processing your personal data are:

- (i) **the principle to process personal data in accordance with the law, reliably and transparently** – we make efforts to always process your personal data on a legally valid basis, and to ensure that the processes involved in processing of your personal data, as well as the purposes of processing, are always clear and understandable to you;
- (ii) **the data minimisation principle** – we make all efforts to process only such personal data as are adequate, appropriate and limited to what is necessary for the purposes for which they are processed. We share your personal data only with those recipients who require them for the purposes for which we process your data. Such recipients are granted access to your data only to the extent necessary to achieve this objective;
- (iii) **the restriction of processing purpose principle** – we collect your data only for concrete, express and legitimate purposes, and we do not process them further contrary to such purposes. We try to provide you with proper and precise information as to why and for what purposes we process your data;
- (iv) **the accuracy principle** – we make sure that the data we process are true, correct, and when necessary – updated, in order to avoid mistakes, distortions or other irregularities. If you conclude that your data have not been updated by us or are incorrect in any aspect, please contact us at: [ado@gabona.co](mailto:ado@gabona.co);
- (v) **the principle of limited storage of data** – we process and store your personal data only for such a period as may be necessary to achieve the purpose for which we process your data. When your data are not required by us any longer, in any scope – we delete all your data from our data bases and systems;
- (vi) **the integrity and confidentiality principle** – in the GABONA Group, we use the necessary measures to secure confidentiality and integrity of your personal data. It is our priority to ensure complete safety and protection of your personal data, by using updated and appropriate security measures;
- (vii) **the accountability principle** – in the scope of personal data protection, we do not only respect the principles and conditions of their processing, but we also make every effort to be able to prove, at any time, that we maintain such standards and comply with regulations. The principles of processing your personal data are contained in procedures; therefore, if you send us an inquiry, we will be able to provide you with full and reliable information about the actions we have taken using your data.

## Personal data security

We use the appropriate technical and organisational measures to ensure that your personal data are completely protected against their (voluntary or accidental) destruction, loss, modification, unauthorised disclosure or unauthorised access.

These measures include technical security measures (adequate protection of rooms and systems where your personal data are processed; security measures to prevent unauthorised persons from learning the contents of documents with personal data, making backup copies, etc.), and rules and procedures which we require to be followed by all our employees and partners.

Together, the applied measures allow us to protect your personal data against loss or disclosure. In addition, we improve them on an ongoing basis, appropriately to the changing environment and technological progress.

## What are my rights in connection with the processing of my personal data?

In connection with processing of your personal data by the GABONA Group, you have a range of rights which you may exercise at any time. Exercising these rights is free of charge, and the GABONA Group will make every effort to facilitate it.

### Rights related to personal data processing

With respect to our processing of personal data, you have the following rights:

- (i) **the right to access personal data** – at any time, you can ask us for information whether and to what extent we process your personal data, and for information about the principles of processing of your personal data;
- (ii) **the right to correct data** – at any time, you can ask us to correct or update your data, if you learn or conclude that your data are incorrect or outdated. To avoid any doubt, the GABONA Group may ask you for information allowing to identify you and to confirm the change or update of your data.
- (iii) **the right to restrict the processing** – if you conclude that, for a particular process, the catalogue of your personal data we process is too wide, you can request us to limit the extent of processing. Unless your request is contrary to the requirements imposed on us by the applicable law, or it is necessary for the performance of any agreement, we will restrict processing of your personal data to the necessary minimum or we will stop their further processing;
- (iv) **the right to delete data (the right to be forgotten)** – if you conclude that your personal data are processed by us without a legal basis, or we process them although they are not necessary for the purposes for which we have collected them – you may request that we delete your personal data from our data bases and systems. We will comply with your request, unless there is any other legitimate interest in the processing of your personal data, or an obligation to further process your personal data. In each case, we will try to comply with your request to the fullest possible extent, and if this is not possible – we will try to modify them so as to make them impossible to assign to you (by way of the so-called pseudonymisation);

(v) **the right to data portability** – in those cases when we process your data on the basis of consent or in connection with the performance of any agreement, and the processing is done automatically (e.g. in an IT system), at your request we will export the processed data to a separate file in a popular format, in order to facilitate their provision to another data controller.

The rights referred to above may be exercised on your request and by reporting them to our email address: [ado@gabona.co](mailto:ado@gabona.co), or by post at: Gabona Sp. z o.o. Sp.k., 6B Wspólna Droga Street, 05-850 Jawczyce, marked “Personal data.”

We also encourage you to contact us at these addresses whenever you have any concerns, questions or doubts as to the manner of processing of your personal data by the GABONA Group.

### The right to object

Separately, we wish to inform you that you have the **right to object to processing of your data**. If you conclude that, when your personal data are processed on the basis of a valid public interest or a legitimate interest of the GABONA Group or any third party – we process your data in a scope that is too broad (in an inadequate manner) – you may request processing of your personal data to be limited. You may use the same right if, at any time, you conclude that you do not want us to process your data directly for marketing purposes. When you have lodged your objection, we will not process your data in this scope and for this purpose, unless it is necessary due to the existence of any legitimate basis for our processing of your data, overriding your interests, rights and freedoms; or in order to establish, pursue or defend our claims.

The rights referred to above may be exercised by you and on your request by sending a relevant notification to our email address: [ado@gabona.co](mailto:ado@gabona.co), or by post at: Gabona Sp. z o.o. Sp.k., 6B Wspólna Droga Street, 05-850 Jawczyce, marked “Personal data.” We also encourage you to contact us at these addresses whenever you have any concerns, questions or doubts as to the manner of processing of your personal data by the GABONA Group.

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### The right to lodge a complaint

If you conclude that we have violated the principles of processing your personal data, you have the right to complain directly to the supervisory authority, i.e. the President of the Office for Personal Data Protection.

In order to exercise this right, you should present a comprehensive description of the situation at issue and indicate the action you believe has violated your rights or freedoms. The complaint should be filed directly with the supervisory authority.