# PRIVACY AND COOKIE POLICY

CZORA Sp. z o.o. Sp. K. puts great importance on the protection of personal data and compliance with the law when collecting and processing it. This Privacy and Cookie Policy has been created for this purpose – it contains all the information about CZORA's collection and processing of your personal data through your interaction with the website <a href="https://www.czora.eu">www.czora.eu</a>, and telephone or email contact.

Effective from: 15 July 2023.

CZORA Sp. z o.o. is the data controller. Sp. K. with its registered office in Opole, ul. Energetyków 3, 45-920 Opole, entered in the Register of Entrepreneurs of the National Court Register under National Court Register No. 0000643039, whose registration files are kept by the DISTRICT COURT IN OPOL, VIII ECONOMIC DIVISION OF THE NATIONAL COURT REGISTER, with the following NIP number: 9910507290, hereinafter as: CZORA SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ SPÓŁKA KOMANDYTOWA.

Any questions regarding the Privacy and Cookies Policy should be sent to the following email address: biuro@czora.eu or by post to: CZORA Sp. z o.o. Sp. K., ul. Energetyków 3, 45-920 Opole.

CZORA reserves the right to amend this Privacy and Cookies Policy by publishing an updated policy on www.czora.eu.

#### **PERSONAL DATA**

Contact with Czora can be made by telephone or via the email addresses provided at www.czora.eu.

When contacting CZORA, the user provides the e-mail address, telephone number or name as details of the sender of the message. In addition, the content of the message or conversation may contain other personal data. The provision of data is voluntary, but may be necessary in order to make contact.

Personal data will be processed in accordance with Regulation (EU) 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 (General Data Protection Regulation) - hereinafter referred to as: GDPR for the following purposes:

- to respond to an enquiry or complaint (on the basis of legitimate interest Article 6(1)(f) of the GDPR);
- to take action upon request prior to the conclusion of a contract (on the basis of Article 6(1)(b) of the GDPR);
- the conclusion and performance of the contract (on the basis of Article 6(1)(b) of the GDPR);
- the assertion or defence of claims by CZORA (on the basis of legitimate interest Article 6(1)(f) of the GDPR).

CZORA will keep the personal data of the user indicated in the email correspondence for the time necessary for the purpose of the processing set out in the paragraph above of this Privacy Policy.

All data provided in connection with an order, are processed for the purpose of processing the order and issuing a VAT invoice (Art. 6(1)(c) of the GDPR), possible exercise of the right to withdraw from the contract (Art. 6(1)(c) of the GDPR), inclusion of the VAT invoice in the accounting records (Art. 6(1)(c) of the GDPR) and on the basis of CZORA's legitimate interest (art. 6(1)(f) of the GDPR), which is the investigation and enforcement of claims, as well as the defence against claims, in particular in connection with warranty, complaints and returns procedures.

Order data will be processed for the time necessary to process the order and thereafter until the expiry of the limitation period for claims under the concluded contract. In addition, CZORA is also obliged to store VAT invoices with your personal data for a period of 5 (five) years from the end of the tax year in which the tax liability arose.

After all the necessary periods, personal data will be deleted immediately. However, in the event of interruption of the limitation period, these periods shall be extended accordingly, e.g. in the event of litigation, the indicated period shall be extended until the date of the final conclusion of the litigation.

In relation to the processing of your personal data, you have the right of access to the content of your data and the right to rectification, erasure, restriction of processing, the right to data portability, the right to object, 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.

CZORA will not be able to delete personal data to the extent that the processing is necessary (I) to exercise the right to freedom of expression and information, (II) to comply with a legal obligation requiring processing under European Union or Polish law, (III) to establish, assert or defend claims.

At any time, you are entitled to lodge a complaint with the competent supervisory authority (currently the President of the Office for Personal Data Protection) if you consider that the processing of your personal data violates the provisions of the General Data Protection Regulation;

CZORA shall apply technical and organisational measures to ensure the protection of the processed personal data appropriate to the risks and categories of data protected, and in particular shall protect the data from being disclosed to unauthorised persons, from being taken by an unauthorised person, from being processed in violation of the regulations in force, and from being altered, lost, damaged or destroyed.

CZORA works with internet service providers (including hosting) to ensure the stability and security of www.czora.eu.

### COOKIES

The www.czora.eu website uses cookies – IT data, in particular small text files, recorded and stored on the devices through which the user accesses the website. The cookies used by CZORA are safe for the user's devices. In particular, it is not possible for viruses or other unwanted software or malware to enter the devices via this route. These cookies allow the software used by the user to be identified and the service to be customised for each individual user. Cookies usually contain the name of the domain from which they originate, the length of time they are stored on the device and the assigned value.

Some cookies used by CZORA are deleted when the browser session ends, i.e. when the browser is closed (so-called session cookies). Other cookies are stored on your terminal device and enable CZORA to recognise your browser the next time you visit the website (so-called persistent cookies).

On your first visit to the website, you will be shown information on the use of cookies, together with the option to consent to their use in order to use advertising tools for remarketing campaigns.

By accepting CZORA's use of cookies for the above purposes, you consent to the use of cookies in accordance with the information contained in this Privacy and Cookie Policy. You can withdraw your consent at any time by changing your browser's cookie settings to suit your needs, in particular by deactivating cookies completely. However, if you block cookies, you may not be able to use the www.czora.eu website or individual functions.

Proprietary cookies are used to ensure the correct functioning of the website.

Third-party cookies refer to the Google Analytics and Google Adwords tools (as of 24 July 2018 under the name Google Ads) provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA and Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Dublin, Ireland, respectively (hereafter collectively as: Google).

CZORA does not identify the user and does not combine personally identifiable information with non-personally identifiable information previously collected through any advertising service or function of Google.

The use of both types of cookies is based on CZORA's legitimate interests (Article 6(1)of the GDPR), consisting of the correct operation of the website, the creation of statistics and their analysis for the purpose of optimising the www.czora.euwebsite. Cookies used on www.czora.eu are not used to identify users.

## **COMMUNITY TOOLS**

The social network Facebook is the controller of the personal data of its users on the basis of its own regulations. When a user interacts with CZORA via Facebook (liking/watching the page, reacting to posts, sharing, commenting, sending a private message), CZORA becomes the controller of personal data in addition to Facebook. CZORA processes data, such as name/nickname, profile picture, public profile and other information provided in messages or comments, on the basis of its legitimate interest (Article 6(1) of GDPR), in order to respond to comments and messages, to maintain relationships with users interacting with CZORA, and to analyse the effectiveness of communications.

The user's interaction with CZORA on Facebook does not, usually, connect CZORA with information that is transmitted in another way (e.g. by e-mail), unless something else results from the circumstances (e.g. a private message has been written to CZORA on Facebook in which an e-mail address has been provided requesting contact). CZORA does not pass on your personal data to anyone, however, Facebook as portal administrator has access to all user information.

If you wish your data to be processed in accordance with our Privacy and Cookie Policy, you should contact CZORA through channels other than the social

network. In case of an e-mail, for example, CZORA has control over what happens to this information and who reads it.

### **RECIPIENTS OF PERSONAL DATA**

Your personal data will be accessed by employees authorised by CZORA and only to the necessary extent. In addition, personal data may be entrusted to the following entities on the basis of concluded contracts: companies providing IT services (including Google Analytics service provider – Google LLC with its registered office in the United States of America and Google Adwords service provider – Google Ireland Limited) and server services, law firms providing legal and tax services, accounting companies, entities related by capital or personality to CZORA, responsible for the implementation of contractual obligations and those arising from the law, and made available to authorities entitled to process them on the basis of separate legal regulations.

The data collected via Google Analytics is mostly transmitted by Google LLC to servers in the United States and stored there, while the data collected via Google Adwords is transmitted to servers in Ireland.

The data collected by Facebook, including one collected via the plug-in provided by Facebook, is usually transmitted by Facebook Inc. to servers in the United States and stored there.