

PRIVACY POLICY OF PACKRAFTING.PL ONLINE STORE



VALID FROM **MARCH 10, 2023**

CONTENTS:

1. GENERAL PROVISIONS
2. GROUNDS FOR DATA PROCESSING
3. PURPOSE, GROUNDS AND DURATION OF DATA PROCESSING IN THE ONLINE STORE
4. RECIPIENTS OF DATA IN THE ONLINE STORE
5. PROFILING IN THE ONLINE STORE
6. RIGHTS OF THE DATA SUBJECT
7. ONLINE STORE COOKIES AND ANALYTICS
8. FINAL PROVISIONS

1. GENERAL PROVISIONS

- 1.1. This privacy policy of the Online Store is informative, which means that it is not a source of obligations for Service Recipients or Customers of the Online Store. The privacy policy contains primarily the rules regarding the processing of personal data by the Controller in the Online Store, including the grounds, purposes, and duration of personal data processing, as well as the rights of data subjects but also information on the use of Cookies and analytical tools in the Online Store.
- 1.2. The Controller of personal data collected via the Online Store is MARCIN ZDYBAŁ conducting business activity under the name CST MARCIN ZDYBAŁ entered into the Central Register and Information on Economic Activity of the Republic of Poland kept by the minister competent for the economy, with the following address functioning as the place of business and delivery address: ul. Siewierska 35, 42-600 Tarnowskie Góry, NIP 4980118697, REGON 240607489, e-mail address: office@pinpack.eu, telephone number: 0048 606711418; 0048 796346372—hereinafter referred to as the "Controller" and being at the same time the Online Store Service Provider and the Seller.
- 1.3. Personal data in the Online Store are processed by the Controller under applicable law, in particular under the European Parliament and of the Council Regulation (EU) 2016/679 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" or "GDPR Regulation". The official text of the GDPR Regulation: <http://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX%3A32016R0679>
- 1.4. Use of the Online Store, including making purchases, is voluntary. Similarly, providing personal data by the Service Recipient or Customer using the Online Store is voluntary, subject to two exceptions: (1) **concluding contracts with the Controller**—failure to provide – in cases and to the extent indicated on the Online Store website and in the Regulations of the Online Store and this privacy policy – personal data necessary to conclude and perform the Sales Agreement or the contract for the provision of Electronic Services with the Controller, results in the inability to conclude the said contract. Providing personal data is in this case a contractual requirement and if the data subject wants to conclude a given contract with the Controller, he is obliged to provide the required data. Each time, the scope of data required to conclude the contract is previously indicated on the Online Store website and in the Online Store Regulations; (2) **statutory obligations of the Controller**—providing personal data is a statutory requirement resulting from generally applicable legal provisions imposing on the Controller the obligation to process personal data (e.g., processing of data to keep tax or accounting books) and failure to provide them will prevent the Controller from fulfilling these obligations.
- 1.5. The Controller shall take special care to protect the interests of persons whose personal data it processes, and in particular, is responsible and ensures that the data collected by him are: (1) processed under the law; (2) collected for specified, lawful purposes and not subjected to further processing inconsistent with these purposes; (3) factually correct and adequate to the purposes for which they are processed; (4) stored in a form that allows the identification of data subjects for no longer than it is necessary to achieve the purpose of processing, and (5) processed in a manner that ensures adequate security of personal data,

including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, using appropriate technical or organizational measures.

- 1.6. Taking into account the nature, scope, context and purposes of processing as well as the risk of violating the rights or freedoms of natural persons with different probability and the severity of the threat, the Controller shall implement appropriate technical and organizational measures to ensure that the processing is carried out in accordance with the GDPR Regulation and to be able to demonstrate this. These measures are reviewed and updated as necessary. The Controller uses technical measures to prevent unauthorized persons from obtaining and modifying personal data sent electronically.
- 1.7. Any words, phrases and acronyms that appear in this privacy policy and begin with a capital letter (e.g., **Seller, Online Store, Electronic Service**) should be understood per their definition contained in the Online Store Regulations available on the Online Store website.

2. GROUNDS FOR DATA PROCESSING

- 2.1. The Controller is entitled to process personal data in cases where—and to the extent that—at least one of the following conditions is met: (1) the data subject has consented to the processing of his personal data for one or more specific purposes ; (2) processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject before entering into a contract; (3) processing is necessary to fulfil the legal obligation imposed on the Controller; or (4) processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, which require protection of personal data, in particular when the data subject is a child.
- 2.2. The processing of personal data by the Controller requires the occurrence of at least one of the grounds indicated in point 2.1 of the privacy policy. The specific grounds for the processing of personal data of Service Recipients and Customers of the Online Store by the Controller are indicated in the next point of the privacy policy—in relation to the given purpose of personal data processing by the Controller.

3. PURPOSE, GROUNDS AND DURATION OF DATA PROCESSING IN THE ONLINE STORE

- 3.1. Each time, the purpose, grounds, and duration, as well as the recipient of personal data processed by the Controller, result from the actions taken by a given Service Recipient or Customer in the Online Store or by the Controller.
- 3.2. The Controller may process personal data as part of the Online Store for the following purposes, on the basis and in the periods indicated in the table below:

Purpose of data processing	Legal grounds for data processing	Data storage duration
Performance of the Sales Agreement or contract for the provision of Electronic Services or taking action at the request of the data subject before concluding the above-mentioned contracts	Article 6 (1) (b) of the GDPR Regulations (performance of the contract)—processing is necessary to perform the contract to which the data subject is a party or to take action at the request of the data subject before concluding the contract	The data is stored for the period necessary to perform, terminate or otherwise expire the concluded Sales Agreement or contract for the provision of Electronic Services.
Direct marketing	Article 6 (1) (f) GDPR Regulations (legitimate interest of the Controller)—processing is necessary for purposes arising from the legitimate interests of the Controller—consisting in taking care of the interests and good image of the Controller, his Online Store and striving to sell Products	The data is stored for the duration of the legitimate interest pursued by the Controller, but no longer than for the period of limitation of the Controller's claims against the data subject in respect of the Controller's business activity. The limitation period is determined by the law, in particular, the Civil Code (the basic statute of limitations for claims related to

		<p>the conduct of business is three years, and for the Sales Agreement two years).</p> <p>The Controller may not process data for direct marketing purposes in the event of an effective objection in this respect by the data subject.</p>
Marketing	Article 6 (1) (a) of the GDPR Regulations (consent)—the data subject has consented to the processing of his personal data for marketing purposes by the Controller	The data is stored until the consent of the data subject for further processing of his data for this purpose is withdrawn.
Keeping tax books	Article 6 (1) (c) of the GDPR Regulation in connection with Article 86(1) of the Tax Ordinance of January 17, 2017 (Journal of Laws from 2017 item 201, as amended)—processing is necessary to fulfil the legal obligation incumbent on the Controller	The data is stored for the period required by the law requiring the Controller to store tax books (until the expiry of the tax liability limitation period, unless tax laws provide otherwise).
Determining, investigating, or defending claims that the Controller may raise or that may be raised against the Controller	Article 6 (1) (f) Regulations of the GDPR (legitimate interest of the Controller)—processing is necessary for purposes arising from the legitimate interests of the Controller—consisting in determining, investigating or defending claims that may be raised by the Controller or that may be raised against the Controller	The data is stored for the duration of the legitimate interest pursued by the Controller, but no longer than for the period of limitation of claims that may be raised against the Controller (the basic limitation period for claims against the Controller is six years).
Using the Online Store website and ensuring its proper operation	Article 6 (1) (f) GDPR Regulations (legitimate interest of the Controller)—processing is necessary for purposes arising from the legitimate interests of the Controller—consisting in running and maintaining the Online Store website	The data is stored for the duration of the legitimate interest pursued by the Controller, but no longer than for the period of limitation of the Controller's claims against the data subject in respect of the Controller's business activity. The limitation period is determined by the law, in particular, the Civil Code (the basic statute of limitations for claims related to the conduct of business is three years, and for the Sales Agreement two years).
Keeping statistics and analysing traffic in the Online Store	Article 6 (1) (f) GDPR Regulations (legitimate interest of the Controller)—processing is necessary for purposes arising from the legitimate interests of the Controller—consisting in keeping statistics and analysing traffic in the Online Store to improve the functioning of the	The data is stored for the duration of the legitimate interest pursued by the Controller, but no longer than for the period of limitation of the Controller's claims against the data subject in respect of the Controller's business activity. The limitation period is determined by the law, in particular, the Civil Code (the basic statute of

	Online Store and increase the sale of Products	limitations for claims related to the conduct of business is three years, and for the Sales Agreement two years).
--	--	---

4. RECIPIENTS OF DATA IN THE ONLINE STORE

- 4.1. For the proper functioning of the Online Store, including the implementation of concluded Sales Agreements, the Controller must use the services of external entities (such as e.g., software provider, courier, or payment service provider). The Controller uses only the services of such processing entities that provide sufficient guarantees for the implementation of appropriate technical and organizational measures so that the processing meets the requirements of the GDPR Regulation and protects the rights of data subjects.
- 4.2. Personal data may be transferred by the Controller to a third country, and the Controller ensures that in such a case it will be done in relation to the country ensuring an adequate level of protection—following the GDPR Regulation, and in the case of other countries, that the transfer will take place based on standard data protection clauses. The Controller ensures that the data subject has the opportunity to obtain a copy of his data. The Controller provides the collected personal data only in the case and to the extent necessary to achieve a given purpose of data processing following this privacy policy.
- 4.3. The transfer of data by the Controller does not take place in every case and not to all recipients or categories of recipients indicated in the privacy policy—the Controller provides data only when it is necessary for the realization of the given purpose of personal data processing and only to the extent necessary for its realization.
- 4.4. Personal data of Service Recipients and Customers of the Online Store may be transferred to the following recipients or categories of recipients:
 - 4.4.1. **Carriers/forwarders/brokers couriers/entities servicing the warehouse and/or shipping process**—in the case of a Customer who uses the Online Store to deliver the Product by post or courier, the Controller provides the Customer's collected personal data to the selected carrier, forwarder or intermediary performing the shipment at the request of the Controller, and if the shipment is made from an external warehouse—to the entity servicing the warehouse and/or the shipping process—to the extent necessary to complete the delivery of the Product to the Customer.
 - 4.4.2. **service providers supplying the Controller with technical, IT and organizational solutions, enabling the Controller to run a business, including the Online Store and Electronic Services, provided through it (in particular computer software providers to run the Online Store, e-mail and hosting providers and management software providers company and providing technical assistance to the Controller)**—the Controller provides the collected personal data of the Customer to a selected supplier acting on his behalf only in the case and to the extent necessary to achieve a given purpose of data processing following this privacy policy.
 - 4.4.3. **providers of accounting, legal and advisory services providing the Controller with accounting, legal or advisory support** (in particular, an accounting office, law firm or debt collection company)—the Controller provides the collected personal data of the Customer to a selected supplier acting on his behalf only in the case and to the extent necessary to complete the given the purpose of data processing following this privacy policy.

5. PROFILING IN THE ONLINE STORE

- 5.1. The GDPR Regulation imposes on the Controller the obligation to inform about automated decision-making, including profiling, referred to in Article 22 (1) and (4) of the GDPR Regulation, and—at least in these cases—relevant information about the rules for taking them, as well as the significance and expected consequences of such processing for the data subject. With this in mind, the Controller provides information on possible profiling in this section of the privacy policy.
- 5.2. The Controller may use profiling in the Online Store for direct marketing purposes, but decisions made on its basis by the Controller do not concern the conclusion or refusal to conclude a Sales Agreement or the possibility of using Electronic Services in the Online Store. The effect of using profiling in the Online Store may be, for example, granting a given person a discount, sending them a discount code, reminding them about unfinished purchases, sending a Product proposal that may match the interests or preferences of a given person, or offering better conditions compared to the standard offer of the Online Store. Despite

profiling, it is the person who freely decides whether he or she will want to take advantage of the discount received in this way, or better conditions and make a purchase in the Online Store.

- 5.3. Profiling in the Online Store consists of the automatic analysis or forecasting of a given person's behaviour on the Online Store website, e.g., by adding a specific Product to the basket, browsing the page of a specific Product in the Online Store or by analysing the previous history of purchases made in the Online Store. The condition for such profiling is that the Controller has the personal data of a given person to be able to send him, for example, a discount code.
- 5.4. The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

6. RIGHTS OF THE DATA SUBJECT

- 6.1. **The right to access, rectify, limit, delete or transfer**—the data subject has the right to request the Controller to access their personal data, rectify it, delete it (“the right to be forgotten”) or limit processing and has the right to object to processing, and has the right to transfer his data. Detailed conditions for the exercise of the above-mentioned rights are indicated in Articles 15-21 of the GDPR Regulation.
- 6.2. **The right to withdraw consent at any time**—a person whose data is processed by the Controller based on consent (under Article 6 (1) (a) or Article 9 (2) (a) of the GDPR), has the right to withdraw consent at any time without affecting the lawfulness of the processing that was carried out based on consent before its withdrawal.
- 6.3. **The right to lodge a complaint to the supervisory body**—the person whose data is processed by the Controller has the right to lodge a complaint to the supervisory body in the manner and mode specified in the provisions of the GDPR Regulation and Polish law, in particular the Act on the Protection of Personal Data. The supervisory authority in Poland is the President of the Office for Personal Data Protection.
- 6.4. **Right to object**—the data subject has the right to object at any time—for reasons related to his particular situation—to the processing of personal data concerning him based on Article 6 (1) (e) (public interest or tasks) or (f) (legitimate interest of the Controller), including profiling based on these provisions. In this case, the Controller is no longer allowed to process this personal data, unless he demonstrates the existence of valid legally justified grounds for the processing, overriding the interests, rights and freedoms of the data subject, or grounds for establishing, investigating, or defending claims.
- 6.5. **Right to object to direct marketing**—if personal data is processed for direct marketing, the data subject has the right to object at any time to the processing of personal data concerning him for such marketing, including profiling, to the extent that the processing is related to such direct marketing.
- 6.6. To exercise the rights referred to in this point of the privacy policy, you can contact the Controller by sending an appropriate message in writing or by e-mail to the Controller's address indicated at the beginning of the privacy policy or using the contact form available on the Online Store website.

7. ONLINE STORE COOKIES AND ANALYTICS

- 7.1. Cookie files (cookies) are small text information in the form of text files, sent by the server and saved on the side of the person visiting the Online Store website (e.g., on the hard drive of a computer, laptop, or the memory card of a smartphone—depending on what device is used by the visitor to our Online Store). Detailed information on Cookie files, as well as the history of their creation, can be found, among others here: https://pl.wikipedia.org/wiki/HTTP_cookie.
- 7.2. Cookie files that can be sent by the Online Store website can be divided into different types, according to the following criteria:

Due to their supplier:	Due to their storage period on the device of the person visiting the Online Store website:	Due to the purpose of their use:
<ul style="list-style-type: none"> 1) own (created by the Controller's Online Store website) and 2) belonging to third parties/entities (other than the Controller) 	<ul style="list-style-type: none"> 1) session cookies (stored until logging out of the Online Store or turning off the web browser) and 	<ul style="list-style-type: none"> 1) necessary (enabling the proper functioning of the Online Store website), 2) functional/preferential (enabling the adjustment of the

	2) permanent (stored for a specific period of time, defined by the parameters of each file, or until manually deleted)	Online Store website to the preferences of the visitor), 3) analytical and performance cookies (collecting information on how to use the Online Store website), 4) marketing, advertising and social (collecting information about a person visiting the Online Store website to display advertisements to that person, personalize them, measure effectiveness, and conduct other marketing activities, including on websites separate from the Online Store website, such as social networks or other websites belonging to the same advertising networks as the Online Store)
--	--	--

7.3. The Controller may process the data contained in Cookies when visitors use the Online Store website for the following specific purposes:

using cookies in the Controller's Online Store	identification of Service Recipients as logged in to the Online Store and showing that they are logged in (essential cookies)
	remembering Products added to the basket to place an Order (necessary cookies)
	remembering data from completed Order Forms, surveys or login details to the Online Store (essential and/or functional/preferential cookies)
	adapting the content of the Online Store website to the individual preferences of the Service Recipient (e.g., regarding colours, font size, page layout) and optimizing the use of the Online Store pages (functional/preferential cookies)
	keeping anonymous statistics showing how the Online Store website is used (analytical and performance cookies)

7.4. Checking in the most popular web browsers which Cookies (including the period of operation of Cookies and their provider) are currently sent by the Online Store website is possible in the following way:

Chrome: (1) in the address bar, click on the padlock icon on the left, (2) go to the "Cookies" tab.	Firefox: (1) in the address bar, click on the shield icon on the left, (2) go to the "Allowed" or "Blocked" tab, (3) click on the "Cross-site tracking cookies", "Social network trackers" or "Content from trackers"	Internet Explorer: (1) click on the "Tools" menu, (2) go to the "Internet Options" tab, (3) go to the "General" tab, (4) go to the "Settings" tab, (5) click on the "View Files" box
Opera: (1) in the address bar, click on the padlock icon on the left, (2) go to the "Cookies" tab.	Safari: (1) click on the "Preferences" menu, (2) go to the "Privacy" tab, (3) click on the "Manage site data" field	Regardless of the browser, using the tools available, e.g., at: https://www.cookie-metrix.com/ or: https://www.cookie-checker.com/

- 7.5. By default, most web browsers available on the market accept cookies by default. Everyone can specify the terms of use of cookies using the settings of their own web browser. This means that you can e.g., partially limit (for example temporarily) or completely disable the option of saving cookies—in the latter case, however, it may affect some functionalities of the Online Store (for example, it may not be possible to follow the Order path through the Order Form because the Products are not saved in the basket during the subsequent steps of placing the Order).
- 7.6. Web browser settings regarding Cookies are important in terms of your consent to the use of Cookies by our Online Store—following the regulations, such consent may also be expressed through the web browser settings. Detailed information on changing the settings for Cookies and their self-removal in the most popular web browsers is available in the help section of the web browser and on the following websites (just click on the link):
- [Chrome browser](#)
 - [Firefox browser](#)
 - [Internet Explorer browser](#)
 - [Opera browser](#)
 - [Safari browser](#)
 - [Microsoft Edge browser](#)
- 7.7. The Controller may use Google Analytics and Universal Analytics services in the Online Store provided by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland). These services help the Controller keep statistics and analyse traffic in the Online Store. The collected data is processed as part of the above services to generate statistics helpful in administering the Online Store and analysing traffic in the Online Store. These data are aggregate in nature. When using the above services on the Online Store, the Controller collects such data as the sources and medium of acquisition of visitors to the Online Store and the way they behave on the Online Store website, information about the devices and browsers from which they visit the site, IP and domain, geographic data and demographic data (age, gender) and interests.
- 7.8. It is possible for a given person to easily block sharing information about their activity on the Online Store website with Google Analytics—for this purpose, you can, for example, install a browser add-on provided by Google Ireland Ltd. available here: <https://tools.google.com/dlpage/gaoptout?hl=pl>.
- 7.9. Due to the possibility for the Controller to use advertising and analytical services provided by Google Ireland Ltd. in the Online Store, the Controller indicates that full information about the principles of processing data of visitors to the Online Store (including information stored in Cookies) by Google Ireland Ltd. can be found in the privacy policy of Google services, available at the following address: <https://policies.google.com/technologies/partner-sites>.

8. FINAL PROVISIONS

- 8.1. The Online Store may contain links to other websites. The Controller urges that when you go to other sites, read the privacy policy established there. This privacy policy applies only to the Controller's Online Store.