

PRIVACY POLICY

1. INTRODUCTION

Your privacy is very important for us.

Orbico Beauty pays great attention to the obligation to protect user's privacy in accordance with applicable laws.

This Privacy Policy will enable you to understand the rules for protection of personal data followed by Orbico Beauty. We encourage you to read this information before providing your personal data.

The administrator of your personal data is Orbico Beauty spółka z ograniczoną odpowiedzialnością with the corporate seat in Warsaw at ul. Salsy 2, 02-823 Warszawa, registered in the Register of Entrepreneurs kept by the National Court Register for the capital city of Warsaw, XII Economic Division of the National Court Register, under number KRS 000061216 (hereinafter referred to as "the Company" or "Orbico Beauty"). The Company's contact details: tel. **+48 22 461 03 00**, e-mail: privacy.orbicobeautypl@orbico.com, responsible person: **Grzegorz Olszewski**

You must remember that when you grant relevant consents while using the web site [www. orbicobeauty.pl](http://www.orbicobeauty.pl) / you authorise Orbico Beauty to collect, register, organise, keep, use and/or transfer your personal data in compliance with this Privacy Policy.

2. When do we collect personal data?

Personal data are collected when you:

- visit the web site;
- provide contents in social networks;
- create an account on the web site,
- purchase on the web site or in our distribution chain outlets;
- register in one of our loyalty programmes;
- participate in social activities, such as games, competitions, product tests, client questionnaires or market surveys;
- contact us: call or send any request or complaint to our Client Service Unit, or evaluate our products and/or services;
- grant your consent to third parties to transfer your personal data to us.

3. What personal data do we collect?

In our opinion, any information that can identify a user directly or indirectly are „personal data”. We can collect the following personal data:

- information such as: surnames, given names, sex, phone numbers, e-mail, user name, password, birth date, age;
- information on payment method, especially the credit card number and expiry date;
- information on orders, such as: transaction number, purchases history, history or correspondence with the Client Service Unit, as well as information on your preferences, interests, web site activity and loyalty programme;
- information from social media accounts;
- information obtained from phone calls recorded by the Client Service Unit in order to ensure the best quality of our service and evaluation of our staff's work;

- technical information, especially IP address and information on the way the device moves in our web site;
- any other information provided by you while contacting the Client Service Unit or by external providers.

4. Why are your personal data collected?

Personal data may be collected for the following purposes:

- administering web site and improvement of services quality;
- processing your orders (orders, supplies invoices, post-sale evidence, etc.). This processing is necessary to carry out the agreement, to which you are a party;
- managing relations with Clients, especially in order to better understand their preferences and ensure personalised offers of our products and services (especially by e-mail, SMS, social networks or other media, or by displaying targeted commercials on web sites and social sites), as well as managing our loyalty programme. To that effect, we may perform segmentation operations based on preferences, interests and purchases and analyse viewed sites in order to better qualify our database. Creation of an account enables us to personalise consumer's needs. We enable purchasing without registration. Data are processed upon an express consent or when necessary for the above purposes;
- researching social interactions. Data are processed upon the Client's consent;
- in relevant cases data are collected to prevent and disclose frauds or crimes and to manage court disputes. Such processing is necessary for the above reasonable purposes;
- managing the Client's requests (advising, attending promotions, complaints. right to waive an agreement, data corrections or removals, etc.);
- any other legal purpose not mentioned in this Privacy Policy. The Client will be informed about the way, in which data are collected, processed and used.

We may use information about our Clients in anonymous and/or aggregated way for demographic profiling, researches, analyses and similar purposes.

5. Do we disclose your personal data?

Personal data of our Clients will be used by Orbico Beauty and may be transferred to our trustworthy partners to attain the goals of processing.

Data may be also provided to service providers acting in our name in order to process and fulfil orders, secure payments, manage the Client Service, manage technical operations, evaluate, review, analyse and manage digital campaigns, etc. We authorise service providers to use personal data only to the extent necessary to provide the services in our name or in order to fulfil any legal requirements. We guarantee that your personal data are always protected and secured.

The service providers may be situated inside the European Economic Area (EEA) or outside. If service providers are situated in any countries that cannot ensure the same level of protection of personal data as in Poland, we must:

- obtain express consent to provide personal data to third parties;

- conclude data transfer agreements compliant with the Standard Model of Clauses established by the European Commission.

We may provide information about our Clients in anonymous and/or aggregated way to third parties for demographic profiling, researches, analyses and similar purposes.

We inform that under applicable laws we are also required to provide personal data to local authorities, if this is required by the law or within the framework of any started investigation.

6. For how long are your personal data kept?

We exert all efforts to keep your personal data for a period necessary to attain the objectives provided in this Privacy Policy and in accordance with applicable laws.

As a rule:

- the Client data are kept for three years from the date of their collection or from the last contact with the Client or from termination of the commercial relationship, unless the Client objects or requests removal thereof. In the end of this 3-year period we may contact you again to learn if you still wish to receive commercial information. If we do not receive your clear positive response, your data will be removed or filed under applicable laws;
- ID card data are kept for one year in the case of exercise of the right of access, correction, limitation, removal or transfer, when the Client exercised the right to object and does not want to receive commercial information;
- ID card data are kept for three years as under the law we have to guarantee that the person, whom the data concern, receives no correspondence in at least 3 years and we want to retain the ID card in that period;
- credit card data are removed immediately after the transaction or are filed as evidence in accordance with applicable laws;
- as required under the law, data used to prove the truth or confirming execution of an agreement may be filed in accordance with applicable laws;
- data from recorded phone call may be kept for a maximum of six months.

7. How will we protect information about you?

Depending on the kind of personal data and related risks, Orbico Beauty applies appropriate safety means and technical and organisational measures to ensure safety and confidentiality of personal data in order to prevent their alteration, damage or delivery to unauthorised entities.

This can include the following practices: restricted access of employees authorised to have access to personal data because of their responsibilities, additional guarantee agreements with third party suppliers, evaluation of impact on privacy, internal inspections of our practices and the Privacy Policy and/or physical or logical implementation of safety measures (safe access, validation process, backup copies, anti-virus sf, network barriers, etc.).

8. What are your rights to your personal data and how can you contact us?

If you give us your email address, phone number or mailing address, you may receive emails, calls or periodic messages about our products, services or upcoming events.

You can unsubscribe at any time from our mailing lists by contacting us or cancelling the subscription. You can also change your preferences at any time in your account.

In accordance with applicable laws, the user has a right to access, correction, removal and transfer of personal data as well as the right to object and restrict processing. You can also withdraw your consent at any time.

In order to examine your request concerning the above matters, the Company may verify your identity, so as to prevent disclosure of user information to unauthorised parties.

To exercise these rights, you must send to us your signed request using a contact form or writing directly to us to the following address:

Orbico Beauty Sp. z o.o.,
ul. Salsy 2
02-823 Warszawa

You will be informed of the actions taken by us as soon as possible and in any case no later than one month after your request. However, we reserve the right not to respond to unfounded requests.

This Privacy Policy fulfils the information requirement related to the amendment of the laws on protection of personal data and implementation on 25 May 2018 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) „GDPR”.

Under applicable laws, you may also file a complaint to relevant authority responsible for data protection or lodge an appeal when data are used improperly. In the Republic of Poland the supervisory authority is the President of the Office for Protection of Personal Data.

Contact our data protection contact point in Poland if you have any questions or comments connected with this Privacy Policy.

e-mail: privacy.orbicobeautypl@orbico.com

9. Amendments in the Privacy Policy

The Privacy Policy is verified on current basis and updated, if necessary. The present version of the Privacy Policy was adopted on and is effective since 25/05/2018.