

PRIVACY POLICY

Table of contents:

- I. General information
- II. What is the reason and lawful basis for processing your personal data
- III. Who do we share your personal data with
- IV. Personal data retention period.
- V. Lawful basis for processing
 - V.1. Right of access to personal data
 - V.2. Right of change your personal data
 - V.3. Right of erasure of your personal data
 - V.4. Right of restriction of processing your personal data
 - V.5. The right to object
 - V.6. The right of data portability
 - V.7. Right of filing a complaint with supervisory authority
- VI. Principles

I. General Information:

In this document you will find all information about processing of your personal data by PaperConcept. This document will be referred to as „Policy”

“Controller” of your personal data is our company – PaperConcept sp. z o. o. sp. k. with a registered office at ul. Trakt Lubelski 135, 04-790 Warszawa, entered into the register of entrepreneurs kept by the District Court for the Capital City of Warsaw (Sąd Rejonowy dla m.st.Warszawy), Commercial Division XIII, under KRS number 0000646868, NIP 9522153440.

Pronoun „we” in this Policy refers to the Controller – PaperConcept.

In all matters relating to the processing of your personal data, you can contact us:

- by post using the following address: ul. Trakt Lubelski 135, 04-790 Warsaw,
- by e-mail: info@paperconcept.pl

We try to respond as quickly as possible (no later than within 14 days or in a shorter period if this is required by law).

We implement appropriate technical measures to ensure and to be able to demonstrate that processing of your personal data is performed in accordance with the current Data Protection Regulations as well as to prevent unauthorized persons from obtaining and changing your personal data.

‘Personal data’ means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier, including name, identification number, location data or online identifier, or one or more specific factors determining the physical, physiological, genetic, psychological, economic, cultural or social identity of a natural person.

II. What is the reason and lawful basis for processing your personal data

Your personal data will be processed by us primarily to perform the contract (buy –sell agreement) and to make our services available to you.

We need to process your personal data so that we can manage your customer accounts, provide you with the goods and services you want to buy and help you with any orders and refunds you may ask for.

- When you buy a product in our online store, your personal data will be processed by our sales system in order to complete the transaction.
- We will also process your data to provide you with purchased goods.
- We need your personal data to issue an invoice for the purchased goods.
- If you contact us with questions about your order, we will use your personal data to provide the answer.

- If you create an account in our online store <https://paperconcept.pl/>, your personal data will be processed to maintain your account and enable you to log in and make orders.

For the above mentioned purposes we do not need your consent. Your personal data is being processed under the statutory authorization to process personal data

Important! Providing your personal data in the order forms is always voluntary. Please bear in mind, that, if you do not provide your personal data which is marked as required, you will not be able to make an order and purchase orders in our store.

If you have made a purchase order, but you have not made a full payment (if the system enables you to use the product before making a full payment), we will be able to process your data also for claims. Also in this area, we do not need your consent for processing your personal data, because in this way we maintain our legal interest. We will also be able to process your personal data for statistical purposes and business analysis.

In addition, we may ask for your consent to process your personal data for other purposes e.g. marketing purposes (for advertising our products or products offered by our business partners, sending commercial information and newsletter to your e-mail or phone number (so-called "marketing consent").

We need your consent to process your data for marketing purposes.

Please remember that your consent is voluntary and you can always unsubscribe from it.

Our marketing activities may include, for example:

1. informing you about our new products or services, sales, loyalty programs and partner programs, and sending you invitations
2. sending or providing you with catalogs, newsletters, promotional materials and other similar materials

If you accept using your personal data for marketing purposes, we will save it in the system (to prove it has been given to us when needed)

If you give marketing consent, you will receive commercial information about our products and services (as well as products and services offered by our business partners)

If we need your personal data to be used for other purposes, we will inform you about it and ask for your acceptance.

Please remember that you may withdraw consent at any time. When you withdraw consent we will stop processing your personal data for the purpose for which you previously agreed. The withdrawal of consent does not affect the data processing that was carried out before withdrawal of consent.

III. Who do we share your personal data with

We may share your personal data with third parties (our business partners). We always ask you to accept this condition before we share your personal data. If you accept it, our business partners will have access to your personal data, but only for the purpose of processing it on our behalf and for the purposes specified by us.

In order to offer you all our services, we may share your personal data with third parties"

1. post office, courier and forwarding companies
2. payment service providers
3. web hosting companies
4. accounting and legal companies that provide services to us
5. IT companies which provide services to us

If you give consent to process your personal data for marketing purpose and receiving commercial information, your personal data may also be shared with parties which provide marketing, advertising

and promotional services to us. Your personal data, however, will not be used by these parties for marketing, sales or advertising of their goods or services.

Your personal data will not be transferred to a third country without your consent.

IV. Personal data retention period.

We will retain your personal data for the period needed to complete your orders. During our activity, PaperConcept sp. z o. o. sp. k. with a registered in Warsaw (Controller) will retain your personal data to operate our services, meet our obligations (e.g. accounting) and for statistical purposes and business analysis.

We will be processing your personal data, for which your consent was obligatory, until you withdraw this consent.

We will, however, permit processing your personal data if it is necessary for compliance with a legal obligation, even if you withdraw your consent.

V. Lawful basis for processing

You have the following rights in relation to personal data processing:

V.1. The right of access to personal data

At any time, you may ask about your personal data that is being processed by us and for what purpose we process your personal data. You may also ask us who we share your personal data with. If you find information provided in the "**Personal data retention period**" section insufficient, we will share more detailed information with you, if requested. You may also ask about your right to lodge a complaint with a supervisory authority (in regards to protection of personal data).

You may receive a copy of your personal data that is being processed by us at any time. The first copy will be sent to you free of charge. If you request the second copy, we may charge a small fee to cover administrative costs.

If you send your request for a copy of your personal data electronically and do not state that you would like to receive it in another form, we will send it via e-mail.

In case, issuing a copy of your personal data cannot take place without revealing the personal data of other persons, we will inform you that it is not possible to provide you with the requested copy.

V.2. The right of change and correction of your personal data

You may ask us to change and correct your personal data at any time when it is incorrect.

You may ask us to correct your personal data at any time, when it is incomplete.

V.3. The right of erasure of your personal data

You have the right of erasure of your personal data at any time, when:

1. The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed.
2. You object to the processing and there are no overriding legitimate grounds for the processing.
3. When you find that we process your personal data unlawfully (and this is proved and confirmed).
4. The personal data have to be erased for compliance with a legal obligation in European Union and Polish law.
5. You withdraw your consent for processing of your personal data, (if your consent was needed for personal data processing).

In all these cases, your personal data will be erased by us without undue delay. However, your demand will not be met in the following cases:

1. when further processing of your personal data will be necessary for us to be able to meet our legal obligation arising from European Union law or Polish law,
2. when further processing of your personal data is necessary for the establishment, exercise or defense of legal claims.

Please be informed that we create back-ups of our databases and information systems in order to protect personal data. If we are requested to erase your personal data, we will take all reasonable steps to ensure that your data is not available even after restoring backup system.

V.4. The Right of restriction of processing your personal data

In cases described in this section you have the right of restriction of processing your personal data. It means that we will set it in our system as well to limit the processing of your personal data in the future. You can request the restriction of your personal data in the following cases:

1. You claim that your personal data is incorrect or inaccurate. In such case we restrict processing of your personal data for a period enabling us to verify the accuracy of your personal data;
2. the processing is unlawful and you oppose the erasure of your personal data and request the restriction of its use instead;
3. we no longer need your personal data for the purposes of the processing, you require saving it in our systems for the establishment, exercise or defense of legal claims;
4. you have objected to processing of your of personal data for purposes arising from our legitimate interest- the will limit processing of your personal data after verifying whether our legitimate grounds override your legitimate grounds.

If, in the above mentioned cases, you request to limit the processing of your personal data, we will only hold and store your data. Other forms of processing will be possible when you agree to it or if the processing is necessary for the establishment, exercise or defense of legal claims; and when it is necessary to protect the rights of other natural or legal persons. We will always inform you about the restrictions on the processing of your personal data.

V.5. The right to object

You have the right to object to the processing of your personal if we use your data for statistical purposes or business analysis. We will stop processing your personal data, unless we will be able to show we have a compelling reason for doing so.

If you give a marketing consent, you can object to processing of your personal data for this purpose at any time. In such case we will stop processing your personal data immediately for this purpose.

V.6. The right of data portability

If we use automated methods to process your personal data, you have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit this data to another controller.

You have the right to request from us providing such file to another controller (indicated by you).

V.7 Right of filing a complaint with supervisory authority

If you think that processing your personal data violates your rights or for other reasons is inconsistent with Polish Law or European Union Law, you have the right to file a complaint with **Inspector General for the Protection of Personal Data**

(note: from May 25, 2018, the name of the office responsible for monitoring compliance with the principles of processing of personal data may change).

VI. Principles

This Policy is available to fulfill the obligations arising from:

1. art. 24, Act of August 29, 1997 on the Protection of Personal Data (consolidated text- June 13, 2016, Journal of Laws from 2016, item. 922),
2. art. 13, 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)
3. art. 20 section 1, Act of 18 July, 2002 on Providing Services by Electronic Means (Journal of Laws of 2017, item 1219),

4. art. 173 Telecommunications Act of 16 July 2004 (consolidated text – Journal of Laws 2017 r. item. 1907 with subsequent amendments).