

GENERAL INFORMATION

1. This document defines the rules of the Privacy Policy on the Website www.syncret.com (hereinafter referred to as "Website"). The administrator of the Website is Syncret Cyganek Spółka Jawna registered in the National Court Register by the District Court for Kraków Śródmieście in Kraków, 11th Commercial Department of the National Court Register under KRS number: 0000726685, Tax Identification Number: 6762547645, REGON: 369922720.

2. Personal data collected by the Administrator of the Website is processed in accordance with the provisions of Regulation of the European Parliament and of the Council (EU) 2016/679 of 27.04.2016 on the protection of individuals with regard to the processing of personal data and on the free flow of such data and repeal of Directive 95 / 46 / EC (general regulation on data protection) (OJ L 119, p. 1), hereinafter referred to as: GDP.

3. The Administrator of the Website makes special efforts to protect the privacy and information provided to him and regarding Users of the Website. The Administrator selects and applies appropriate technical measures, including programming and organizational measures, ensuring protection of the data being processed, in particular protecting data from unauthorized disclosure, disclosure, loss and destruction, unauthorized modification, as well as against their processing in violation applicable law.

4. The addressee of the possibility of using the Services available on the website are not children under 16 years of age. The personal data administrator does not plan to collect data on children under 16 years of age.

PERSONAL DATA - PERSONAL DATA ADMINISTRATOR

1. Personal Data Administrator is: Syncret Cyganek Spółka Jawna registered in the National Court Register by the District Court for Kraków Śródmieście in Kraków, 11th Commercial Department of the National Court Register under KRS number: 0000726685, Tax Identification Number: 6762547645, REGON: 369922720.

2. You can contact your Personal Data Administrator with regards to you personal data using e-mail: butik@syncret.com,
or per post: ul. Bracka 8, 31-005 Kraków.

DATA PROTECTION OFFICER

You can contact Rafał Surowy (The Data Protection Officer) with regards to you personal data protection via: butik@syncret.com,
or per post: ul. Bracka 8, 31-005 Kraków.

PURPOSE AND LEGAL BASIS OF PERSONAL DATA COLLECTION

The personal data administrator processes your personal data for the following purposes and scope:

a) to take action before concluding a contract at the Customer's request (e.g. setting up an Account), i.e. the data given in the registration form in the Online Store, i.e. e-mail address and username, gender; if you register when purchasing the Goods, we collect your name and data given for the purpose of completing the Order, such as your shipping address; in order to provide Services requiring an Account, such as: maintaining the history of Orders, informing about the status of

Order execution, we process the data provided in the Account and when purchasing the Goods;

b) for the purpose of providing Services not requiring an Account and purchase of Goods, i.e. browsing the web pages of the Online Store, searching for Goods, we process personal data concerning the activity in the Online Store, i.e. data concerning the content you view, Goods, session data of your device, operating system, browser, location and unique ID, IP address;

c) in order to perform the Contract of Sale of Goods (e.g. delivery of the Ordered Goods), we process personal data provided at the purchase of the Goods, such as name and surname, e-mail address, address data, payment data, and if you make a purchase through an Account, additionally established password;

d) for the purpose of statistics on the use of particular functionalities available in the On-line store, facilitating the use of the On-line store and ensuring the in-format safety of the On-line store, we process personal data concerning the activity in the On-line store and the amount of time spent on each of the subpages in the On-line store, your search history, location, IP address, device ID, data concerning your Internet browser and operating system;

e) for the purpose of determining, asserting and enforcing claims and defending against claims in court proceedings and other enforcement authorities, we may process personal data provided at the time of purchase of Goods or creation of an Account and other data necessary to prove the existence of a claim or which arises from a legal requirement, court order or other legal procedure;

f) for the purpose of dealing with complaints, grievances and requests and for answering questions, we process the personal data provided in the contact form, complaints and requests or to answer questions in another form and certain personal data provided in the Account as well as data relating to the Order and/or other Services provided by us which give rise to complaints, grievances or requests and data contained in the supporting documents attached to complaints, grievances and requests;

g) for the purpose of marketing our Goods and Services, as well as the Services of our partners, including remarketing, for this purpose we process personal data provided when you create and update your Account, data relating to activity in the Online Shop, including orders that are recorded and stored via cookies, and in particular the history of Orders, search history, clicks on the Online Shop, login and re-start dates, history and activity relating to our communications. In the case of remarketing, we use the activity data in order to reach our marketing messages outside the Online Shop and we use external providers for this purpose. These services consist of displaying our messages on websites other than the Online Shop.

h) for the purpose of market research and opinions by us or our partners, i.e. information about the Order, data provided in the Account or when purchasing the Goods, e-mail address. Data collected in the course of market research and opinion polling is not used by us for advertising purposes. You will find precise indications in the survey information or at the place where you enter your data.

Categories of relevant personal data. The controller processes the following categories of relevant personal data:

Ordering data; contact details;
data concerning activity on the Website;
data concerning Orders on the Website;

data concerning complaints and requests;
data concerning marketing services.

VOLUNTARY PERSONAL DATA

Providing your required personal data is voluntary and is a condition for the provision of personal data by the Administrator via the Website.

DATA PROCESSING TIME

1. Personal data will be processed for the period necessary to execute orders, services, marketing activities and other services performed for the User. Personal data will be removed in the following cases:
 - a) when the data subject asks for their removal or withdraws their consent;
 - b) when the data subject does not take action for over 10 years (inactive contact - counted from January 1, since the last contact); after getting information that the stored data is out of date or inaccurate.
2. Some data in the field of: e-mail address, name and surname, may be stored for the next 3 years for evidence purposes, consideration of complaints, complaints and claims related to services provided by the Website - these data will not be used for marketing purposes.
3. Data regarding orders for paid services, contests and loyalty programs will be kept for 5 years from the date of order delivery.
4. Data regarding non-logged Users are stored for a period of time corresponding to the lifecycle of cookies stored on the devices or until they are deleted by the User on the User's device.
5. Your personal data regarding preferences, behaviors and selection of marketing content can be used as a basis for making automated decisions to determine the sales possibilities of the Website.

RECIPIENTS OF PERSONAL DATA

We provide your personal data to the following categories of recipients:

- a) state authorities, such as the prosecutor's office, the Police, GIODO, the President of UOKiK, if they ask us for it,
 - b) service providers that we use to run the Website, for example in order to fulfill an order.
- Depending on the contractual arrangements and circumstances, these entities either act on our behalf or determine the purposes and means of processing them themselves.

THE RIGHTS OF THE DATA SUBJECT

1. Based on the RODO, you have the right to:
 - a) request access to your personal data;
 - b) request correction of your personal data;
 - c) request removal of your personal data;
 - d) request to limit the processing of personal data; object to the processing of personal data;
 - e) request for moving personal data.

2. The Administrator of personal data without undue delay - and in any case within one month of receiving the request - provides you with information about the actions taken in connection with the request you have made. If necessary, the monthly deadline may be extended by another two months due to the complexity of the request or the number of requests.
3. In any event, the Personal Data Administrator will inform you of such extension within one month of receiving the request, stating the reasons for the delay.

THE RIGHT OF ACCESS TO PERSONAL DATA

1. You have the right to obtain from the Administrator personal information whether your personal data is processed. If the Administrator processes your personal data, you have the right to:
 - a) access to personal data;
 - b) obtaining information about the purposes of processing, categories of personal data being processed, the recipients or categories of recipients of this data, the planned period of storage of your data or the criteria for determining this period, about your rights under the RODO and the right to lodge a complaint to the supervisory authority data on automated decision-making, including profiling and safeguards applied in connection with the transfer of these data outside the European Union;
 - c) obtain a copy of your personal data.
2. If you want to request access to your personal data, please submit your request to: butik@syncet.com

THE RIGHT TO REQUEST A RESTRICTION OF PERSONAL DATA PROCESSING

1. You have the right to request the Administrator to immediately rectify your personal data when:
 - a) you issue the correctness of your personal data—the Administrator should restrict processing of your data for the time necessary to check the correctness of the data;
 - b) Your personal data has been processed unlawful, and instead of removing your personal data you request a restriction on the processing of your personal data;
 - c) Your personal data is no longer processed but it is needed in order to establish, pursue or defend your claims;
 - d) when you object to the processing of your personal data until it is determined whether the legitimate interests of the Administrator take precedence over the grounds for your objection.
2. If you want to request a restriction on the processing of your personal data, please submit your request to: butik@syncet.com

THE RIGHT TO OBJECT TO THE PROCESSING OF PERSONAL DATA

1. You have the right to object at any time to the processing of your personal data, including profiling, in connection with:
 - a) processing necessary for the performance of a task carried out in the public interest or processing necessary for purposes arising from legitimate interests pursued by the Administrator of personal data or a third party;
 - b) processing for direct marketing purposes.

2. If you want to object to the processing of your personal data, please submit your request to: butik@syncret.com.

THE RIGHT TO REQUEST THE TRANSFER OF PERSONAL DATA

1. You have the right to receive from the Administrator personal data of your personal data in a structured, commonly used machine-readable format and send them to another administrator of personal data.
2. You can also request that the Personal Data Administrator send your personal data directly to another administrator (if it is technically possible).
3. If you want to request the transfer of your personal data, please submit your request to: butik@syncret.com

THE RIGHT TO WITHDRAW CONSENT

1. You can withdraw your consent to the processing of your personal data at any time.
2. Withdrawal of consent to the processing of personal data does not affect the lawfulness of processing made on the basis of your consent before its withdrawal.
3. If you want to withdraw your consent to the processing of your personal data, please submit your request to: butik@syncret.com

COMPLAINT TO THE SUPERVISORY BODY

1. If you believe that the processing of your personal data violates the RODO, you have the right to submit a complaint to the supervisory authority, in particular in the Member State of your habitual residence, your place of work or the place where the alleged infringement was committed.
2. In Poland, the supervisory body within the meaning of the RODO is the General Inspector for Personal Data Protection (GIODO).

COOKIES

This Policy applies to "cookies" and refers to websites operated by Syncret Cyganek Spółka Jawna with its registered office in Kraków (31-005), 8 Bracka Street (hereinafter referred to as the Operator).

WHAT ARE “COOKIES” ?

While browsing the Internet pages of the Website, "cookies" are used, hereinafter referred to as Cookies, i.e. small text information that is stored in your terminal equipment in connection with the use of the Website. These files allow you to identify the software used by you and adapt the Website individually to your needs. "Cookies" usually contain the name of the domain from which they originate, their storage time on the device and the assigned value.

WHAT ARE “COOKIES” USED FOR?

The “cookies” are used in order to:

a) adjust the content of the Website's websites to the User's preferences and optimize the use of the websites; in particular, these files allow

recognizing the Service User's device and properly display the website, adjusted to his individual needs

b) create statistics that help to understand how Service Users use the websites to improve their structure and content

c) maintaining the Service User session (after logging in), thanks to which the User does not have to re-enter his login and password on each subpage of the Service.

TYPES OF “COOKIE” FILES WE USE

We use two types of cookies: session cookies and persistent cookies. Session cookies: they are stored on your device and remain there until the end of the browser session. The saved information is then permanently deleted from the memory of your device. The mechanism of session cookies does not allow you to download any personal data or any confidential information from your device. Persistent cookies: they are stored on your device and remain there until they are deleted. Ending the session of a given browser or turning off the device does not delete them from your device. The mechanism of persistent cookies does not allow you to download any personal data or any confidential information from your device.

THE FOLLOWING TYPES OF COOKIES ARE USED ON THE WEBSITES:

(a) 'necessary' cookies to enable the use of services available on the websites, e.g. authentication cookies used for services requiring authentication on the websites

(b) cookies for security purposes, e.g. used to detect misuse of authentication on websites

(c) 'performance' cookies, enabling the collection of information on how to use websites

(d) 'functional' cookies, enabling 'memory' selected by

User settings and personalization of the user interface, e.g. in terms of the selected language or region from which the user comes from, font size, page appearance Internet, etc.

e) "advertising" cookies, enabling the provision of content to Users advertising more suited to their interests

(f) 'Analytical' internet analysis cookies enable a better understanding of how user interacts with the content of websites to better organize the layout of our site. They collect information about how visitors use our site, the type of site from which they have been redirected, and the number of visits and duration of visitors to the site. This information does not record specific personal data of the user, but used to compile statistics use the site on an aggregate basis. For this purpose, we use Google Analytics.

COOKIES OF INDEPENDENT COMPANIES ON THIS WEBSITE'S INTERNET OPERATOR

Google Analytics - web analytics cookies collect information about your use of our website, the type of website from which you have been redirected, the number of visitors and the duration of your visit to the website. This information does not record any specific personal data of the User, but is used to compile statistics about the use of the website on an aggregate basis.

OTHER COOKIES

Due to the differences in the scope of the Cookies used, the descriptions relating to other cookies should be specified separately by the entity below:

Facebook - the website uses cookies that store the browser's id and an encrypted version of the user's identity when logged on to Facebook. These cookies allow us to analyse the number of visits

made by users redirected to www.syncret.com from the links published on Facebook and to adapt the communication and the offer to the needs of visitors.

More information is available on the website: <https://www.facebook.com/policies/cookies/>.

LEGAL BASIS FOR PROCESSING

The above data is collected on the basis of the user's consent (Section 6.1(a) of the GDR), for the purpose of performing the contract or to take action before concluding the contract (Section 6.1(b) of the GDR). We may also process data on the basis of the legitimate purpose of the controller (PAR 6 point.1(f) of the GDR).

DO COOKIES CONTAIN PERSONAL DATA

Personal data collected using "cookies" can only be collected for the purpose of performing specific functions for the user. Such data is encrypted in a way that prevents access by unauthorized persons.

HOW LONG WILL THE COOKIES BE PROCESSED

If you consent to the storage of cookies every 365 days from the date you consent to the storage of cookies, we will ask you to agree to the storage of cookies again during your next visit to our sites.

DELETING COOKIES

By default, web browsing software allows you to place "cookies" on your device. These settings can be changed in such a way as to block the automatic handling of "cookies" in the settings of your web browser or inform about each time they are sent to your device. Detailed information about the possibilities and ways of handling "cookies" are available in the software settings (web browser).

Internet Explorer (<https://support.microsoft.com/pl-pl/help/17441/windows-internet-explorer-change-reset-setting>)

Firefox (<https://support.mozilla.org/pl/kb/firefox-opcje-preferencje-i-ustawienia>)

Opera (<https://help.opera.com/pl/touch/settings/>)

Chrome (<https://support.google.com/accounts/answer/3118621?hl=pl>)

Restricting the use of cookies may affect some of the functionalities available on the website.

SECURITY FEATURES WE USE ON THE WEBSITE

The Operator's websites are equipped with security measures to protect the data under our control against loss, misuse or modification. We undertake to protect any information disclosed to us by Clients in accordance with security and confidentiality standards. The website operator offers users the possibility to resign from receiving advertising materials and ordered newsletters. The Operator provides Users with an option to remove information about themselves from databases and allows them to stop receiving information sent by e-mail.