

## **PRIVACY AND COOKIE POLICY OF ICB PHARMA**

### **1. GENERAL PROVISIONS**

**1.1.** This privacy policy (hereinafter: "Policy") is of an informative nature and helps Users understand what data we process, for what purpose we process them and how we use them.

**1.2.** Within the meaning of 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, the Controller of the personal data collected through the Online Shop or other channels of communication with the User is ICB Pharma Tomasz Świętosławski, Paweł Świętosławski Spółka Jawna with its registered office in Jaworzno at ul. Moździerzowców 6a (address for service: ul. Stanisława Lema 10, 43-600 Jaworzno), entered into the register of entrepreneurs of the National Court Register, under KRS no. 0000150038; NIP (Tax Identification No.): 6321797732; REGON: 276916802 – hereinafter referred to as the "Controller" and Seller.

**1.3.** Personal Data are all details which could identify Users, for instance full name, phone number, email address and residence address or address for delivery of purchases made through the platform of our online shop. Processing of Personal Data refers to all activities and operations on personal data (e.g. collection, storage or analysis for the provision of services; transfer to other entities for the purpose of completing orders).

**1.4.** In order to use the services and online tools, Users are required to read the provisions of this Privacy Policy.

**1.5.** The Controller uses its best endeavours to protect the interests of data subjects, and in particular ensures that the data it collects are processed in accordance with the law; are collected for the indicated lawful purposes and are not further processed contrary to those purposes; are correct in substance and adequate for the purposes for which they are processed and stored in a form enabling identification of persons they concern no longer than necessary to achieve the purpose of processing.

**1.6.** Due to the importance of User privacy, the Controller protects Users who shared their Personal Data with the Controller via websites such as Facebook, email, etc.

**1.7.** The principles of protection and use of Personal Data by Facebook can be found e.g. at <https://www.facebook.com/policy.php>.

### **2. PURPOSE AND SCOPE OF COLLECTION AND PROCESSING, DATA RECIPIENTS**

**2.1.** In each case, the purpose, scope and recipients of the data processed by the Controller follow from consent of a given User or provisions of law and are defined more precisely as a result of actions taken by the User.

**2.2.** Provision of personal data is voluntary; however, failure to provide the data marked as required for provision of the service will render provision of the service impossible. Failure to provide other optional details may hinder provision of the service.

**2.3.** The most common purposes of collection and processing of Personal Data of the Users by the Controller:

- a. organisation of competitions, in particular selection of competition winners and award of prizes,
- b. direct marketing of the Controller's own products of services, including promotional campaigns,
- c. User service, including communication with Users also with the use of a contact form,
- d. surveys, only with the consent of Users,
- e. data provided for the purpose of recruitment.

**2.4.** In the case of other purposes, Personal Data of the Users may be processed based on voluntarily given consent and the applicable provisions of law.

**2.5.** Possible recipients of Personal Data of the Users:

a. third parties, for the purpose of provision of services by these parties for the benefit of the Controller, where these parties process data on the basis of an agreement with the Controller and only in accordance with instructions of the Controller and are obliged to apply the principles of personal data protection, which is verified by ICB Pharma.

b. entities authorised to obtain the data under the applicable law, e.g. law enforcement authorities.

c. in certain cases recipients from third countries i.e. countries outside the European Union, e.g. if it is necessary for provision of Services to Users or it depends on another legal basis. Information on this subject can be found within information on provision of individual Services.

**2.6.** The Controller may make anonymised data (i.e. data which do not identify specific users) available to external service providers, trusted partners or marketing agencies for the purpose of better evaluation of the attractiveness of advertisements and services to the Users, improvement of the overall quality and efficiency of services provided by the Controller or specified entities.

**2.7.** The Controller may process the following Personal Data of the Users: full name, correspondence address, email address, phone number and other data if required by the provisions of law by completing the data contained in application forms which enable organisation of advertising campaigns/competition by the Controller.

**2.8.** Provision of Personal Data may be necessary for conclusion and performance of a Service Agreement. In each case, the scope of data required for conclusion of an agreement is indicated in the Regulations of the given service.

**2.9.** In the case of processing data for the purpose of direct marketing of the Controller's own products or services, the legal basis for the processing consists in legitimate purposes of the Controller.

**2.10.** The period over which personal data are stored and processed amounts to:

a. 5 years for situations provided for in items 2.2(a)–2.2(d)

b. 1 year for situations provided for in item 2.2(e)

### **3. RIGHT TO CONTROL, ACCESS AND CORRECT OWN DATA**

**3.1.** Users have the right of access to their Personal Data and correct them.

**3.2.** All persons have the right to exercise their rights under the Personal Data Protection Act, in particular the right of access to own Personal Data, the right to request rectification thereof, restrict the processing thereof and erase them as well as the right to object in cases defined in the provisions of the Act.

**3.3.** If your Personal Data are processed on the basis of consent, you may additionally exercise the right to withdraw consent in the scope in which they are processed on this basis. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

**3.4.** If Personal Data are processed based on consent or as part of the provided service, Users may also exercise the right to personal data portability, i.e. the right to receive personal data from the Controller in a structured, commonly used and machine-readable format. The Users may transmit those data to another Data Controller.

**3.5.** In order to exercise the above-mentioned rights, Users should contact the Controller in accordance with Section 6.

**3.6.** In the event that Users should detect a breach, they have the right to lodge a complaint with a supervisory authority responsible for personal data protection.

#### **4. TRADE INFORMATION**

**4.1.** The Controller has the technical ability to communicate with Users in a remote manner (e.g. by email).

**4.2.** Trade information connected with commercial activity of the Controller or entities co-operating with the Controller may be transmitted only with the Users' consent, e.g. for the purpose of performance of the Newsletter Service Agreement.

**4.3.** For performance of the Newsletter Service Agreement, Personal Data may also be processed for the purpose of marketing products or services of entities with which the Controller co-operates.

#### **5. COOKIES**

**5.1.** Web pages of the Controller use a technology which stores and accesses information on the User's computer or another device connected to the Internet (in particular with the use of cookies) for the purpose of ensuring the User maximum comfort of use of these pages, as well as for statistical purposes and to adjust the advertising content – provided by the Controller's partners and advertisers, among others – to the User's interests.

**5.2.** Cookies constitute computer data, in particular text files stored on the end device of Users of the Website and are intended for using the pages of the Website. Cookies usually contain the name of the website they originate from, the duration of storage on the end device and a unique number.

**5.3.** The operator of the Website is the entity placing cookies on the Website user's end device and obtaining access thereto.

**5.4.** Cookies are used for the following purposes:

**a.** creation of statistics which help to understand how Users of the Website use the web pages, which enables improvement of their structure and content;

**b.** maintenance of the Website User's session (after login), owing to which the User does not have to re-

enter their login and password on each page of the Website;

c. profiling the User in order to display tailored content within advertising networks, in particular the Google network.

**5.5.** The Website makes use of two main types of cookies: session cookies and persistent cookies. Session cookies are temporary files stored on the User's end device until the User has logged out, left the website or closed the software (web browser). Persistent cookies are stored on the User's end device for a time defined in the cookie parameters or until they are removed by the User.

**5.6.** Software for browsing websites (web browser) usually allows storage of cookies on the User's end device by default. Users of the Website may change this setting. Web browsers enable deletion of cookies. It is also possible to have cookies blocked automatically. Detailed information can be found in the help section or documentation of the web browser.

**5.7.** Limiting the use of cookies may affect some functionalities available on pages of the Website.

**5.8.** The cookies placed on the Website User's end device may also be used by the advertisers and partners co-operating with the Website operator.

**5.9.** We advise that you read the privacy policies of these companies to learn about the principles of using cookies for statistical purposes: [Google Analytics Privacy Policy](#)

**5.10.** Cookies may be used by advertising networks, in particular the Google network, to display advertisements tailored to the manner in which the User uses the Website. For this purpose, they may save information on user navigation path or duration of stay on a given page.

**5.11.** As regards information on user preferences collected by the Google advertising network, the User may view and edit the information from cookies with the use of the tool found at <https://www.google.com/ads/preferences/>.

## **6. CONTACT WITH THE CONTROLLER**

**6.1.** Users can directly contact the Controller by sending a relevant message in writing or electronically to the following address: [rodo@icbpharma.com](mailto:rodo@icbpharma.com)

**6.2.** The Controller stores correspondence with the User for statistical purposes and for the purpose of the best and fastest response to inquiries possible, as well as in the scope of handling complaints and possible decisions on administrative interventions in a given Account based on reports. The addresses and data collected in this manner will not be used for communication with the User for any purpose other than handling the report.

## **7. SAFEGUARDS**

**7.1.** The Controller has taken technical and organisational measures to ensure protection of the processed Personal Data that is adequate for threats and categories of the data included in the protection, and in particular protects data against disclosure thereof to unauthorised persons, the data being taken by unauthorised persons, processing the data in violation of the applicable laws as well as modification, loss, damage and destruction.

**7.2.** Entities associated with the Controller, external service providers are obliged to manage data in accordance with the applicable legal regulations, as well as requirements in the scope of security and

privacy protection.

## **8. FINAL PROVISIONS**

**8.1.** The Controller reserves the right to change the Policy in the future – this might happen for compelling reasons such as:

**a.** amendment of the applicable provisions, in particular in the scope of protection of Personal Data, the telecommunications law, services provided electronically and provisions regulating consumer rights, which affect our rights and obligations or rights and obligations of the User;

**b.** development of functionalities or Electronic Services dictated by development of internet technology, including use/implementation of new technological or technical solutions, which affects the scope of the Policy.

**8.2.** In each case, the Controller shall post information on changes to the Policy on its website. Each new version of the Policy will be published with a new date.

**8.3.** In the event of doubts or discrepancies between the Policy and consent given by the User, notwithstanding provisions of the Policy, our actions are always taken or the scope thereof is determined based on voluntary consent of the User or provisions of the law. This document is of a general, purely informative nature (it does not constitute an agreement or regulations).

**8.4.** This version of the Policy applies as of 25 May 2018.