

PRIVACY POLICY

§ 1 DEFINITIONS

1. **Administrator** - Zbigniew Ciemniowski Przetwórstwo Rolno-Spożywcze with headquarters in Jankowice, Poland.
2. **Personal data** - all information about an identified natural person or identifiable by one or more specific factors defining physical, physiological, genetic, mental, economic, cultural or social identity, including device IP, location data, internet identifier and information collected through cookies and other similar cookies technology.
3. **Policy** - this Privacy Policy.
4. **GDPR** - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to data processing personal data and on the free movement of such data, and repealing the Directive 95/46 / EC.
5. **Website** - a website run by the Administrator at the address www.treenuts.de.
6. **User** - any natural person visiting the Website or using one or several services or functionalities described in the Policy.

§ 2

OBJECTIVES AND LEGAL BASIS FOR DATA PROCESSING ON THE WEBSITE USING THE WWW.TREENUTS.DE WEBSITE

1. In connection with the User's use of the Website, the Administrator collects data in to the extent necessary to provide individual services offered, and information about the User's activity on the Website. Details are described below the principles and purposes of processing personal data collected during the use Website by the User.

§ 3

OBJECTIVES AND LEGAL BASIS FOR DATA PROCESSING ON THE WEBSITE

1. Personal data of all persons using the Website (including IP address or other addresses identifiers and information collected via cookies or other files similar technologies), and who are not registered Users (i.e. persons without a profile on the Website) are processed by the Administrator:
 - 1.1. in order to handle purchases made without registration on the Website - then the legal basis for processing is the necessity of processing to be performed contracts (Article 6 (1) (b) of the GDPR);

- 1.2. in order to handle complaints - then the legal basis for processing is the necessity of processing to perform the contract (Article 6 (1) (b) of the GDPR);
- 1.3. for analytical and statistical purposes - then the legal basis processing is the legitimate interest of the Administrator (Article 6 (1) (f) of the GDPR) consisting in conducting analyzes of Users' activity, as well as their preferences to improve the functionalities used and the services provided;
- 1.4. in order to possibly establish and pursue claims or defend against them - the legal basis for processing is the Administrator's legitimate interest (Article 6 paragraph 1 letter f of the GDPR) consisting in the protection of his rights;
- 1.5. for marketing purposes of the Administrator and other entities - rules the processing of personal data for marketing purposes is described in the "MARKETING" section. The User's activity on the Website, including his personal data, is recorded in logs system (a special computer program for storing chronological record containing information about events and activities related to IT system used to provide services by the Administrator). Collected in logs, information processed in connection with the provision of services. The administrator processes them also for technical purposes, in particular, the data may be temporarily stored and processed to ensure the security and proper functioning of the systems IT, e.g. in connection with making backup copies, testing changes in IT systems, detecting irregularities or protecting against fraud i attacks.

§ 4 PLACING ORDERS

1. Placing an order (purchase of goods or services) by the Website User is associated with the processing of his personal data. Providing data marked as mandatory is required to accept and service the order, and failure to provide them results in the lack of its implementation. Providing other data is optional.
2. Personal data is processed:
 - 2.1. order to fulfill the order placed - the legal basis for processing is the necessity of processing to perform the contract (Article 6 (1) (b) of the GDPR); in the scope of optional data, the legal basis for processing is consent (Article 6 (1) (a) of the GDPR);
 - 2.2. in order to fulfill the statutory obligations incumbent on the Administrator, resulting in particular from tax regulations and provisions on accounting - the legal basis for processing is the legal obligation (Article 6 par. 1 lit. c GDPR);
 - 2.3. for analytical and statistical purposes - the legal basis for processing is the legitimate interest of the Administrator (Article 6 (1) (f) of the GDPR) consisting conducting analyzes of Users' activity on the Website, as well as their preference purchasing in order to improve the functionalities used;

- 2.4. in order to possibly establish and pursue claims or defend against them - the legal basis for processing is the Administrator's legitimate interest (Article 6 paragraph 1 lit. f GDPR) consisting in the protection of his rights.

§ 5

CONTACT FORMS

1. The administrator provides the ability to contact him using electronic contact forms. Using the form requires an application personal data necessary to contact the User and provide response to the inquiry. The User may also provide other data to facilitate contact or handling your inquiry. Providing data marked as mandatory is required to accept and handle inquiries, and failure to do so results in the lack of handling options. Providing other data is voluntary.
2. Personal data is processed:
 - 2.1. in order to identify the sender and handle his inquiry sent by the provided form - the legal basis for processing is necessity processing for the performance of a service contract (Article 6 (1) (b) of the GDPR);
 - 2.2. for analytical and statistical purposes - the legal basis for processing is the legitimate interest of the Administrator (Article 6 (1) (f) of the GDPR) consisting in keeping statistics of inquiries submitted by Users via Website in order to improve its functionality.

§ 6

MARKETING

1. The Administrator processes Users' personal data in order to carry out activities marketing, which may include:
 - 1.1. displaying marketing content to the User that is not adapted to his preferences (contextual advertising);
 - 1.2. displaying marketing content corresponding to the User interests (behavioral advertising);
 - 1.3. sending e-mail notifications about interesting offers or content, which in some cases contain commercial information;
 - 1.4. conducting other types of activities related to marketing direct goods and services (sending commercial information by road electronic and telemarketing activities).

§ 7

CONTEXTUAL ADVERTISING

1. The Administrator processes Users' personal data for marketing purposes in connection with directing contextual advertising to Users (i.e. advertising that is not adjusted to the

User's preferences). The processing of personal data takes place then in connection with the implementation of the legitimate interest of the Administrator (art.6 par.1 lit.f GDPR).

§ 8

BEHAVIORAL ADVERTISING

1. The Administrator processes Users' personal data, including personal data collected via cookies and other similar technologies, for marketing purposes in connection with targeting behavioral advertising to Users (i.e. advertising that is tailored to the User's preferences). Data processing personal data also includes profiling of Users. Usage personal data collected through this technology for marketing purposes, in particular in the promotion of services and goods of third parties, is carried out based on the legitimate interest of the administrator and only on condition that the User consented to the use of cookies. Consent to use cookies can be expressed through the appropriate configuration of the browser, and can also be withdrawn at any time, in particular by clearing the cookie history and disabling cookies in the browser settings.
2. This consent may be withdrawn at any time.

§ 9

DIRECT MARKETING

1. If the User has consented to receive marketing information for via e-mail, SMS and other means of electronic communication, data User's personal data will be processed for the purpose of sending such information. Basis data processing is the Administrator's legitimate interest in shipping marketing information within the limits of the consent granted by the User (marketing direct). The user has the right to object to the processing of data for the purposes of direct marketing, including profiling. The data will be stored for this purpose for the duration of the legitimate interest of the Administrator, unless The user will object to receiving marketing information.

§ 10

SOCIAL NETWORK

1. The administrator processes personal data of Users visiting profiles Administrator carried out in social media (Facebook, Instagram, Google+). These data are processed only in connection with keeping the profile, including for the purpose informing Users about the Administrator's activity and promoting various the type of events, services and products, as well as to communicate with users for through the functionalities available on social media. Basis the legal processing of personal data by the Administrator for this purpose is his legitimate interest (Article 6 (1) (f) of the GDPR) consisting in promoting your own brand and building and maintaining a brand community.

§ 11

MOBILE APPLICATIONS

1. The Administrator processes Users' personal data also for the purpose of enabling using the services offered on the Website, as well as additional services for via mobile applications. Users' data is processed for the purpose of registration and using mobile applications. The legal basis for data processing is including necessary to perform the contract (Article 6 (1) (b) of the GDPR).
2. By means of mobile applications, the User may in particular: browse Website assortment, place orders and make payments for them, read the information provided in the mobile application and use other functionalities available in the mobile application. The administrator informs that due to restrictions technical mobile application does not provide the possibility to use all of them Website functionalities that are available through the Website.

§ 12

COOKIES AND SIMILAR TECHNOLOGY

1. Cookies are small text files installed on the User's device browsing the Website. Cookies collect information that facilitates the use of the website internet - e.g. by remembering the User's visits to the Website and activities performed by him.

§ 13

"SERVICE" COOKIES

1. The administrator uses the so-called service cookies primarily for the purpose providing the User with services provided electronically and improving the quality these services. Therefore, the Administrator and other entities providing for him analytical and statistical services use cookies by storing information or by accessing information already stored in the telecommunications device end user (computer, telephone, tablet, etc.). Cookies used in to this end include:
 - 1.1. cookies with data entered by the User (session ID) for the duration of the session (user input cookies);
 - 1.2. authentication cookies used for demanding services authentication for the duration of the session (authentication cookies);
 - 1.3. cookies used to ensure security, e.g. used for detection of fraud in the field of authentication (user centric security cookies);
 - 1.4. session cookies for multimedia players (e.g. cookies flash player), for the duration of the session (multimedia player session cookies);
 - 1.5. persistent cookies used to personalize the User interface on time session duration or slightly longer (user interface customization cookies),
 - 1.6. cookies used to remember the contents of the basket for the duration sessions (shopping cart cookies);

- 1.7. cookies used to monitor traffic on the website, i.e. data analytics, including Google Analytics cookies (these are files used by Google for the purpose of analyzing the way the User uses the Website, to creating statistics and reports on the functioning of the Website). Google doesn't uses the collected data to identify the User or does not link these information to enable identification. Detailed information on the scope of i the principles of data collection in connection with this service can be found under link: <https://www.google.com/intl/pl/policies/privacy/partners>.

§ 14

"MARKETING" COOKIES

1. The administrator also uses cookies for marketing purposes, including the connection with targeting Users with behavioral advertising. For this purpose, the Administrator stores information or accesses information already stored at the User's telecommunications end device (computer, telephone, tablet, etc.). The use of cookies and personal data collected through them in marketing purposes, in particular in the promotion of services and goods third parties, requires the consent of the User. This consent may be given through the appropriate configuration of the browser, and can also stay at any time withdrawn, in particular by clearing the cookie history and turning off cookies in the browser settings.

§ 15

PERIOD OF PROCESSING OF PERSONAL DATA

1. The period of data processing by the Administrator depends on the type of provided service and purpose of processing. As a rule, the data is processed for the duration of the service services or performance of the order, until the consent or notification is withdrawn effective objection to data processing in cases where the basis is legal data processing is the legitimate interest of the Administrator.
2. The data processing period may be extended in the event that the processing it is necessary to establish and pursue any claims or defend against them, a after that time only if and to the extent that it will be required by the regulations rights. After the expiry of the processing period, the data is irreversibly deleted or anonymized.

§ 16

USER RIGHTS

1. Data subjects have the following rights:
 - 1.1. The right to information about the processing of personal data - on this on the basis of the person making such a request, the Administrator provides information about processing of personal data, including in particular the

- purposes and grounds legal processing, the scope of data held, entities to whom the data is processed personal data are disclosed and the planned date of their removal;
- 1.2. The right to obtain a copy of the data - on this basis, the Administrator transfers a copy of the processed data relating to the person submitting the request;
 - 1.3. The right to rectify - on this basis, the Administrator removes any non-conformities or errors regarding the processed personal data, and complete or update them if they are incomplete or have changed;
 - 1.4. The right to delete data - on this basis, you can request deletion data the processing of which is no longer necessary to achieve any of the the purposes for which they were collected;
 - 1.5. The right to limit processing - on this basis, the Administrator ceases to operate on personal data, with the exception of operations on which the data subject has consented to and their storage, in accordance with the adopted retention rules, or until the reasons for the limitation cease to exist data processing (e.g. a decision of the supervisory authority will be issued, permitting further data processing);
 - 1.6. The right to transfer data - on this basis, to the extent to which the data are processed in connection with the concluded contract or consent, the Administrator issues the data provided by the data subject in the allowing them to be read by a computer. It is also possible to request sending these data to another entity - provided, however, that they exist in this regard, the technical possibilities both on the part of the Administrator and this another entity;
 - 1.7. The right to object to data processing for purposes marketing - the data subject may object at any time the processing of personal data for marketing purposes, without necessity the reasons for such objection;
 - 1.8. The right to object to other purposes of data processing - a person, the data subject may object to data processing at any time on the basis of the Controller's legitimate interest (e.g. for the purposes of analytical or statistical or for reasons related to the protection of property). The objection in this respect should contain a justification and is subject to assessment Administrator;
 - 1.9. The right to withdraw consent - if the data is processed on the basis of consent the data subject has the right to withdraw it at any time, however does not affect the lawfulness of the processing carried out prior to its withdrawal consent;
 - 1.10. Right to complaint - if it is found that data processing personal data violates the provisions of the GDPR or other data protection regulations personal data, the data subject may submit a complaint to the President of the Office Personal Data Protection.
2. An application regarding the exercise of the rights of data subjects may be submitted:
 - 2.1. in writing to the following address: Zbigniew Ciemniowski Przetwórstwo Rolno-Spożywcze, ul. Dzika 23, 43-215 Jankowice;
 - 2.2. by e-mail to the following address: biuro@treenuts.pl.
 3. The application should, if possible, precisely indicate what it concerns request, i.e. in particular:

- 3.1. what right does the person submitting the application want to use (e.g. law to receive a copy of the data, the right to delete data, etc.);
 - 3.2. what processing process the request concerns (e.g. the use of a specific services, activity on a specific website, receiving a newsletter containing commercial information to a specific email address, etc.);
 - 3.3. what processing purposes the request relates to (e.g. marketing purposes, purposes analytical, etc.).
4. If the Administrator is unable to determine the content of the request or identify the person submitting the application based on the submitted application, will ask the applicant for additional information.
 5. The answer to the applications will be given within one month of its receipt. IN if it is necessary to extend this deadline, the Administrator will inform the applicant about the reasons for such an extension.
 6. The answer will be given to the e-mail address from which the application was sent, and to in the case of applications sent by letter, by regular mail to the address indicated by the applicant, unless the content of the letter indicates the will to receive feedback to the e-mail address (in this case, please enter your e-mail address).

§ 17

DATA RECIPIENTS

1. In connection with the provision of services, personal data will be disclosed to external entities, including in particular suppliers responsible for the operation of systems IT companies, entities such as banks and payment operators, service providers accounting, legal, auditing, consulting services, couriers (in connection with the implementation of orders), marketing agencies (in the field of marketing services);
2. If the User's consent is obtained, his data may also be shared with other entities for their own purposes, including marketing purposes.
3. The Administrator reserves the right to disclose selected information regarding User to competent authorities or third parties who submit a request for granting such information, on the appropriate legal basis and in accordance with the provisions of applicable law.

§ 18

TRANSFER OF DATA OUTSIDE EEA

1. The level of personal data protection outside the European Economic Area (EEA) differs from that provided by European law. For this reason The administrator transfers personal data outside the EEA only when it is necessary, and with ensuring an appropriate level of protection, primarily through:

- 1.1. cooperation with entities processing personal data in countries, w for which a relevant decision of the European Commission has been issued;
 - 1.2. use of standard contractual clauses issued by the Commission European;
 - 1.3. application of binding corporate rules approved by the competent authority supervisory authority;
 - 1.4. in the case of data transfer to the USA - cooperation with entities participating in the Privacy Shield program, approved by decision of the European Commission.
2. The administrator always informs about the intention to transfer personal data outside
 3. EEA at the stage of their collection.

§ 19

SECURITY OF PERSONAL DATA

1. The administrator conducts a risk analysis on an ongoing basis to ensure that the data personal data are processed by him in a safe manner - ensuring, above all all that only authorized persons have access to the data and only to the extent that what it is necessary for the tasks they perform. The administrator takes care of that all operations on personal data are recorded and performed only by authorized employees and associates.
2. The administrator takes all necessary actions to also its subcontractors and other cooperating entities guaranteed the application of appropriate measures security whenever they process personal data on request Administrator.

§ 20

CONTACT DETAILS

1. Contact with the Administrator is possible via the e-mail adres:s biuro@treenuts.pl or correspondence address Zbigniew Ciemniowski Przetwórstwo Rolno-Spożywcze, ul. Dzika 23, 43-215 Jankowice, Poland.