



PRIVACY POLICY

I. Details concerning the Personal Data Controller

We kindly inform you that the Controller of your personal data is the company: Harper Hygienics S.A., with its registered office at Aleje Jerozolimskie 96, 00-807 Warsaw, entered into the register of enterprises of the National Court Register kept by the District Court for the capital city of Warsaw, XII Commercial Division of the National Court Register with National Court Register no. 0000289345, Tax ID no. 521-012-05-98, e-mail address: kontakt@harperhygienics.com, hereinafter referred to as the Company.

The Company maintains and manages its website at <http://kindii.pl>.

II. Data Protection Officer

The Data Protection Officer appointed by the Company is Ms. Anna Żmijewska, who can be contacted by e-mail at iod@harperhygienics.com;

III. The purposes and the basis of personal data processing

THE DATA OF WEBSITE USERS

In order to **contact you** in relation to the case you have described, we process personal data such as:

- first name and surname,
- e-mail address or phone no.,
- the subject matter of the case due to which you have contacted us,
- position or function,
- the place where you are employed or data of the entity you represent.

The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows us to exercise our legitimate interest, which in this case is responding to your message sent to us using the contact data provided on the website.

For archiving and evidentiary purposes, we process the following personal data:

- first name and surname,
- e-mail address or phone no.,
- the subject matter of the case due to which you have contacted us,
- position or function,
- the place where you are employed or data of the entity you represent.

– for the purpose of safeguarding information that may be used to establish facts of legal significance. The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows for processing of the personal data if the Controller of Personal Data thus pursues a legitimate

interest (in this case, the interest of the Company lies in the possession of personal data that will enable to prove certain facts related to your contact with the Company);

We process the following personal data for the purpose of **establishing, investigating or defending claims**:

- first name and surname,
- e-mail address or phone no.,
- position or function,
- the place where you are employed or data of the entity you represent.
- the subject matter of the case due to which you have contacted us.

– for the purpose of safeguarding information that may be used to establish facts of legal significance. The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows for processing of the personal data if the Controller of Personal Data thus pursues a legitimate interest (in this case, the interest of the Company lies in the protection of its proprietary interest);

For the purpose of **meeting the obligations resulting from the GDPR**, we may process the following personal data:

- first name and surname,
- e-mail address or phone no.,
- other data necessary to comply with the obligations under the GDPR.

The legal basis for such processing is Article 6(1)(c) of the GDPR in conjunction with the GDPR and Article 6(1)(f) of the GDPR, which allows for processing of the personal data if the Controller of Personal Data thus pursues a legitimate interest (in this case, the interest of the Company lies, for example, in keeping records and registers, as well as in the possession of information concerning persons who have exercised the rights provided for in the GDPR);

For **analytical** purposes, i.e. research and analysis of the activity on the website belonging to the Company, we process such personal data as:

- date and time of your visit,
- the type of operating system,
- approximate location,
- the type of web browser used to browse the site,
- time spent on the site,
- the subpages visited.

The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows for processing of the personal data if the Controller of Personal Data thus pursues a legitimate interest (in this case, the interest of the Company lies in getting acquainted with the users' activities on the website).

For the purpose of **advertising, market research and the research of users' behaviour and preferences**, using the results of this research to improve the quality of the services provided by the Company, we process such personal data as:

- date and time of your visit,
- the type of operating system,
- approximate location,
- the type of web browser used to browse the site,

- time spent on the site,
- the subpages visited;
- other data obtained through the use of cookies,
- other data collected by external providers of analytical, promotional and advertising tools (such as Google Analytics).

The legal basis for such data processing is Article 6(1)(a) of the GDPR, which allows processing of personal data on the basis of a voluntary consent (upon your first visit on the website, you are asked for your consent to the use of the tools).

In order to **use cookies** on the website, we process text information (cookies will be described in a separate section). The legal basis for such processing is Article 6(1)(a) of the GDPR, which allows processing of personal data on the basis of a voluntary consent (upon your first visit on the website, you are asked for your consent to the use of cookies);

IV. Cookies

1. The Company, similarly to other entities, uses so-called cookies on its website, i.e. short text information saved on a computer, phone, tablet or another user's device. They can be read by our system, as well as by systems belonging to other entities whose services we use (e.g. Google).
2. Cookies perform many functions on the website, most often useful, which we will try to describe below (if the information is insufficient, please contact us):
 - **ensuring security** – cookies are used to protect your personal data against unauthorized access;
 - **impact on the processes and efficiency of website use** – cookies are used to make the website work smoothly and to make use of the functions that it offers, which is possible, among other things, by recording settings between subsequent visits to the website. Therefore they allow you to navigate the website and the individual subpages in an efficient manner;
 - **session status** – cookies often store information about how visitors use the website, e.g. which subpages they display most often. They also allow you to identify errors displayed on some subpages. Cookies used to store so-called „session status” thus help to improve the service and increase the comfort of browsing;
 - **creating statistics** – cookies are used to analyse how users use the website (how many open the website, how long they stay on it, which content arouses most interest, etc.). This enables constant improvement of the website and adaptation of its operation to users' preferences. We use Google tools such as Google Analytics to track activity and create statistics; in addition to reporting website usage statistics, Google Analytics Pixel can also be used, together with some of the cookies described above, to help you display more relevant content using Google services (e.g. in the Google search engine) and across the network;
3. Your web browser allows the use of cookies in your device by default, so please give your consent to the use of cookies on your first visit. However, if you do not wish to use cookies when browsing the website, you can change the settings in your browser: completely block the automatic handling of cookies or request notification each time you place cookies on your device. The settings can be changed at any time.

4. While respecting the autonomy of all persons using the website, we feel obliged to warn you that disabling or restricting the use of cookies may cause quite serious difficulties in using the website, e.g. in the form of having to log on to each subpage, longer loading period of the website, limitations in using the functionality.

V. Tracking website user activity

1. For the purposes of advertising and promotion, as well as with the view to improving the quality of provided services, the Company uses IT tools that are provided by external suppliers.
2. At present, the Company uses the following tools:
 - Google Analytics - to collect data about the users visiting the Company website;
3. The use of the above tools is subject to your consent, given when you first visit the Company's website.
4. You may withdraw your consent concerning the tool at any time by changing the settings (https://kindi.pl/delete_cookies).

VI. Right to withdraw consent

1. If the processing of your personal data is based on your consent, you may withdraw your consent at any time, at your own discretion, by changing the settings - (https://kindi.pl/delete_cookies).
2. If the processing of your personal data was based on your consent, its revocation does not make the processing of your personal data illegal until that moment. In other words, until your consent is revoked, we have the right to process your personal data, and revoking your consent does not affect the lawfulness of processing up to that date.

VII. Requirement to provide personal data

1. The provision of personal data is voluntary and depends on your decision. However, it is necessary to provide certain personal data to meet your expectations regarding the use of the website or for contacting the Company.
2. If you contact us on behalf of our customer or counterparty, it may be necessary for you to provide data related to your relationship with the customer or the counterparty of the Company; such provision may also be necessary for us with a view to concluding or performing a contract with or for the person on whose behalf you communicate with us.

VIII. Automated decision making and profiling

We kindly inform that we do not make automated decisions, including those based on profiling.

IX. Personal data recipients

1. Like most entrepreneurs, in our business activity we use the assistance of other entities, which often involves the need to transfer personal data. Therefore, if necessary, we may pass on your data to the lawyers, the provider of the statistics tool, if you communicate with the Company on behalf of our customer or counterparty - to entities involved in the case in relation to which you communicate with us.
2. In addition, we may for example have to pass on your personal data to other entities, whether public or private, on the basis of the applicable law or a decision of a competent authority. Therefore, it is extremely difficult for us to predict who can request personal data. However, for our part, we assure you that we analyse all requests for personal data very carefully and thoroughly so as not to inadvertently pass on the information to an unauthorised person.

X. Transfer of personal data to third countries

We kindly inform you that we may transfer your data outside the European Economic Area, which is related, among other things, to our cooperation with various entities, e.g. when we use an application provided by one of the American entities. For our part, we assure you that your data will be transferred in compliance with all legal requirements, including on the basis of an appropriate agreement containing data protection clauses adopted by the European Commission, ensuring an adequate safeguarding of the personal data transferred.

XI. Period of processing of personal data

1. We do not process your personal data „indefinitely”, but for the time necessary to achieve the stated purpose, in accordance with the applicable laws. After this period your personal data will be deleted or destroyed.
2. With regards to the individual personal data processing periods, we kindly inform you that we process your personal data for a period of time:
 - until the consent is withdrawn or until the purpose of the processing is achieved – in the case of personal data processed based on consent;
 - until the effective objection is raised or the purpose of the processing is achieved (including e.g. expiry of the limitation periods) – with regards to personal data processed on the basis of the Company’s legitimate interest;
 - until they become obsolete or no longer usable, however for no more than 2 years, with regards to personal data processed primarily for analytical purposes, the use of cookies and the administration of the website,
 - until the expiry of the limitation periods, with regards to data processed under tax law.

XII. Rights of data subjects

1. We kindly inform you that you have the right to:
 - access your personal data;

- rectify your personal data;
 - delete your personal data;
 - limit the processing of your personal data;
 - object to the processing of your personal data;
 - transfer your personal data.
2. We respect your rights under data protection laws and we try to facilitate their implementation as much as possible.
 3. We would like to point out that the above-mentioned rights are not absolute and therefore in some situations we may legally refuse to fulfil them. However, if we refuse to grant a request, it is only after careful analysis and only if it is necessary to refuse to grant the request.
 4. With regards to the right to object, we would like to explain that you have the right to object to the processing of your personal data at any time conducted on the basis of the legitimate interest of the Personal Data Controller in relation to your particular situation. Please note, however, that under the law we may refuse to accept an objection if we prove that:
 - there are legitimate grounds for processing which take precedence over your interests, rights and freedoms, or
 - there are grounds for establishing, pursuing or defending claims.

XIII. Right to file a complaint

If you believe that your personal data is being processed in violation of the law, you may file a complaint with the President of the Personal Data Protection Office.

XIV. Final provisions

1. To the extent not covered by this Privacy Policy, the regulations on personal data protection shall apply.
2. You will be notified of any amendments to this Privacy Policy by e-mail.