

• **PRIVACY POLICY FOR THE WEBSITE PUBLUU.COM**

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- **1. GENERAL PROVISIONS**
 1. Personal data collected by the Data Controller via the website are processed in accordance with the 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/WE (General Data Protection Regulation), hereinafter referred to as the
 2. Capitalised terms used in this Privacy Policy shall have the meaning set forth in the “Definitions” section of the com Terms and Conditions.
- **2. TYPE OF PERSONAL DATA PROCESSED, PURPOSE AND SCOPE OF DATA COLLECTION**
 1. **PURPOSE AND LEGAL BASIS OF PROCESSING.** The Data Controller shall process a com User’s personal data in the following circumstances:
 1. Account registration with com, for the purpose of creation and management of an individual User Account, as set forth in Article 6 (1) (b) of the GDPR (performance of the electronic services agreement in accordance with the Terms and Conditions for publuu.com).
 2. Order placement with publuu.com, for the purpose of performance of the sales agreement as prescribed under Article 6 (1) (b) of the GDPR (performance of the sales agreement),
 2. **TYPE OF THE PERSONAL DATA PROCESSED.**
 1. Name and surname,
 2. Business name,
 3. Address,

4. Tax identification number NIP,
5. Email address.

1. **PERSONAL DATA STORAGE PERIOD.** Personal data submitted by Users are retained by the Data Controller for the following retention periods:

1. if the lawful basis is agreement performance: personal data are stored for as long as necessary for the performance of an agreement, and thereafter until the expiry of any statutory period of prescription or limitation. Unless a specific regulation provides otherwise the limitation period is six years, whereas for claims concerning periodical performances and claims connected with conducting business activity – three years.
 2. if the lawful basis is consent: personal data are stored until withdrawal of consent, and thereafter until the expiry of any statutory period of prescription or limitation for claims that may be raised by the Data Controller or that may be brought against the Data Controller. Unless a specific regulation provides otherwise the limitation period is six years, whereas for claims concerning periodical performances and claims connected with conducting business activity – three years.
2. The Data Controller may collect additional User information, including, in particular: a User's computer IP address, the IP address of the internet provider, domain name, browser type, duration of a visit, operating system.
 3. The Data Controller may collect navigational data, including links and references followed by the User or information about the User's activity on the Website. The legal basis for such processing is the legitimate interest of the Data Controller (Article 6 (1) (f) of the GDPR), insofar as this data is used to provide an easier access to the electronic services rendered

via the Website and to facilitate the functionality of these services.

4. Submitting personal data to publuu.com is voluntary.
5. The personal data collected via the Website is subject to automatic processing through profiling if the data subject has consented to such processing (Article 6 (1) (a) of the GDPR). As a result of profiling a profile is built of each data subject which enables the Data Controller to take decisions concerning Users as well as to analyse or predict their personal preferences, behaviours and attitudes.
6. The Data Controller shall take all reasonable steps to protect the interests of data subjects and ensure that all data is:
 1. lawfully processed,
 2. obtained only for specified, lawful purposes, and not further processed in any manner incompatible with those purposes,
 3. factually correct, adequate and relevant in relation to the purposes for which it is processed; stored in a form that permits identification of the data subject, for no longer than is necessary for those purposes.

• **3. THIRD PARTY ACCESS TO PERSONAL INFORMATION**

1. Users' personal information is shared with third party services providers to enable the Service Provider to run his business via publuu.com. Depending on contractual arrangements and circumstances, those third-party services providers either process personal data on the Data Controller's instructions (processors) or themselves determine the purposes for which and the manner in which personal data is processed (controllers).
2. The Users' personal data is stored only within the European Economic Area (EEA).

• **4. RIGHT OF CONTROL, ACCESS AND RECTIFICATION**

1. Every User has a right to access and/or rectify his personal data as well as the right to erasure, the right to restrict

processing, the right to data portability, the right to object to processing and the right to withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

2. Legal basis for data subjects' rights:
 1. **Access to personal data** – Article 15 of the GDPR
 2. **Rectification of personal data** – Article 16 of the GDPR,
 3. **Erasement of personal data (right to be forgotten)** – Article 17 of the GDPR,
 4. **Restriction of data processing** – Article 18 of the GDPR,
 5. **Data portability** – Article 20 of the GDPR,
 6. **Objection to processing** – Article 21 of the GDPR,
 7. **Withdrawal of consent to processing** – Article 7 (3) of the GDPR.
 3. The User may exercise his rights under point 2 by sending an email message to: info@publuu.com.
 4. If any request is received in relation to a data subject's rights, the Data Controller must comply with or refuse to act on a User's request without delay but not later than within a month of receiving the request. However, if a request is complex or if the Data Controller receives more requests, the Data Controller may extend the time to respond by a further two months. If this is the case the Data Controller shall inform the User within one month of receiving their request and explain why the extension is necessary.
 5. If the data subject considers that, in connection with personal data relating to him or her, there is an infringement of the GDPR, the data subject may make a complaint to the President of the Personal Data Protection Office.
- **5. COOKIE POLICY**
 1. com uses cookies.
 2. Cookies are essential for the provision of electronic services via the Shop. Cookies, contain information that is necessary

for the proper functioning of the Shop and for the statistical analysis of website traffic.

3. The website uses two types of cookies: “session” cookies and “persistent” cookies.
 1. “Session” cookies are temporary files which are stored on the User’s end-device until they log out (leave the website).
 2. “Persistent” cookies remain stored on the User’s device until deleted manually or automatically after a set period of time.
4. The Data Controller uses their own cookies to provide information on how individual Users interact with the Website. These files collect information about how Users use the website, what type of website referred the User to publuu.com, the frequency of visits and the time of each visit. This information does not register the Users’ personal data and is used solely for statistical analysis of website traffic.
5. The User can adjust cookie permissions via options in their browser settings. More detailed information about cookie management with specific web browsers can be found in the browsers’ respective settings.

• **6. FINAL PROVISIONS**

1. The Data Controller shall implement all necessary technical and organisational security measures to safeguard the data during processing ensuring a level of security appropriate to the nature of the data to be protected and, in particular, protect the data against unauthorised access, takeover, processing in violation of law, alteration, loss, damage or destruction.
2. The Service Provider shall take appropriate technical measures to safeguard the electronic personal data against unauthorised interception or modification.
3. In cases not provided for in this Privacy Policy the relevant provisions of the GDPR shall apply as well as applicable provisions of EU law.