

## PRIVACY POLICY

This document sets out the rules for collecting and using data on the website [www.souvre.com](http://www.souvre.com) (hereinafter referred to as the "Website"), which is owned by SOUVRE Sp. z o.o., Sp.k. (hereinafter the "Controller" and/or "SOUVRE")

### GENERAL INFORMATION

1. As SOUVRE Sp. z o.o., Sp.k., we take privacy protection seriously, and therefore, we present our Privacy Policy below, so that Users visiting our Website have current knowledge about the information we collect about them and how we use it.
2. Our Website operates in compliance with the requirements of universally and absolutely binding legal provisions and with the application of generally accepted principles of website functioning, including in particular the security of website users and technical and organisational measures used for this purpose.
3. This Privacy Policy applies only to our Website. The Website may contain links to other websites. Please note that after switching to other websites, you should read the privacy policy in force there.
4. The Controller of your personal data is SOUVRE Sp. z o.o. Sp.k. KRS [National Court Register No]: Number 0000584353 National Business Registry Number REGON: 362751616, Tax Identification Number NIP: 5562761020 with its registered office in Inowrocław, at Aleja Okrężna 8, 88-100 Inowrocław, contact: [bok@souvre.pl](mailto:bok@souvre.pl), and the right to process the above data, on the basis of a concluded personal data processing outsourcing agreement, is held by SOUVRE EUROPE Sp. z o.o. with its registered office in Inowrocław, at Aleja Okrężna 8, KRS [National Court Register No]: 0000774374, NIP [Tax ID No]: 5562780276, REGON [National Business Registry No]: 382694245, (hereinafter "SOUVRE EUROPE")
5. Data Protection Officer – address: [iod@souvre.pl](mailto:iod@souvre.pl)

### PERSONAL DATA PROTECTION

1. SOUVRE processes personal data of Website Users:
  - a. Pursuant to Art. 6(1)(b) GDPR - in order to conclude an agreement, based on the request of a User;
  - b. Pursuant to Art. 6(1)(b) GDPR - in order to perform an agreement, if it had been concluded;
  - c. Pursuant to Art. 6(1)(a) GDPR, on the basis of a consent of a User for the purpose of marketing and promotion of SOUVRE products and services. At any time, the User has the right to withdraw consent to the processing of personal data, while such a withdrawal of consent does not affect the lawfulness of the processing which was made under the consent before its withdrawal;
  - d. Pursuant to Art. 6(1)(c) GDPR - to fulfil the legal obligation of the Controller, i.e. to issue and store invoices and accounting documents;
  - e. Pursuant to Art. 6(1)(f) GDPR - to adjust, pursue or defend itself against potential claims in order to exercise our legitimate interest;
  - f. Pursuant to Art. 6(1)(f) GDPR - for analytical purposes (better selection of services for our customers, general optimisation of our products, optimisation of customer service processes, building knowledge about our customers, financial analysis of our company in order to exercise our legitimate interest;
  - g. Pursuant to Art. 6(1)(f) GDPR - for archival purposes that are the implementation of our legitimate interest in securing information in the event of a legal need to prove facts;
  - h. Pursuant to Art. 6(1)(f) GDPR - to study customer satisfaction to exercise our legitimate interest of determining the quality of our service and the level of satisfaction of our customers with our products and services;
  - i. Pursuant to Art. 6(1)(f) GDPR - to offer Users products and services directly, including selecting them in terms of the needs of the Users, namely profiling, in order to exercise our legitimate interest;
  - j. Pursuant to Art. 6(1)(f) GDPR - to offer Users directly the products and services of companies cooperating with us, e.g. in the form of discount coupons, including matching them with the needs of the User, namely profiling, in order to exercise our legitimate interest.
2. In connection with the processing of data for the purpose indicated in paragraph 1, personal data of Users may be shared with other recipients of personal data or with categories of recipients with whom SOUVRE has concluded an outsourcing agreement. The recipients of User's personal data may be:
  - a. Entities from our corporate group;

- b. Entities with whom we cooperate, which support us e.g. by providing accounting, logistic, IT, marketing, legal, insurance, graphic, promotional, or correspondence handling services, or which support our Customer Service process;
  - c. other Partners authorized to build a Structure, provided that the User has given his consent
  - d. Entities providing postal or courier services and payment service providers;
  - e. Entities purchasing receivables if a User fails to pay our invoices.
3. Users' personal data will be processed for the period necessary to implement the processing purposes indicated in point 1:
  - a. Personal data resulting from the conclusion of an agreement will be processed for the duration of the agreement and for the period in which claims related to this agreement may be submitted, in accordance with the limitation periods specified in the Civil Code;
  - b. If the agreement is not concluded within 30 days of the submission of the application for registration by the candidate for the SOUVRE Club member, personal data related to discussions about this agreement will be immediately removed, except for the data needed for the purpose of direct marketing, obtained with the express consent of the User;
  - c. The data processed for the purpose of direct marketing of our products and services can be processed until the User objects to their processing for this purpose or we find that they have become obsolete;
  - d. The data necessary to fulfil the legal obligation of the Controller - for the period for which we are required by the law to store data, e.g. tax data.
4. In connection with the processing of personal data by SOUVRE, the User has the right to:
  - a. Access the data pursuant to Art. 15 GDPR;
  - b. Correct the data pursuant to Art. 16 GDPR;
  - c. Remove the data pursuant to Art. 17 GDPR;
  - d. Limit the processing of data pursuant to Art. 18 GDPR;
  - e. Object to the processing of data pursuant to Art. 21 GDPR;
  - f. Transfer the data pursuant to Art. 20 GDPR.
5. In the event that the processing of personal data by SOUVRE violates the provisions of the GDPR, the User has the right to lodge a complaint with the supervisory body, i.e. the President of the Office for Personal Data Protection with its registered office in Warsaw (00-193), ul. Stawki 2. The User has the right to lodge a complaint with the competent supervisory authority in the country, in where he usually resides or works, or in the country where the alleged violation took place.
6. In the process of selling products and managing a partner network, we make decisions in an automated manner, including profiling, based on data received during registration to the SOUVRE Club and/or placing orders, using ICT systems. Profiling means the processing of personal data consisting in using Users' personal data to analyse their preferences or future behaviours.
7. Automated decision-making is necessary for the purpose of concluding the agreement and for its implementation and is based on the User's consent.
8. The provision of data is voluntary. Failure to provide personal data will result in the inability to conclude an agreement with the User.
9. Regardless of the rights listed in point 4, Users may at any time object to the processing of their data (including profiling) for direct marketing purposes. Having received a request regarding this matter, we are obliged to stop processing the data for this purpose. In special situations, the User may at any time object to the processing of personal data (including profiling) if the basis for the use of the data constitutes our legitimate interest or public interest. In such a case, after considering the request, we will no longer be able to process the personal data whom the objection concerns on this basis, unless we prove that there is:
  - a. Important legal basis for data processing, which under applicable law is considered superior to the interests of Users, their rights and freedoms;
  - b. Basis for adjustment, pursuit or defence of claims.

In each case, SOUVRE as the Controller is responsible for data use in a safe manner, in accordance with the agreement and applicable laws.

10. The Website [www.souvre.com](http://www.souvre.com) uses the SSL protocol for the domain plus a hardware firewall with built-in antivirus software, which ensures confidentiality, security of data transfer and integrity of data transmission.
11. SOUVRE EUROPE collects the data of Website Users in the following way:
  - a. By entering these data by candidates for members of the SOUVRE Club in the fields of the Registration Form of the SOUVRE Club provided on the Website;
  - b. By Users' entering the data in order form fields available on the Website;
  - c. By saving cookie files ("cookies") on the User's device;
  - d. By collecting web server logs.

## INFORMATION ON COOKIES

1. Cookie files (aka "cookies") are IT data, in particular text files, which are stored in the User's end device and are intended for using the Website's pages. Typically, cookies include the name of the website they originate from, the time they are stored on the User's end device and a unique number that allows us to perform statistical calculations concerning our Website's popularity, most often visited categories or the end User's interests. It also indicates the necessary corrections to rarely visited sub-sites. As a Web host, we also record and read information in the localStorage data warehouse. Moreover, cookies and localStorage information transfer allow the Website/Mobile Application to maintain User's session after logging in to the website, thus eliminating the need for re-logging on each sub-site of the Website.
2. Because of the method of storage, there are two types of cookie files:
  - a. Session cookies - the files maintaining User's session continuity. These are temporary files recorded in the browser until the User logs out.
  - b. Persistent cookies - stored for a specified duration in User's browser parameters or until they are manually removed.
3. Cookies and information recorded in the localStorage do not have a negative impact on the operating system of the User. They do not modify system or data files and do not target the functionality and performance of the system. Identification is performed anonymously and without using names. The information we receive is intended to let us know how the Website is used.
4. The software used for browsing websites (web browser) in many cases allows the storage of cookies on the end device of the User by default. Users of the Website [www.souvre.com](http://www.souvre.com) may change cookie settings at any time.
5. Because of their function, we use the following cookie files on our Website:
  - a. The necessary cookies allowing access services to the Website;
  - b. Security cookies to detect abuse;
  - c. Performance cookies - to collect information on how the Website is used;
  - d. Functional cookies - to record User's settings;
6. The data collected will be used for profiling and personalising content.
7. In the event that you refuse to provide us with consent to use cookies and localStorage for the aforementioned purposes, we will have to record a cookie file keeping such information on your device. If your browser settings do not allow it, we will have to ask you to provide consent each time to record such information.
8. If you don't want to use automatic recording, you have to reconfigure your Internet browser and use the option of automatic refusal. The settings allow managing other options, such as cookies. Below you can find links to the official pages of the most commonly used Internet browsers, including description of cookies and instruction on managing cookies.

Internet Explorer:

<https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies>

Mozilla Firefox:

<http://support.mozilla.org/pl/kb/ciasteczka>

Google Chrome:

<http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>

Opera:

<http://help.opera.com/Windows/12.10/pl/cookies.html>

Safari:

<https://support.apple.com/kb/PH5042?locale=en-GB>

9. Server log data are used only to administer the Website and to provide the most efficient service of hosting services provided to SOUVRE.
10. You should be advised that to provide our services, analyse and improve them, we also use services and tools of other entities.
11. Below please find information on tools and services we use, which you should be aware of:
  - a. Google Analytics

On our Website and mobile applications, we use the Google Analytics tool supplied by Google Inc., headquartered in the US. It is a Web analysis tool used by Google and which refers to our Website using cookies. Information generated by cookies about your use of the Website, which description can be found here: <https://policies.google.com/privacy?hl=pl> is transferred to and recorded on a Google server to be analysed. For security reasons, IP anonymisation has been activated in this process. At our request, Google will use the acquired data to verify your use of our services and to report it.
  - b. Google Ads

We measure the advertising of our Services through the Google Ads platform. We use tracking processes for conversion and remarketing, and thus we learn what happened after the integration of the Website User with the advertisement. This allows us to optimise our promotional activities carried out within the Google Ads platform using the tools:

    - We are able to determine which keywords, campaigns or ad groups are most effective in attracting user operations;
    - We know our return on investment in advertising, which allows us to optimise costs for marketing and advertising;
    - We automatically adjust our advertising approach to our business goals;
    - We can display Google Ads to the users who have visited our Websites.
  - c. Facebook Pixel

We use Facebook Pixel's mechanism on our Website. We use it to measure the effectiveness of advertising our Website using the Facebook platform. The mechanism allows us to measure the effectiveness of ads based on an analysis of actions taken by users using our Website. We use pixel data for the following purposes:

    - To target ads to the right audience;
    - To analyse actions when an advertisement is clicked on;
    - To use other Facebook advertising tools.

We reserve the right to change the above Privacy Policy by publishing a new version on this page.

**We hope you'll have fun using our Website.**