

PRIVACY POLICY

1. DEFINITIONS

- 1.1. **Controller** – **MIKOMAX Spółka z ograniczoną odpowiedzialnością spółka komandytowa (*limited partnership*)** with its registered office in Łódź (ul. Dostawcza 4, 93-231 Łódź) registered in the Business Register of the National Court Register kept by the District Court for Łódź-Śródmieście in Łódź, XX Commercial Division of the National Court Register under KRS number 0000338816, Statistical Number (REGON): 100761902, Taxpayer Identification Number (NIP): 7282735086.
- 1.2. **Personal Data** – means any information relating to an identified or identifiable natural person by reference to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, including the IP address of a device, location data, an online identifier or information collected through cookies and other similar technologies.
- 1.3. **Policy** – this Privacy Policy.
- 1.4. **GDPR** – 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/EC.
- 1.5. **Website** – an online service maintained by the Controller at the following address www.justbooth.com.
- 1.6. **User** – any natural person visiting the Website or using one or more of the services or functionalities described in the Policy.

2. DATA PROCESSING IN CONNECTION WITH THE USE OF THE WEBSITE

- 2.1. In connection with the use of the Website by the User, the Controller collects data to the extent necessary to provide specific services offered, as well as information about the User's activity on the Website. Please find below detailed terms and purposes of processing Personal Data collected during the use of the Website by the User.

3. PURPOSES AND LEGAL BASIS OF PERSONAL DATA PROCESSING ON THE WEBSITE

USING THE WEBSITE

- 3.1. Personal Data of all persons using the Website (including their IP address or other identifiers and information collected through cookies or other similar technologies) are processed by the Controller:
 - 3.1.1. in order to provide services by electronic means with respect to making the content collected on the Website available to the Users - then the legal basis for the processing is the necessity of the processing for the performance of a contract (Article 6(1)(b) of the GDPR;

- 3.1.2. for analytical and statistical purposes - then the legal basis for the processing is the Controller's legitimate interest (Article 6(1)(f) of the GDPR), consisting in conducting analyses of Users' activity, as well as their preferences, including by means of direct surveys or conversations with Users, in order to improve the functionalities and services provided;
 - 3.1.3. in order to determine (if necessary) and assert claims or defend against claims - then the legal basis for the processing is the Controller's legitimate interest (Article 6(1)(f) of the GDPR), consisting in protecting its rights.
- 3.2. The User's activity on the Website, including their Personal Data, is recorded in system logs (a dedicated computer program designated for storing a chronological record containing information on events and activities that concern the IT system used by the Controller to provide services). The information collected in the logs is processed primarily for the purposes related to the provision of services. The Controller shall also process such information for technical and administrative purposes, for the purposes of ensuring security of the IT system and system management, as well as for analytical and statistical purposes - in this respect, the legal basis for the processing is the Controller's legitimate interest (Article 6(1)(f) of the GDPR).

PLACING PURCHASE ORDERS

- 3.3. Placing a purchase order (purchasing goods or services) by the User is associated with the processing of their Personal Data. Providing data marked as obligatory is required for the purpose to accept and handle the purchase order, and a failure to provide such data results in the inability to handle it. Providing other data is optional.
- 3.4. Personal Data are processed:
- 3.4.1. for the purpose of carrying out the purchase order placed - the legal basis for the processing is the necessity of the processing in order to perform a contract (Article 6(1)(b) of the GDPR); with respect to personal data provided optionally, the legal basis for the processing is consent (Article 6(1)(a) of the GDPR);
 - 3.4.2. in order to fulfil the statutory obligations imposed on the Controller, arising in particular from tax and accounting regulations - the legal basis for the processing is the legal obligation (Article 6(1)(c) of the GDPR);
 - 3.4.3. for analytical and statistical purposes - the legal basis for the processing is the Controller's legitimate interest (Article 6(1)(f) of the GDPR), consisting in conducting analysis of Users' activity on the Website, as well as their purchase preferences, including by means of direct surveys or conversations with the Users, in order to improve the functionalities provided therein;
 - 3.4.4. in order to determine (if necessary) and assert claims or defend against claims - the legal basis for the processing is the Controller's legitimate interest (Article 6(1)(f) of the GDPR), consisting in protecting its rights.

CONTACT FORMS

- 3.5.** The Controller enables contact by means of electronic contact forms. The use of the form requires providing Personal Data necessary to establish contact with the User and to respond to the enquiry. The User may also provide other data in order to facilitate contact or handle the enquiry. Providing data marked as obligatory is required in order to accept and handle the enquiry, and a failure to provide such data results in the inability to handle it. Providing other data is optional.
- 3.6.** Personal Data in the form "Contact", "Download leaflet" and "Ask for product" are processed:
- 3.6.1.** for the purpose of identifying the sender and handling their enquiry or request sent via the form provided - the legal basis for the processing is the necessity of the processing for the performance of a service contract (Article 6(1)(b) of the GDPR);
 - 3.6.2.** in case marketing content is addressed to the User as part of the response to the enquiry - the legal basis for the processing is the Controller's legitimate interest (Article 6(1)(f) of the GDPR) in connection with the request or enquiry;
 - 3.6.3.** for analytical and statistical purposes - the legal basis for the processing is the Controller's legitimate interest (Article 6(1)(f) of the GDPR), consisting in keeping statistics of enquiries submitted by the Users via the Website, including by means of direct surveys or conversations with the Users, in order to improve its functionalities;
 - 3.6.4.** in order to determine (if necessary) and assert claims or defend against claims, the legal basis for the processing is the Controller's legitimate interest (Article 6(1)(f) of the GDPR), consisting in protecting its rights.
- 3.7.** Personal Data in the form "Become Distributor" are processed:
- 3.7.1.** for the purpose of identifying the sender and initiating commercial cooperation - the legal basis for the processing is the necessity of the processing to take actions at the request of the data subject prior to the conclusion of a contract (Article 6(1)(b) of the GDPR);
 - 3.7.2.** for analytical and statistical purposes - the legal basis for processing is the Controller's legitimate interest (Article 6(1)(f) of the GDPR), consisting in keeping statistics of enquiries submitted by Users via the Website, including by means of direct surveys or conversations with the Users, in order to improve its functionalities;
 - 3.7.3.** in order to determine (if necessary) and assert claims or defend against claims - the legal basis for the processing is the Controller's legitimate interest (Article 6(1)(f) of the GDPR), consisting in defending the Controller's economic interests.

RECEIVING COMMERCIAL INFORMATION

- 3.8. The Controller sends commercial information to persons who have consented thereto, in particular those who have provided their e-mail address for that purpose.
- 3.9. Personal Data are processed:
- 3.9.1. in order to direct marketing content to the User - the legal basis for the processing, including the use of profiling, is the Controller's legitimate interest (Article 6(1)(f) of the GDPR) in connection with the granted consent to receive commercial information;
 - 3.9.2. for analytical and statistical purposes - then the legal basis for the processing is the Controller's legitimate interest (Article 6(1)(f) of the GDPR), consisting in conducting analyses of Users' activity on the Website, including by means of direct surveys or conversations with the Users, in order to improve the functionalities provided therein;
 - 3.9.3. in order to determine (if necessary) and assert claims or defend against claims, the legal basis for the processing is the Controller's legitimate interest (Article 6(1)(f) of the GDPR), consisting in protecting its rights.

4. COOKIES AND SIMILAR TECHNOLOGIES

- 4.1. Cookies are small text files installed on the User's device when browsing the Website. Cookies collect information facilitating the use of the website, e.g., by remembering the User's visits to the Website and actions performed thereby.

"SERVICE" COOKIES

- 4.2. The Controller uses the so-called service cookies primarily to provide the User with services provided by electronic means and to improve the quality of those services. Therefore, the Controller and other entities providing analytical and statistical services for the benefit of the Controller use cookies, storing information or gaining access to information already stored in the User's telecommunication end device (computer, telephone, tablet etc.) Cookies used for this purpose include:
- 4.2.1. user input cookies (session identifier) entered by the User for the duration of the session;
 - 4.2.2. authentication cookies used for services requiring authentication for the duration of the session;
 - 4.2.3. user centric security cookies, e.g., used to detect abuses concerning authentication;;
 - 4.2.4. multimedia player session cookies (e.g., flash player cookies), for the duration of the session;
 - 4.2.5. persistent user interface customization cookies, for the duration of the session or slightly longer.

ANALYTICAL AND MARKETING COOKIES

- 4.3. The Controller and its trusted partners also use cookies for analytical purposes, e.g., to create website visit statistics and for marketing purposes, inter alia, in connection with directing behavioural advertising to Users. For this purpose, the Controller and its trusted partners store information or gain access to information already stored in the User's telecommunications end device (computer, telephone, tablet, etc.)

5. ANALYTICAL AND MARKETING TOOLS APPLIED BY CONTROLLER'S PARTNERS

- 5.1. The Controller and its Partners apply various solutions and tools used for analytical and marketing purposes. Please find below basic information on these tools. Detailed information in this respect may be found in the privacy policy of a given partner.

GOOGLE ANALYTICS

- 5.2. Google Analytics cookies are files used by the company Google to analyse the way the User uses the Website, to create statistics and reports on the functioning of the Website. Google does not use the collected data to identify the User, nor does it combine this information to enable identification. Detailed information on the scope and principles of data collection in connection with this service may be found under the link: <https://www.google.com/intl/pl/policies/privacy/partners>.

ALBACROSS

- 5.3. Albacross is a tool to verify the effectiveness of marketing activities generating traffic to the website. To this end, Albacross pixels collect information about the IP address of the device from which the User visited the website, as well as technical information enabling Albacross to distinguish various visitors from the same IP address. Detailed information on the scope and principles of data collection in connection with this service may be found under the link: <https://albacross.com/privacy-policy/>.

6. MANAGEMENT OF COOKIE SETTINGS

- 6.1. The User's consent is required to use cookies for the purpose of collecting data through them, including accessing the data stored on the User's device. On the Website, the Controller obtains the User's consent through a cookie banner. Such consent can be withdrawn at any time pursuant to the rules specified in clauses 6.4 and 6.5 below.
- 6.2. The consent is not required exclusively for cookies that are necessary for the provision of a telecommunication service (transmission of data for the purposes of displaying content).
- 6.3. In order to receive advertising content tailored to the User's preferences, in addition to consenting to the installation of cookies through the banner, it is necessary to maintain appropriate browser settings, allowing for the storage of cookies from the Website on the User's end device.

- 6.4. The consent to collecting cookies can be withdrawn on the Website through the cookie banner. The User can return to the banner by clicking the button labelled as 'Manage cookie settings' available on each page of the Website.
- 6.5. On the displayed banner, the User can withdraw their consent by clicking the 'Manage cookies' button. Then, the User toggles the slider for the respective cookie category and clicks the 'Close and save' button.
- 6.6. The withdrawal of consent to the use of cookies is possible via browser's settings.. Detailed information on this matter may be found under the following links:
 - 6.6.1. Internet Explorer: <https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies>
 - 6.6.2. Mozilla Firefox: <http://support.mozilla.org/pl/kb/ciasteczka>
 - 6.6.3. Google Chrome: <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>
 - 6.6.4. Opera: <http://help.opera.com/Windows/12.10/pl/cookies.html>
 - 6.6.5. Safari: <https://support.apple.com/kb/PH5042?locale=en-GB>
- 6.7. The User may at any time verify the status of their current privacy settings for the browser being used, with the tools available under the following links:
 - 6.7.1. <http://www.youronlinechoices.com/pl/twojewybory>
 - 6.7.2. <http://optout.aboutads.info/?c=2&lang=EN>

7. PERIOD OF PROCESSING OF PERSONAL DATA

- 7.1. The period for which the data are processed by the Controller depends on the type of service provided and the purpose of processing. As a rule, data shall be processed for the duration of the provision of the service or the completion of the order, until the withdrawal of the consent or effective opposition to data processing in cases where the legal basis for data processing is the Controller's legitimate interest.
- 7.2. The period of data processing may be extended where processing is necessary to determine and assert potential claims or defence against claims, and thereafter only if and to the extent required by law. After the lapse of the processing period, data are irretrievably erased or rendered anonymous.

8. USER RIGHTS

- 8.1. Each User has the following rights:
 - 8.1.1. **the right to information about the processing of personal data** - on this basis the Controller shall provide the natural person submitting a request with information about the processing of data, including first and foremost the purposes and legal basis of the processing, the scope of data held in possession, the entities to whom they are disclosed and the planned date of erasure;

- 8.1.2. **the right to obtain a copy of data** - on this basis the Controller shall provide a copy of the processed data concerning the natural person submitting the request;
- 8.1.3. **the right to rectification** - the Controller shall be obliged to remove any potential inconsistencies or errors of the processed Personal Data and to supplement them if incomplete;
- 8.1.4. **the right to erasure** - on this basis it is possible to demand the erasure of data, the processing of which is no longer necessary for the accomplishment of any of the purposes for which they were collected;
- 8.1.5. **the right to restrict processing** - where such a request is made, the Controller shall cease carrying out operations involving Personal Data - except for operations to which the data subject has given consent and for the storage of the data, in accordance with the accepted principles of retention - or until the reasons for restricting data processing have ceased to exist (e.g., a decision of the supervisory authority permitting further processing);
- 8.1.6. **the right to data portability** - on this basis, in so far as data are processed by automated means in connection with a contract or consent - the Controller shall provide the data supplied by the data subject in a machine-readable format. It is also possible to request that the data be sent to another subject, provided, however, that it is technically possible for both the controller and the designated subject to do so;
- 8.1.7. **right to object to the processing of data for marketing purposes** - the data subject may at any time object to the processing of Personal Data for marketing purposes without having to justify such an objection;
- 8.1.8. **the right to object to other purposes of data processing** - the Data Subject may at any time object to the processing of Personal Data carried out on the basis of the Controller's legitimate interest (e.g., for analytical or statistical purposes or for reasons related to the protection of property) on grounds relating to their specific situation; the objection shall contain a justification in this respect;
- 8.1.9. **right to withdraw consent** - if data are processed on the basis of the consent given, the Data Subject has the right to withdraw such consent at any time, which does not, however, affect the lawfulness of the processing carried out prior to the withdrawal;
- 8.1.10. **the right to complain** - if the processing of Personal Data is considered to be in breach of the provisions of the GDPR or other legislation on the protection of Personal Data, the Data Subject may lodge a complaint with the authority supervising the processing of Personal Data, competent for the Data Subject's place of habitual residence, place of work or place of the presumed breach. In Poland, the supervisory authority is the President of the Personal Data Protection Office.

9. DATA RECIPIENTS

- 9.1. In connection with the provision of services, Personal Data shall be disclosed to external entities, including in particular suppliers responsible for operating IT systems. Entities such as banks and payment operators, accounting services providers, couriers and carriers (in connection with handling the purchase order), marketing agencies (with regard to providing marketing services) and entities related to the Controller, including companies belonging to its capital group.
- 9.2. Since part of the sales processes may be carried out in cooperation with franchisees, trading partners or dealers operating under the Mikomax brand name, the personal data of persons interested in the goods or services offered on the Website may be disclosed to such entities.
- 9.3. The Controller reserves the right to disclose selected information concerning the User to competent authorities or third parties who request such information, based on an appropriate legal basis and in accordance with the provisions of applicable law.

10. TRANSFER OF DATA OUTSIDE THE EEA

- 10.1. The level of protection of Personal Data outside the European Economic Area (EEA) differs from that provided by European law. For this reason, the Controller transfers Personal Data outside the EEA only when necessary and with an adequate level of protection, in particular through:
 - 10.1.1. cooperation with the entities processing Personal Data in the countries in respect of which a decision of the European Commission has been issued ascertaining that an adequate level of protection of Personal Data is ensured;
 - 10.1.2. the use of standard contractual clauses issued by the European Commission;
 - 10.1.3. application of binding corporate rules, approved by the competent supervisory authority;
- 10.2. The Controller shall always inform about the intention to transfer Personal Data outside the EEA at the time of their collection.
- 10.3. The Controller stipulates that to the extent that the Website User is interested in using the services or ordering goods or services through the Website that are to be provided outside the EEA, the transfer of User's Personal Data outside the EEA is necessary for the performance of a contract between the User and the Controller or the implementation of pre-contractual measures taken at the User's request.

11. PERSONAL DATA SECURITY

- 11.1. The Controller shall carry out a risk analysis on an ongoing basis to ensure that the Personal Data are processed in a secure manner - ensuring in particular that only authorised persons have access to the data and only to the extent necessary for the performance of their tasks. The Controller shall ensure that all operations on Personal Data are recorded and performed only by authorized employees and associates.
- 11.2. The Controller shall take all necessary steps to ensure that also its subcontractors and other cooperating entities guarantee the application of appropriate security measures in each case they process Personal Data at the request of the Controller.

12. CONTACT DETAILS

- 12.1. The Controller can be contacted by e-mail: rodo@mikomax.pl or by mail at the address:
ul. Dostawcza 4, 93-231 Łódź.

13. AMENDMENTS TO THE PRIVACY POLICY

- 13.1. The Policy is reviewed and, if necessary, updated on an ongoing basis.
- 13.2. The current version of the Policy has been adopted and is effective as of 15 March 2021.