

PRIVACY POLICY

1. DEFINITIONS

- 1.1. **Controller** – Hortex sp. z.o.o. with its registered office in Warsaw (02-337), at Mszczonowska 2 street.
- 1.2. **Personal Data** - information about a natural person identified or identifiable by one or more specific factors determining physical, physiological, genetic, mental, economic, cultural or social identity, including image, voice recording, contact details, location data, information contained in correspondence, information collected via recording equipment or other similar technology.
- 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 (General Data Protection Regulation).
- 1.5. **Website** – website run by the Controller at www.hortex.pl.
- 1.6. **User** – any natural person visiting the Website or using one or several services or functionalities described in the Policy.

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

- 2.1. In connection with the User's use of the Website, the Controller collects the Personal Data to the extent necessary to provide individual services offered, as well as information about the User's activity on the Website. Detailed rules and purposes of processing Personal Data collected while using the Website by the User are described below.

3. OBJECTIVES AND LEGAL BASIS OF THE PERSONAL DATA PROCESSING AT THE WEBSITE

USING THE WEBSITE

- 3.1. Personal Data of all persons using the Website (including the IP address or other identifiers and information collected via cookies or other similar technologies) are processed by the Controller:
 - 3.1.1. in order to provide the electronic services in the scope of sharing the content at the Website with the Users - the legal basis for processing is the necessity of processing for the performance of the contract (art.6 (1) (b) of the GDPR);
 - 3.1.2. for analytical and statistical purposes - the legal basis for processing is the Controller's legitimate interest (art.6 (1) (f) of the GDPR), consisting on conducting analyzes of Users' activity, as well as their preferences in order to improve the functionalities and services provided;
 - 3.1.3. in order to possibly determine and assert claims or defend against claims - the legal basis for processing is the Controller's legitimate interest (Article 6 (1) (f) of the GDPR), consisting in the protection of its rights.
- 3.2. The User's activity on the Website, including his Personal Data, is recorded in system logs (a special computer program used to store a chronological record containing information about events and activities that relate to the IT system used to provide services by the Controller). The information collected in the logs is processed primarily for purposes related to the provision of services. The Controller also processes them for technical and administrative purposes, for the purposes of ensuring the security of the IT system and management of this system, as well as for analytical and statistical purposes - in this respect, the legal basis for processing is the legitimate interest of the Controller (Article 6 (1) (f) of the GDPR).

CONTACT FORMS

3.3. The Controller provides the opportunity to contact it by using the electronic contact form. Using the form requires providing Personal Data necessary to contact the User and to answer the query. The User may also provide other Data in order to facilitate contact or handle the query. Providing the Data marked as mandatory is required in order to receive and service the query, and failure to do so results in the inability to service. Providing other data is voluntary

3.4. Personal Data are processed:

3.4.1. in order to identify the sender and service his inquiry sent via the provided form - the legal basis for processing is the necessity of processing to perform the contract for the provision of the service (Article 6 (1) (b) of the GDPR); in the scope of optional data, the legal basis for processing is consent (art.6 (1) (a) of the GDPR);

3.4.2. for analytical and statistical purposes - the legal basis for processing is the Controller's legitimate interest (art.6 (1) (f) of the GDPR), consisting on keeping statistics of queries submitted by Users via the Website in order to improve its functionality.

4. SOCIAL MEDIA

4.1. The Controller processes the Personal Data of the Users visiting the Controller's social media profiles (Facebook, YouTube, Instagram). The Data are processed solely in connection with maintaining the profile, including to inform Users about the Controller's activity and to promote various types of events, services and products. The legal basis for the processing of Personal Data by the Controller for this purpose is its legally justified interest (art. 6 (1) (f) of the GDPR), consisting on promoting its own brand.

5. COOKIES AND SIMILAR TECHNOLOGY

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

„SERVICE” COOKIES

5.2. The Controller uses the so-called „service” cookies primarily to provide the User with services provided electronically and to improve the quality of these services. Therefore, the Controller and other entities providing analytical and statistical services use cookies, storing information or gaining access to information already stored in the User's telecommunications terminal device (computer, telephone, tablet, etc.). Cookies used for this purpose include:

5.2.1. cookies with the data entered by the User's (session ID) for the duration of the session (user input cookies);

5.2.2. authentication cookies used for services that require authentication for the duration of the session (authentication cookies);

5.2.3. cookies used to ensure the security, e.g. used to detect fraud in the field of authentication (user centric security cookies);

5.2.4. session cookies of multimedia players (e.g. flash player cookies), for the duration of the session (multimedia player session cookies);

5.2.5. permanent cookies used to personalize the User interface for the duration of the session or a little longer (user interface customization cookies).

6. ANALYTICAL AND MARKETING TOOLS USED BY THE PARTNERS OF THE CONTROLLER

6.1. The Controller and its partners use various solutions and tools used for analytical and marketing purposes. Some basic information about these tools are included below. Detailed information in this regard can be found in the privacy policy of the partner.

GOOGLE ANALYTICS

6.2. Google Analytics cookies are files used by Google to analyze how the User uses the Website, to create statistics and reports on the operation of the Website. Google does not use the collected data to identify the User or combine this information to enable identification. Detailed information about the scope and rules of data collection in connection with this service can be found at: <https://www.google.com/intl/pl/policies/privacy/partners>

GOOGLE ADWORDS

6.3. Google AdWords is a tool that allows to measure the effectiveness of advertising campaigns carried out by the Controller, allowing for the analysis of such data as e.g. keywords or the number of unique users. The Google Adwords platform also allows our ads to be displayed to people who have visited the Website in the past. Information on the processing of data by Google in the scope of the above service is available at: <https://policies.google.com/technologies/ads?hl=pl>.

FACEBOOK PIXELS

6.4. Facebook pixels are a tool for measuring the effectiveness of advertising campaigns implemented by the Controller on Facebook. The tool allows advanced data analytics to optimize the Controller's activities also using other tools offered by Facebook. Detailed information about data processing by Facebook can be found at: https://pl-pl.facebook.com/help/443357099140264?helpref=about_content.

SOCIAL NETWORKS' PLUGINS

6.5. The Website uses plugins of social networks (Facebook, Instagram, YouTube). Plugins allow the User to share content published on the Website on a selected social networking site. The use of plugins on the Website causes that a given social network receives information about the use of the Website by the User and may assign it to the User profile created in a given social network. The Controller has no knowledge about the purpose and scope of data collection by social networks. Detailed information on this subject can be found at: <https://www.facebook.com/policy.php>

7. COOKIES SETTINGS MANAGEMENT

7.1. The use of cookies to collect data, including access to data stored on the User's device, requires the consent of the User. This consent may be withdrawn at any time.

7.2. The consent is not required only for cookies, the use of which is necessary to provide a telecommunications service (data transmission to display content).

7.3. Withdrawing the consent to the use of cookies is possible via the User's browser settings. Detailed information on this subject can be found at:

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

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

7.3.3. Google Chrome:

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

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

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

7.4. The User may at any time verify the status of his current privacy settings for the browser using the tools available at:

7.4.1. <http://www.youronlinechoices.com/pl/twojewybor>

7.4.2. <http://optout.aboutads.info/?c=2&lang=EN>

8. THE TERM OF THE PERSONAL DATA PROCESSING

8.1. The term of the Personal Data processing by the Controller depends on the type of services provided and the purpose of the processing. As a rule, the Data are processed for the duration of the service or order, until the consent is withdrawn or effective objection to data processing is raised in cases where the legal basis for data processing is the legitimate interest of the Controller.

8.2. The term of the Personal Data processing may be extended if the processing is necessary to establish or pursue claims or to defend against the claims, and after that period - only if and to the extent required by the provisions of law. After the end of the processing period, the Data are irreversibly deleted or anonymized.

9. USER'S RIGHTS

9.1. The User has the right to access to the content of the Data and to demand their rectification, deletion, processing restrictions, the right to transfer the Data and the right to object to the Data processing, as well as the right to lodge a complaint to the supervisory body dealing with the protection of Personal Data.

9.2. To the extent that User's Data are processed on the basis of consent, the consent may be withdrawn at any time by contacting the Controller.

9.3. The User has the right to object to the processing of the Data for marketing purposes, if the processing takes place in connection with the legitimate interest of the Controller, as well as - for reasons related to the specific situation of the User - in other cases where the legal basis for data processing is the Controller's legitimate interest (e.g. in connection with the implementation of analytical and statistical purposes).

9.4. More information about the rights arising from the GDPR can be found at: http://sokihortex.pl/wp-content/uploads/2022/01/HORTEX-PERSONAL-DATA-PROCESSING-POLICY_ENG.pdf

10. RECIPIENTS OF THE DATA

10.1. In connection with the provision of services the Personal Data will be disclosed to external entities, including in particular suppliers responsible for operating IT systems, entities like banks and payment service providers, entities providing accounting services, carriers (in connection with the performance of a contract), marketing agencies (in the scope of the marketing services) and the entities related to the Controller, including companies from its capital group.

10.2. The Controller reserves the right to disclose selected information about the User to the competent authorities or the third parties who submit a request for such information, based on the adequate legal basis and in accordance with the applicable law.

11. TRANSMISSION OF THE DATA OUTSIDE THE EEA

11.1. The level of protection of the Personal Data outside the European Economic Area ("EEA") differs from that provided by the European law. For this reason, the Controller transfers the Personal Data outside the EEA only when it is necessary and ensuring an adequate level of protection, primarily through:

11.1.1. cooperation with the entities processing the Personal Data in countries for which an appropriate decision of the European Commission was issued regarding the determination of ensuring an adequate level of protection of the Personal Data;

11.1.2. the usage of standard contractual clauses issued by the European Commission;

11.1.3. applying binding corporate rules approved by the competent supervisory body;

11.2. The Controller always informs about the intention to transfer the Personal Data outside the EEA at the stage of its collection.

12. SECURITY OF THE PERSONAL DATA

12.1. The Controller conducts risk analysis on an ongoing basis to ensure that it processes the Personal Data in a secure manner - ensuring, above all, that only authorized persons have access to the Data and only to the extent that it is necessary due to the tasks they perform. The Controller ensures that all operations on Personal Data are recorded and carried out only by authorized employees and associates.

12.2. The Controller takes all necessary actions so that its subcontractors and other cooperating entities guarantee the application of appropriate security measures whenever they process Personal Data on behalf of the Controller.

13. CONTACT DATA

13.1. The Controller may be contacted via e-mail iod@sokihortex.pl or to the correspondence address: Hortex sp. z.o.o. ul. Mszczonowska 2, 02-337 Warszawa.

13.2. The Controller has appointed a Data Protection Officer who can be contacted via e-mail iod@sokihortex.pl in any matter related to the Personal Data processing.

14. CHANGES TO THE PRIVACY POLICY

14.1. The Policy is reviewed on an ongoing basis and updated as necessary.

14.2. The current version of the Policy has been adopted on 1 December, 2021.