

## PRIVACY POLICY

We are committed to protect your personal data, while you visit our Website <https://peppeshoes.com/> (hereinafter called the "Website").

We kindly ask you to read this document every time you visit our Website, which explains rules of processing your personal data, as you are subject to the Privacy policy every time you visit it.

This Privacy policy sets out e.g. how to contact DAWID BRUŚ PEPPE SHOES, (hereinafter called "the Seller"), as well as how we process data, including how we collect, store and use personal data, our legal bases for processing your personal data, information on transfers to third parties and international transfers, as well as your rights as a data subject.

Thank you for visiting our online shop. Protection of your privacy is very important to us.

DAWID BRUŚ PEPPE SHOES is data controller. You can contact us here [contact@peppeshoes.com](mailto:contact@peppeshoes.com) or +48 721 101 138. Below you will find extensive information about how we handle your data.

Glossary:

Following terms shall have the meaning specified below:

1. **"Privacy policy"** – this document called "Privacy policy";
2. **"Seller"**- Dawid Bruś, owner of DAWID BRUŚ PEPPE SHOES, address: Michałowskiego 28, pl. 23, 42-224 Częstochowa, Poland, NIP 9492064713, REGON 243025693, who is registered in Central Registry and Information about Business Activity (CEIDG);
3. **"Online Store"** – online store run under the following Internet domain: <https://peppeshoes.com/>;
4. **"Customer"** – a natural person (acting for himself/herself or on behalf of a legal person or an entity which is not a legal person but has legal capacity according to law) who uses the Online Store while visiting the website: <https://peppeshoes.com/>, or sends his/her personal data to register the Individual account in the Online Store or to place an order through the Online Store or to subscribe to the Newsletter or to receive a response from the Seller;
5. **"Individual account"** - a panel individually assigned to a Customer who registered his/her personal data in the Online Store system, designated by an individual name (login) and a password given by the Customer; which allows the Customer to use additional functionalities of the Online Store;
6. **"Order form"** - a form by which the Customer orders the Services offered by the Seller through the Online Store, filled by him with the following personal data: name, surname, address, e- mail address, telephone number;
7. **"Account registration"**- a form for the Customer registration in the Online Store, used to create an Individual account via the Online Store through which the Customer provides following data: name, surname, address, e-mail address, telephone number, password;
8. **"Logging in to the Individual account"** – a form used to log in to the Individual

account in the Online Store, by the Customer who made the Account registration – through which the Customer provides following personal data: e-mail address, password;

9. **“Contact form”** – form used by the Customer to contact the Seller in order to obtain specific information regarding customer service or issues connected with technical problems on the Website, placed on the Website under link “Contact us”, through which the Customer provides his e-mail address.
10. **“Services”** – following actions of the Seller which are taken as a result of providing the personal data by the Customer: provision of the Newsletter by electronic communication in case of the Customer’s consent to subscribe to the Newsletter or conclusion of a sale contract between the Seller and the Customer or sending a response to the Customer, related to specific information regarding the customer service or issues connected with technical problems on the Website.
11. **“Newsletter”** – a bulletin regarding novelties and promotions in the Online Store, subscribed to by the Customer according to his consent given by ticking the box “Sign up for our newsletter!” during the Account registration process.

## § 1. Preliminary provisions

1. The Online Store is owned by the Seller.
2. The Privacy policy is in force since 25 May 2018 and sets out e.g. information on how to contact the Seller; rules of collecting, storage and processing by the Seller the personal data collected through the Website of the Online Store by filling the Order form or the Account registration form; sources of obtaining the personal data; a scope and purposes of personal data processing, time of processing the personal data and rights of individuals regarding their personal data.
3. The privacy policy is not addressed to people under 16 years old and we do not knowingly collect personal data from them.
4. The Online Store may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect your data. We do not control those third-party websites and we are not responsible for their privacy policies. When you leave website of our Online Store, we encourage you to read the privacy policy of every website you visit.
5. By accepting the Privacy policy, the Customer declares that he has read the content of it, accepts its terms and agrees to comply with them.

## § 2. Web cookie

1. The Website uses “cookies”. After entering the Website, a message about the usage of cookies appears. The message is visible for the Customer until he accepts the message about the usage of cookies by the Website. An acceptance is given by clicking by the Customer on the inscription: “Accept”.
2. Precise information regarding cookies, which defines cookies and explains the usage of them by the Website is available after pressing by the Customer a field with an inscription: “cookies policy”, which appears simultaneously with the message about the usage of cookies or in an overlap “cookies policy” which appears on the Website.

### § 3. Personal data

1. Personal data is an information about the identified person or about a person which may be identified. It does not include data where the identity has been removed (anonymous data).
2. The Seller is the is the controller and responsible for your personal data.
3. Personal data is processed in accordance with law and with consideration of principles of fairness, transparency and adequacy.
4. On the Website your personal data is not collected or processed in order to transfer or sell it to external entities for the marketing purposes. Neither the Seller send any messages on behalf of third parties.
5. We may collect, use, store or transfer different kinds of your personal data which we have grouped together as follows:

**Identity Data** includes name, surname, date of birth

**Contact Data** includes billing address, delivery address , e-mail address, telephone number

**Transaction Data** includes details about transactions and payments

**Technical Data** includes internet protocol (IP) address, login data, browser type and version, time zone settings and location, browser plug-in types and versions, operating system and other technology on the devices you use to access the Website

**Profile Data** includes your username, password and purchases or orders made by you

**Usage Data** includes information about how your use our Website and Services that you use

**Marketing and Communications Data** includes your preferences receiving marketing and communication from us.

6. As you interact with our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies according to the “cookies policy” available on our Website.
7. Personal data is collected only from personal data subjects through their use of the Online Store.

### § 4. Purposes and basis of processing personal data

1. In case of collecting personal data from the Customer, the data shall be used according to the purpose of granting. We present below purposes/activities of processing your personal data according to the categories of the data, assigned to the legal basis for processing the data.

<b>Purpose/Activity</b>	<b>Type of pesonal data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To create an Individual account	Identity Data Contact Data	Conclusion and performance of a contract with you

To process and deliver your order	Identity Data Contact Data Account Data	Conclusion and performance of a contract with you
To notify you about product availability	Contact Data	Taking actions before conclusion of a contract
To enable you to subscribe to the Newsletter	Identity Data Contact Data	Conclusion and performance of a contract with you Consent to send online commercial information and consent to direct marketing performed by telecommunication, final devices.

To manage our relationship with you: (a) Notifying you about changes to our terms and policies (b) Asking you to leave a review or take a survey	Identity data Contact Data Account Data Marketing and Communication Data	Conclusion and performance of a contract with you Necessary to comply with a legal obligation A legitimate interest of the Controller ( to keep our records updated and to study how Customers use our Services)
To administer and protect our business and this Online Store (troubleshooting and maintenance, data analysis, testing, server management and hosting of data)	Identity Data Contact Data Technical Data	Necessary for our legitimate interests a (for running our business, provision of IT services, ensuring network security, to prevent fraud) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and to study effectivity of advertising campaigns	Identity Data Contact Data Account Data Usage Data Marketing and Communication Data Technical Data	Necessary for our legitimate interests (to study how Customers use our Services, to develop them and grow our business and in purpose of creating marketing strategy)
To provide the Customer with a response concerning specific information regarding to the customer service or issues connected with technical problems on our Website	Identity Data Contact Data	Conclusion and performance of a contract and taking actions before conclusion of a contract

2. Providing personal data is necessary to conclude a contract, and their absence prevents the registration of the account and the execution of orders.
3. One of the ways in which we process your personal data is co-called profiling. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on

what we think you may want or need, or what may be of interest to you. This is how we decide which Services may be relevant for you.

4. You would receive from us commercial information only if you consented to send online commercial information and consented to direct marketing performed by telecommunication terminal devices.

#### § 5. Sharing your personal data and international transfers

1. For purposes indicated in previous paragraph we may share your personal data with the following external third parties, e.g. courier companies, marketing, accounting, IT companies, suppliers providing services such as hosting, cloud computing, e-commerce management, as well as the Tax Office and other public authorities in the Republic of Poland.
2. If the Customer chooses a payment via PayPal or Braintree system, his/her personal data is transferred to the extent necessary for the payment to PayPal (Europe) r.l.et Cie, S.C.A. (R.C.S. Luxembourg B 118 349), which is associated with a possibility of transferring data outside of the European Economic Area, to the United States of America (USA), in which case PayPal is a controller of your data.
3. If the Customer chooses a payment via Tpay.com system, his/her data is transferred to the extent necessary for the payment to Krajowy Integrator Płatności S.A, with its registered seat in Poznań, Św. Marcin Street 73/6, 61-808 Poznań, entered into register of entrepreneurs of the National Court Register maintained by the District Court Poznań – Nowe Miasto and Wilda in Poznań, 8th Commercial Division of National Court Registry, KRS number: 0000412357, NIP 7773061579, REGON 300878437.
4. If the Customer chooses a payment via DotPay system, his/her personal data is transferred to the extent necessary for the payment to Dotpay Sp. z o.o. with its registered seat in Krakowie, ul. Wielicka 72, 30-552 Kraków, entered into register of entrepreneurs of the National Court Register maintained by the District Court Kraków - Śródmieście, 11<sup>th</sup> Commercial Division of National Court Registry, KRS number: 0000700791, NIP: 6342661860, REGON: 240770255, in which case DotPay is a controller of your data.
5. We require all third parties to respect the security of your personal data and to treat it in accordance with law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.
6. Due to the fact that we use services of other providers, e.g. in the field of IT support, your personal data may be transferred out of the European Economic Area. In such cases we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
  - a. a transfer of your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission,
  - b. a use of data protection specific contracts approved by the European Commission which give personal data the same protection it has in Europe or
  - c. where we use provider based in the United States of America, we may transfer data to them if they are part of the *Privacy Shield*, which requires

them to provide similar protection to personal data shared between the Europe and the US.

## **§ 6. Data security**

1. Processing personal data by the Seller takes place in accordance with all rules connected with safety of processing personal data. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality..
2. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **§ 7. Data retention**

1. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for (which means time of execution of an order, management of the Individual Account), unless longer period is required by any legal, accounting or reporting obligation or longer period is necessary to pursue claims resulting from provisions of the Civil Code.
2. Personal data processed for accounting and tax purposes are processed by us for 5 years counted since the end of calendar year in which tax obligation arose.
3. In some circumstances you can ask us to delete your data, according to § 9.
4. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which circumstances we may use this information indefinitely without further notice to you.

## **§ 8. Your legal rights regarding personal data protection. Complaint to the supervisory authority.**

1. Under certain circumstances the Customer has a right to request access to his/her personal data, correction, erasure or restriction of processing and a right to object to processing of his/her personal data which are processed by the Seller. For this purpose the Customer shall send a message to the following e-mail address: [contact@peppeshoes.com](mailto:contact@peppeshoes.com).
2. Please, note that we are not always able to comply with your request regarding erasure of your personal data due to our legal obligations or possible claims. In such circumstances we shall communicate the reason of not erasing the data after your request.
3. The Customer has a right to withdraw his/her consent to processing of his/her personal data anytime, by clicking on deactivation link sent each time in the Newsletter or other commercial message. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. It means that withdrawal of consent concerns the future, not the processing of data which took place in the past, in period of time between giving the consent and its withdrawal.
4. The Customer has a right to request the Seller to transfer his/her personal data which are processed by the Seller to the other personal data controller, unless technical or

organisational requirements do not allow to transmit the data.

5. The Seller without undue delay - and in any case within one month since the receipt of your request – provide the Customer, who lodged a request, inform you about actions taken on the request or about possible extension of time to respond due to the nature of the request or number of requests or about reasons of not taking any actions and about a possibility to lodge a complaint with the supervisory authority and about taking legal remedies in court.
6. You will not have to pay a fee to access your personal data (or to exercise any of the other rights), however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances
7. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.
8. The Customer, whose personal data is processed by the Seller, has a right to lodge a complaint with the supervisory authority, in particular in a member state:
  - a. of his/her habitual residence,
  - b. of his/her place of work, or
  - c. of the place of the alleged infringement,

if the Customer considers that the processing of personal data relating to him or her infringes GDPR. Within the territory of Republic of Poland a complaint shall be lodged with the Office of General Inspector of Personal Data Protection at Stawki 2 Street, 00-193 Warsaw or via the Electronic Inbox of the Office of General Inspector of Personal Data Protection.

## **§ 9. Final provisions, changes to the Privacy Policy, notification of changes**

1. The Seller reserves the right to change the Privacy policy. Change is in force since the day of publishing a new privacy policy on the Website of the Online Store. All important changes of our Privacy policy shall be communicated by an appropriate notification which should appear on the Website.
2. The Seller's contact details are set out under the tab "Contact us" available on the Website.
3. We hereby ask you for a contact in all matters connected with processing of your personal data, via e-mail using the following e-mail address: [contact@peppeshoes.com](mailto:contact@peppeshoes.com) or a telephone number which is indicated under the tab "Contact us" available on the Website.