



## PRIVACY POLICY

### Dear User!

Thank you for your interest in our online shop. Protection of your privacy is very important to us. We highly respect our users and pay utmost attention to respecting their rights, in particular, the right to protect privacy. That is why we are only gathering the absolute minimum of information that helps us better understand the needs of our Internet Service Users and constantly adjust the service, its functionality, and ergonomics to ever-changing expectations. For this reason, among others, we are collecting and processing essential Users' data, including the personal one. In order to better explain the rules and mechanisms applied to your data collection and processing, we have created the below Privacy Policy.

The owner of the Internet Service is collecting personal data, as well as other information, not classified as personal. The collection takes place, depending on the nature of data, based on User's initiative, or automatically.

By using the Internet Service in any way, you accept the rules contained in this Privacy Policy.

### §1 THE CONTROLLER OF PERSONAL DATA

The Controller of your data is WellU Sp. z o.o. based in Poland, Wielkopolska 280, Gdynia registered in Krajowy Rejestr Sądowy (National Court Register), run by Sąd Rejonowy Gdańsk- Północ (District Court Gdańsk - North), 8th Department KRS number 0000354591, NIP 5862251636, REGON 220970076 (further on referred to as the Controller). The Controller is also accessible via e-mail [iod@wellu.eu](mailto:iod@wellu.eu) and phone +48 58 668 12 93.

### §2 PROCESSING OF THE PERSONAL DATA

1. The processing of the following personal data: name, surname, residence address, correspondence address, ID number, e-mail address, phone number will be executed for the purpose of sending via e-mail and via text message information regarding the Controller's offer, based on the distinct consent granted by you. You have a right to withdraw your consent for personal data processing and it shall not affect any processing that was legally conducted before the consent has been withdrawn. You can withdraw the given consent at any moment by sending an e-mail to [info@wellu.eu](mailto:info@wellu.eu) (please indicate the specific consent that you wish to withdraw or specify that you are withdrawing all given consents), it can also be done on our page [www.wellu.eu-account->edit data](http://www.wellu.eu-account-edit-data).

2. The processing of the following personal data: name, surname, address, delivery address, e-mail address, phone number, IP address is essential to fulfil the agreement deriving from the Controller's Shopping Terms, especially to process the orders, attending requests and complaints that you send to us and enabling settlements with the business partners of the subject indicated in p. 5 §2.

3. The processing of the following categories of your personal data: name, surname, address, correspondence address, ID number, email address, settlement intermediary data is essential to fulfil legal obligations imposed on the Controller as defined by the tax regulations.

4. The processing of the following personal data categories: name, surname, address, delivery address, e-mail address, phone number, IP address, order history, business account details, is conducted in order to execute legally justified interests executed by the Controller as means of protection against Your potential claims. Interest is based on the necessity of maintaining evidence in case of any doubts regarding the manner and scope of performance of obligations between the parties. The processing of the above data is conducted to execute Controller's legally justified interests within the scope of the [www.wellu.eu](http://www.wellu.eu) page's analytics of use.

5. The following categories of your personal data resulting from the concluded agreement: name, surname, ID number, address, delivery address, e-mail address, phone number, IP address, order history will be transmitted to the Swiss subject WellU Swiss Group GmbH with a seat in Schulstrasse 14, 9450 Altstätten, Switzerland, entered into Handelsregister des Kantons





ST. Gallen CHE-407.196.596 for the purpose of handling the sales process together with the Controller's partners who recommended you. Furthermore, your data is also shared with the Controller's contractors in order to execute the deal (logistic companies, couriers, payment service operators, telephone operators, IT and accounting companies).

### §3 DATA COLLECTING

#### 1. Data collected during registration:

In order for you to be able to use some of the Internet System functions, you will have to register. During the registration, you will be asked to provide your personal data, as well as other data not classified as such, but included in this Policy.

Providing the data, as well as consenting to their processing is not obligatory (it is voluntary), however, it is necessary to the Owner to provide certain services included in the Internet Service.

Personal data will be processed by the Owner who acts as a personal data controller, for purposes and in ways defined in the statement of consent for personal data processing or in the information enclosed in the relevant regulations. You have a right to inspect and correct your data, as well as to execute other right indicated in the Service's regulations. The above-mentioned matters should be handled by addressing the Owner, sending a letter to the address of their headquarters indicated in the above-mentioned statement.

#### 2. Automatically collected data:

During your visit on the Internet Service pages, some information regarding your visit is automatically collected. These include: your IP address, the domain's name, browser's type, operational system's type – this data does not enable unequivocal identification of your identity.

#### 3. Data collected upon your contact with us:

When you contact us in order to proceed with particular actions (e.g. filing a claim) via the website, phone or email, we will once again require you to provide your personal data in order to confirm your identity and enable us to contact you back. It applies to the same personal data that you have already provided before. Once again, providing this data is not obligatory, but is essential to execute the action, or obtain the information that interests you.

### §4 THE USE OF THE DATA

1. The personal data that you have provided and expressed consent for it to be processed, will be processed only within a scope and for purposes defined in the consent or for the purposes indicated by law.

2. The automatically collected data can be used in order to analyze the users' behaviour on services, as well as to gather demographic data about our users.

3. The data collected as result of the correspondence between you and the Owner shall be used only for the purpose of providing as correct, complete and prompt reply as possible to your query.

4. In the event of violating the Terms and Condition of the Internet Service, both, linked to violating the law, as well as unlinked to it, but based on other regulations, the Owner can share your data, including personal data to the organs of justice in the situations defined by the law.

### §5 THE DURATION AND PLACE OF YOUR DATA PROCESSING

1. The Controller shall also process your above-described data within the territory of Switzerland, which, according to the decision of the European Commission provides appropriate protection to your data.

2. The Controller will continue processing your personal data that is mentioned in point 1 §2 until the consent is withdrawn, the one from point 2 §2 above throughout the period of agreement execution, until the account is deleted and, respectively, until the www page has been exited, from point 3 §2 above during the 6 years period, and from point 4 §2 above during the period of 10 years.





## §6 YOUR RIGHTS

1. You have a right to demand from the Controller the access to your personal data, to correct them, delete or limit the scope of their processing, protest against the processing, as well as the right to data portability;

- as far as the data correction demand is concerned: you notice that your data is incorrect or incomplete;
- as far as the data deletion demand is concerned: Your data is no longer essential for the purpose that it was originally collected for by the Company; you withdraw your consent for data processing; You object to Your data processing; Your data is processed in an unlawful manner;
- as far as the data processing limitation demand is concerned: should you notice that your data is incorrect – you can demand to limit the processing of your data;
- as far as the data transfer demand is concerned: processing of Your data is conducted based on your consent or an agreement concluded with You.

You can execute the above rights in any manner that you wish, including via e-mail at [info@wellu.eu](mailto:info@wellu.eu), by regular mail sent to the Controller's address, or via phone +48 586681293.

2. You have a right to file a complaint against the Controller or the deed of processing Your personal data to the supervisory body, in particular in the European Union Member State of your habitual residence, your place of work or the place where the alleged violation occurred, if you think that the processing of your personal data violates the GDPR regulations. In Poland, the above-mentioned supervisory body is the President of the Office for Personal Data Protection (Prezes Urzędu Ochrony Danych Osobowych).

3. The submission of personal data is voluntary.

4. You have a right to object – due to the reasons related to Your exceptional situation – to the processing of personal data concerning Yourself, that is being conducted based on Your consent or on a legally justified interest of the Controller (see the information above).

In the event of such objection the Controller is not allowed to further process Your personal data, unless the Controller proves the existence of legally valid, justified grounds to process, and they would be superior to Your interests, rights, and freedoms, or if the Controller demonstrates the existence of grounds for determination, investigation or defence of claims.

5. If Your personal data is processed accordingly to the information provided above with the purpose of the direct marketing, you have a right to object, at any moment, to the processing of Your personal data for the purpose of such marketing, including profiling, within the scope to which the processing is linked to such direct marketing. In the event of such objection, the Controller is not allowed to further process Your personal data for such purpose.

6. The above-described objections may be filed in any manner, including via e-mail at [info@wellu.eu](mailto:info@wellu.eu), by regular mail sent to the Controller's address, or via phone +48 586681293.

## §7 CONTACT

How will we be contacting you? – the Owner normally communicates with the Users via email addresses that they provide. At times, when the Owner deems it appropriate or helpful, Users can also be contacted via phone (including text message) or in writing.

## §8 PARTNERS

The Privacy Policy does not apply to entities whose contact data or links appear in our services.

## §9 COOKIE FILES

A cookie is a short information that given server records on your computer's disc in the form of text files. They enable us to measure how popular the service is. We recognize you in order to find out what information do you need and what are you





looking for on our services. We want to know which categories do you visit more often than the others, and thanks to that become an even better and more interesting service than before. It is you who provides us with the knowledge regarding the direction in which we should develop, what are your requirements, what is missing and you think it should be included in the service. Furthermore, cookies are used by the service to maintain the user's session (after login), so that the user does not have to provide the login and password at every subpage; to create statistics that enable us to understand in what way are the user's using the web pages, which facilitates the improvement of their structure and content.

Therefore, by using a service it is mainly you who decides about its future shape. Cookies are in no way harmful to the system on your computer and saved files, they also do not purposefully affect negatively its efficiency nor functionality. The identification occurs impersonally and namelessly and only includes the data concerning way and form of using the service.

Within the service two basic kinds of cookies are being applied:

- session cookies – temporary files that are stored in the user's target device until logging out, exiting the web page or shutting down the program (Internet browser),
- persistent cookies – are the files that are stored in the user's target device for a period of time defined in the cookies parameters or until they are deleted by the user.

Within the service, the following kinds of cookies are being used:

- a) the essential cookies that enable the proper use of the service, e.g. verification cookies used for services that require verification;
- b) the cookie files needed for providing security, e.g. used for detecting abuses in the area of service verification;
- c) performance cookie files that enable gathering information about the way of using the service web pages;
- d) functional cookie files enabling to save settings and interface personalization of the user, eg. In the scope of the selected language and region from which the user comes, the font size, the web page appearance etc.;
- e) advertising cookie files enabling to provide the user with advertising content better adjusted to their interests.

The cookie files may also be used and stored in your target device also by the advertisers and partners co-operating with the Owner.

The acceptance of the cookie files is not obligatory for using the Internet Service and the Owner informs the users, legibly and clearly on the Service's pages about the purpose of storing and accessing cookies, as well as about the possibility of defining by the User the conditions or storing and accessing the cookies with settings of the program installed on the user's device. We indicate that a failure to accept certain cookies will prevent the correct service functioning in its full scope.

You can grant consent to storing cookies on your device and using them in a manner described above by relevant settings of the internet browser that you are using, meaning setting your browser to accept cookies, or if the second applies, not changing the already existing settings after receiving such information, which means the acceptance to receive cookies that are used by the Owner in the manner described above.

In order to not receive the cookies, one should use the settings of the internet browser used for connecting to the service and select an option to automatically reject cookies. These settings usually also allow managing cookies in remaining scope.

Below you will find links to the examples of the official web pages of the producers of most frequently used internet browsers, where an information is placed regarding the activities required to change the settings of a browser in the above-defined scope:

- MS Internet Explorer 9:

<http://windows.microsoft.com/pl-pl/windows7/how-to-manage-cookies-in-internet-explorer-9>

- Mozilla Firefox

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

- Google Chrome

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

- Opera 8.0

<http://help.opera.com/Windows/8.0/pl/cookies.html>





For example, to do so when using older versions of the MS Internet Explorer browser, one should select option "Tools"/"Internet Options"/"Privacy"/"Advanced"/"Block All Cookies". Using an internet browser, a user can also delete cookies already recorded on their device. Using the already mentioned browser one should select "Tools"/"Internet Options"/"General"/"Delete...".

The Owner is not responsible for the content of the cookies sent by other web pages that are linked on the services' pages.

#### **§10 CHANGES TO OUR PRIVACY POLICY**

The Owner's offer will, in time, expand. The technologies, standards, and requirements linked to conducting business on the Internet will be changing as well. It means that in future the Owner might and at times will be forced to making modifications in the Privacy Policy. Changes in the Privacy Policy take place based on the rules established for changes of the Internet Service Regulations.