

PRIVACY AND COOKIES POLICY
for the online store website e-marat.pl

I. Definitions

For the purposes of this document, the following definitions apply:

Joint Controllers / Controllers of personal data -

1. **MARAT Spółka z ograniczoną odpowiedzialnością**, with its registered office in Rybnik, ul. Brzezińska 8A, 44-203 Rybnik, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court in Gliwice, 10th Commercial Division of the National Court Register, under KRS number: 0000124812, NIP: 6422694376, REGON: 276922955, with share capital of PLN 100,000, BDO 000031601;
2. **ELROW Spółka z ograniczoną odpowiedzialnością**, with its registered office in Rybnik, ul. Brzezińska 8A, 44-203 Rybnik, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court in Gliwice, 10th Commercial Division of the National Court Register, under KRS number: 0000182255, NIP: 6422829971, REGON: 278165926, with share capital of PLN 100,000;
3. **WANAR Spółka z ograniczoną odpowiedzialnością**, with its registered office in Rybnik, ul. Brzezińska 8A, 44-203 Rybnik, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court in Gliwice, 10th Commercial Division of the National Court Register, under KRS number: 0000403502, NIP: 6423177950, REGON: 242794863, with share capital of PLN 50,000.

Personal Data - information relating to an identified or identifiable natural person, meaning that on the basis of such information the identity of the person to whom the data relates can be determined, directly or indirectly.

Processing - any operation or set of operations performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collecting, recording, organizing, structuring, storing, retrieving, consulting, or erasing.

Privacy and Cookies Policy / Privacy Policy - this document defining the rules for Processing personal data via the Store, based on and in accordance with the GDPR.

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).

Online Store / Store - the website operating under the domain e-marat.pl.

User - a User or Customer as defined in the Terms & Conditions, whose Personal Data is Processed within the Store and agreements concluded via the Store.

II. General Information

1. The Privacy Policy has been prepared on the basis of and in accordance with all the requirements of the GDPR. In particular, it contains all the necessary information that the Joint Controllers are obliged to provide to a person whose Personal Data they Process and from whom such Data has been collected – pursuant to Article 13 of the GDPR, i.e. the information necessary to ensure fairness and transparency of Personal Data Processing by the Joint Controllers.
2. Terms written with a capital letter but not defined in this Privacy Policy have the meaning assigned to them in the Store's Terms & Conditions, available on the Store's website.
3. The Privacy Policy describes issues related to the Processing of Personal Data only via the Store, including within the framework of distance contracts concluded on the basis of information provided on the Store's website.
4. The Store's website uses encrypted data transmission, which means that it has an SSL certificate (Secure Sockets Layer) – a network protocol used for secure network connections.
5. This version of the Privacy Policy has been in effect since 2025.

III. Joint Controllers of Personal Data

1. The Joint Controllers of Users' Personal Data are:
 - a. **MARAT Spółka z ograniczoną odpowiedzialnością** with its registered office in Rybnik, ul. Brzezińska 8A, 44-203 Rybnik, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court in Gliwice, 10th Commercial Division of the National Court Register, under KRS number: 0000124812, NIP: 6422694376, REGON: 276922955, with share capital of PLN 100,000, BDO 000031601;
 - b. **ELROW Spółka z ograniczoną odpowiedzialnością** with its registered office in Rybnik, ul. Brzezińska 8A, 44-203 Rybnik, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court in Gliwice, 10th Commercial Division of the National Court Register, under KRS number: 0000182255, NIP: 6422829971, REGON: 278165926, with share capital of PLN 100,000;
 - c. **WANAR Spółka z ograniczoną odpowiedzialnością** with its registered office in Rybnik, ul. Brzezińska 8A, 44-203 Rybnik, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court in Gliwice, 10th Commercial Division of the National Court Register, under KRS number: 0000403502, NIP: 6423177950, REGON: 242794863, with share capital of PLN 50,000.
2. The Joint Controllers have appointed a Data Protection Officer. For matters related to personal data, you may contact the Data Protection Officer at the following correspondence address: ul. Brzezińska 8A, 44-203 Rybnik, or via email: **m.szewczyk@grupamarat.pl**.
3. A User may also contact the Joint Controllers regarding their Personal Data using the following means:
 - a. by post: ul. Brzezińska 8A, 44-203 Rybnik;
 - b. by email: **sklep@e-marat.pl**;
 - c. by phone: **+48 32 49 39 039**.

IV. Scope of Processed Personal Data

1. Through the Store, the Joint Controllers may process Personal Data via:
 - a. contact forms (e.g., product inquiry form, general contact form);
 - b. newsletter subscription;
 - c. Account registration and use;
 - d. placing Orders and concluding Distance Sales Agreements;
 - e. ensuring continuity of communication and enabling contact with the Joint Controllers regarding their business activities;
 - f. analytical tools used: Google Analytics 4, Meta Pixel, Hotjar, LinkedIn Insight Tag, Google Tag Manager, Microsoft Clarity;
 - g. marketing tools used: Google Ads, the affiliate tool provided by WebePartners Sp. z o.o., Meta Ads;
 - h. the use of reCAPTCHA tools for protection against spam and bots;
 - i. compliance with legal obligations arising from applicable law, particularly accounting and tax regulations, as well as the General Product Safety Regulation (GPSR).
2. The Joint Controllers may also process Personal Data in situations involving the establishment, pursuit, or enforcement of claims in the event of court proceedings or proceedings before other authorities.
3. All Personal Data that may be processed by the Joint Controllers through the Store are provided by the User voluntarily.
4. The User is not required to provide Personal Data to the Joint Controllers, whether directly (e.g., by registering an Account) or indirectly (via third-party cookies, e.g., Google Analytics). However, failure to provide certain Personal Data may result in the inability to provide a given service or achieve a specific purpose.
5. If, however, the User does provide their Personal Data, the Joint Controllers may process it lawfully and within the limits of the law, in particular in a manner that is adequate under the meaning of the GDPR, i.e., appropriate and limited to what is necessary for the purposes for which it is processed, in line with the principle of data minimization.
6. The detailed legal bases for the processing of Personal Data are specified in the following sections of this Privacy Policy.

V. Personal Data Processed via Contact Forms (e.g., product inquiry form, general contact form)

1. Through contact forms available on the website, such as the product inquiry form located on a product page or the general contact form, the Joint Controllers process the Personal Data you provide when completing the forms. This includes, in particular, the Personal Data required to send a message via the form, i.e.: email address, name, and any other Personal Data provided in the content of the message.
2. The legal basis for processing Personal Data is Article 6(1)(a) of the GDPR, i.e., processing based on the consent of the data subject, for the purpose of receiving the message by the Seller through the form and responding to it.
3. The User's Personal Data processed through the contact forms are processed until the consent to process the data is withdrawn.
4. The User may withdraw their consent to the processing of their Personal Data at any time. Withdrawal of consent does not affect the lawfulness of processing

carried out by the Joint Controllers based on the consent given by the User before its withdrawal.

5. If the User wishes to withdraw their consent for the processing of Personal Data for the purpose of providing the contact form service, they may send an email to the Seller with information about their intention to withdraw the previously given consent.

VI. Personal Data Processed via Newsletter

1. Through the newsletter, which the User may subscribe to via the newsletter subscription form or during the process of placing an Order, the Joint Controllers process the Personal Data provided by the User when completing and submitting the newsletter subscription form or the Order form. This includes, respectively, the email address, and the email address and/or telephone number.
2. The legal basis for processing Personal Data is Article 6(1)(a) of the GDPR, i.e., processing based on the consent of the data subject, for the purpose of sending the newsletter by the Seller to the User's email address or telephone number.
3. The User's Personal Data processed under the newsletter is processed until the consent to process the data is withdrawn.
4. The User may withdraw their consent to the processing of their Personal Data at any time. Withdrawal of consent does not affect the lawfulness of processing carried out by the Joint Controllers based on the consent given by the User before its withdrawal.
5. If the User wishes to withdraw their consent to the processing of Personal Data for the purpose of the newsletter service, they may unsubscribe by clicking the unsubscribe link included in each email sent as part of the newsletter.

VII. Personal Data Processed via User Account

1. Through the Account registration form and Account management on the Store's website, the Joint Controllers process the Personal Data provided by the User when completing the form or updating the Account details, i.e., in particular, the Personal Data required for Account registration: first name, last name, telephone number, and email address.
2. The legal basis for processing Personal Data under the Account registration form is Article 6(1)(b) of the GDPR, i.e., processing necessary to take steps at the request of the User prior to entering into a contract, and processing necessary for the performance of a contract to which the User is a party.
3. The Personal Data processed in connection with the Account is processed until the expiry of the limitation period for claims related to the performance of the contract.

VIII. Personal Data Processed to Ensure Communication Continuity and Contact with the Joint Controllers

1. By enabling contact with the Joint Controllers regarding matters related to their business operations, the Joint Controllers process the Personal Data provided by the User or Client, such as: first name and last name, company name, email address, telephone number, as well as any other Data voluntarily provided by the User or Client in the message content.
2. The legal basis for processing Personal Data in this scope is Article 6(1)(f) of the GDPR, i.e., processing for the purposes of the legitimate interests pursued by the

Joint Controllers, which in this case means ensuring communication continuity and enabling Users or Clients of the Store to contact the Joint Controllers in matters related to business operations.

3. Personal Data processed to ensure contact with the Joint Controllers will be stored for the period necessary to conduct correspondence and achieve the purpose for which the Data was provided, and after achieving that purpose may be further processed for the period resulting from the legitimate interests of the Joint Controllers.
4. The User has the right to object at any time to the processing of their Personal Data for this purpose, which may result in the discontinuation of further correspondence and deletion of the Data, unless another legal basis for further processing exists.

IX. Personal Data Processed under the Sales Agreement

1. As part of concluding a Sales Agreement at a distance via the Store's website, the Joint Controllers process the Personal Data necessary to place an Order and conclude the Agreement, i.e., first name, last name, email address, contact phone number, correspondence address, and bank account number.
2. The legal basis for processing Personal Data in connection with placing an Order and concluding the Agreement is Article 6(1)(b) of the GDPR, i.e., processing necessary to take steps at the request of the User prior to entering into the Agreement, and processing necessary for the performance of a contract to which the User is a party.
3. The User's Personal Data processed under the Order and the concluded Agreement is retained until the expiry of the limitation period for claims related to the Agreement, as specified under the laws currently in force.

X. Personal Data Processed through Analytical Tools

1. The Joint Controllers use analytical tools on the Store's website, such as Google Analytics 4, Meta Pixel, Google Tag Manager, Hotjar, LinkedIn Insight Tag, and Microsoft Clarity.
2. Depending on the tool, the Joint Controllers may process different categories of the User's Personal Data:
 - a. **Google Analytics 4:** IP address (anonymized in the EU), user ID, device ID, viewed pages, clicks, time spent on the site, traffic source, country, city.
 - b. **Meta Pixel:** IP address, User's device data, activity and behavior on the website, location data, language settings.
 - c. **Hotjar:** IP address (anonymized), device and browser data, on-site behavior, analytics data (time spent, subpages visited, sequence of actions), information entered into on-site forms.
 - d. **LinkedIn Insight Tag:** IP address, device ID, browser data, entry source, viewed subpages, actions taken (e.g., clicks), country-level location, advertising attribution data (conversions, post-ad visits).
 - e. **Google Tag Manager:** IP address and User activity. GTM may also transmit personal data processed by the third-party tools it deploys, but does not store such data on its own servers.
 - f. **Microsoft Clarity:** IP address, session ID, User ID, device data, browser, browser language, screen resolution, device type, approximate location, site activity data, and session recordings.
3. The purposes of processing Personal Data via these tools include, in particular:
 - a. **Google Analytics 4** - statistical analysis of website traffic, improving usability,

user segmentation (new vs. returning), and optimizing Store performance.

b. **Meta Pixel** – measuring advertising campaign effectiveness, ad personalization on Meta platforms, Store retargeting, and analyzing User behavior.

c. **Hotjar** – analyzing User behavior, optimizing conversions, monitoring site performance, and improving business goal alignment.

d. **LinkedIn Insight Tag** – measuring LinkedIn ad campaign effectiveness, remarketing, audience building, and conversion tracking.

e. **Google Tag Manager** – managing and deploying tags that enable data collection and activity tracking for integrated tools.

f. **Microsoft Clarity** – analyzing site usage, improving functionality and usability, statistical reporting, error detection, and performance optimization.

4. The legal basis for processing the Personal Data indicated above is **Article 6(1)(a) GDPR** – i.e., processing based on the User’s consent for the specific purpose served by the relevant analytical tool.
5. Users provide consent to processing via the cookie banner (so-called “cookie bar”) displayed when first entering the Store’s website.
6. Users may withdraw their consent at any time without affecting the lawfulness of processing carried out before withdrawal.
7. Consent can be withdrawn at any time by disabling cookies in the cookie settings panel.
8. Retention periods for Personal Data depend on the tool:
 - a. **Google Analytics 4** – from 2 to 14 months (depending on settings) or until consent is withdrawn.
 - b. **Meta Pixel** – up to 90 days or until consent is withdrawn.
 - c. **Hotjar** – up to 14 months or until consent is withdrawn.
 - d. **LinkedIn Insight Tag** – up to 180 days from last interaction or until consent is withdrawn.
 - e. **Microsoft Clarity** – up to 13 months from collection or until consent is withdrawn, whichever comes first.

XI. Personal Data Processed through Marketing Tools

1. The Joint Controllers use marketing tools on the Store’s website, such as **Google Ads**, the **affiliate tool provided by WebePartners Sp. z o.o.**, and **Meta Ads**.
2. Depending on the tool, the Joint Controllers may process the following categories of the User’s Personal Data:
 - a. **Google Ads**: IP address, approximate location (limited to city level), gender.
 - b. **WebePartners affiliate tool**: click identifier, IP address, browser and device technical data, transaction identifier and order value information, email address (if Store configuration provides for its transfer).
 - c. **Meta Ads**: IP address, User or device identifier, ad interactions, clicks, site visits, time spent on the website, age, gender, location, interest-based data derived from User activity on Facebook and Instagram, page likes, and interactions.
3. The purposes of processing Personal Data through these tools are:
 - a. **Google Ads** – running online advertising campaigns to promote the activities of the Joint Controllers and their business operations.
 - b. **WebePartners affiliate tool** – enabling the tracking of transactions made by Users who accessed the Store via affiliate links, in order to settle commissions due to partners participating in the WebePartners affiliate program.
 - c. **Meta Ads** – creating personalized ads tailored to User interests and retargeting

Users who have already visited the Store's website, thereby increasing conversion and engagement.

4. The legal basis for processing the Personal Data mentioned above is **Article 6(1)(a) GDPR**, i.e., processing based on the User's consent for the specific purpose of each tool.
5. Users provide consent to processing via the cookie banner (so-called "cookie bar") displayed when first entering the Store's website.
6. Users may withdraw their consent at any time without affecting the lawfulness of processing carried out before withdrawal.
7. Consent can be withdrawn at any time by disabling the cookies described in this section in the cookie settings panel.
8. Personal Data processed via **Google Ads** and the **WebePartners affiliate tool** are stored for the period specified in the cookie settings configured by the Joint Controllers, or until the User withdraws consent, whichever comes first.
9. Personal Data processed via **Meta Ads** are stored for varying periods depending on the type of data and processing purpose. Data used for analytics and remarketing are typically stored for **30 days to 2 years**, depending on the specific ad configuration, or until the User withdraws consent.

XII. Personal Data Processed through reCAPTCHA

1. The Joint Controllers use the **reCAPTCHA tool**, integrated into the Store's website, to protect it against bots and spam. reCAPTCHA analyzes User behavior and device data to distinguish humans from automated bots.
2. Within reCAPTCHA, the Joint Controllers may process the following User Data:
 - IP address,
 - browser data (type, version),
 - operating system data,
 - device data (e.g., screen resolution),
 - mouse movements, time spent on the website, clicks and scrolling,
 - URL address,
 - data regarding User interactions with website elements.
3. The purpose of processing Personal Data through reCAPTCHA is, among others, to verify whether the website User is a human or a bot and to prevent abuse (e.g., spam).
4. The legal basis for processing the Personal Data described above is **Article 6(1)(a) GDPR**, i.e., processing based on the User's consent, for the purpose served by the reCAPTCHA tool.
5. Consent to processing Personal Data via reCAPTCHA is provided by the User through the cookie banner (so-called "cookie bar") displayed when visiting the Store's website for the first time.
6. The User also has the right to withdraw consent to the processing of their Personal Data at any time, without affecting the lawfulness of processing carried out on the basis of consent prior to its withdrawal.
7. To withdraw consent, the User may disable the cookies described in this section at any time in the cookie settings panel.
8. The data retention period for Personal Data processed through reCAPTCHA may vary depending on the nature of the data and its further use. **Google, as the owner of the tool, does not disclose exact information on how long data collected by reCAPTCHA is stored.**

XIII. Processing of Personal Data to Fulfil Legal Obligations

1. As business entities, the Joint Controllers are subject to a number of legal obligations, such as issuing and settling invoices or meeting product safety requirements under the **General Product Safety Regulation (GPSR)**. In this context, the Joint Controllers process Personal Data necessary to fulfil their mandatory legal obligations, particularly those arising under accounting, tax, and product safety regulations, including the GPSR.
2. The Personal Data referred to in point 1 above may include: name, surname, correspondence address, email address, telephone number, bank account number, and, where applicable, tax identification number (NIP), statistical number (REGON), company name, as well as — in connection with GPSR requirements — user identification data, details of purchased Products, and contact information.
3. The legal basis for processing Personal Data in order to fulfil the Joint Controllers' legal obligations is **Article 6(1)(c) GDPR**, i.e., processing necessary to comply with legal obligations incumbent upon the Joint Controllers, in particular those under accounting and tax law.
4. Personal Data processed in order to fulfil legal obligations will be retained until the expiry of those legal obligations requiring the processing of such Data.

XIV. Processing of Personal Data in Case of Establishing, Pursuing, or Enforcing Claims Arising from the Agreement

1. In the event of a need to establish, pursue, or enforce claims arising from the Agreement, or to defend against such claims in court proceedings or before other competent authorities, the Joint Controllers will process the Personal Data necessary for this purpose, in accordance with applicable law.
2. The Personal Data referred to in point 1 above may include: name, surname, correspondence address, email address, telephone number, bank account number, and, where applicable, tax identification number (NIP), statistical number (REGON), and company name.
3. The legal basis for processing Personal Data in the situation described in this Section is **Article 6(1)(f) GDPR**, i.e., processing necessary for the purposes of the legitimate interests pursued by the Joint Controllers, which consist of establishing, pursuing, or enforcing claims, or defending against potential claims in judicial or administrative proceedings.
4. Personal Data processed for potential claims or disputes will be retained until the expiry of the limitation period for claims arising from the Agreement.

XV. Processing of Personal Data by Other Entities

For the purpose of maintaining the Store's website, conducting analytical and marketing activities that support the Joint Controllers' business operations, as well as for concluding and performing the Agreement, the User's Personal Data may also be processed by the following entities:

- a. entities providing IT and software development services related to the Store's website, acting as data processors;
- b. **Google LLC**, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA – for the use

- of Google tools, acting as an independent controller of Personal Data;
- c. **LinkedIn Ireland Unlimited Company** – for the use of the LinkedIn Insight Tag tool, acting as an independent controller of Personal Data;
 - d. **WebePartners Sp. z o.o.** – acting as a data processor;
 - e. entities providing accounting services, acting as data processors;
 - f. entities providing invoicing software services, acting as data processors;
 - g. **GetResponse S.A.**, based in Gdańsk (NIP: 9581468984) – for the provision of email marketing services, acting as a data processor;
 - h. **Meta Platforms Inc.** – for the use of Meta Ads and Meta Pixel tools, acting as an independent controller of Personal Data;
 - i. **Hotjar Ltd.**, Dragonara Business Centre, 5th Floor, Dragonara Road, Paceville St Julian's STJ 3141, Malta, Registration No: C65490 – for the use of the Hotjar tool, acting as a data processor under a data processing agreement concluded with the Joint Controllers;
 - j. entities providing electronic payment services, acting as separate and independent controllers of Personal Data;
 - k. **Microsoft Corporation**, One Microsoft Way, Redmond, WA 98052-6399, USA, UBI number: 600413485 – for the use of the Microsoft Clarity tool;
 - l. entities providing product delivery services, acting either as separate and independent controllers of Personal Data or as data processors.

XVI. Transfer of Personal Data to Third Countries or International Organizations

1. The Joint Controllers do not directly transfer the User's Personal Data to third countries or international organizations.
2. However, the User's Personal Data may be transferred to third countries by **Google LLC** (Google Analytics and Google Ads), **LinkedIn Ireland Unlimited Company**, **Hotjar Ltd.**, and **Meta Platforms Inc.**, whose tools are used by the Joint Controllers.
3. **Google LLC** is listed among entities participating in the **EU-U.S. Data Privacy Framework**. In accordance with the **European Commission's Implementing Decision (EU) C(2023) 4745 of 10 July 2023** on the adequacy of the protection provided by the EU-U.S. Data Privacy Framework, the protection of Personal Data corresponds to the standards required under EU law.
4. **LinkedIn Ireland Unlimited Company** is certified under the **EU-U.S. Data Privacy Framework**, the **UK Extension to the EU-U.S. Data Privacy Framework**, and the **Swiss-U.S. Data Privacy Framework**. LinkedIn also relies on the **European Commission-approved Standard Contractual Clauses (SCCs)** for certain transfers of Personal Data from the EU/EEA and Switzerland, and on the UK Addendum for data transfers from the UK. These clauses are contractual commitments between companies (e.g., between LinkedIn Ireland Unlimited Company and LinkedIn Corporation or its providers).
5. **Hotjar Ltd.** stores most of the data it collects within the European Union. For Personal Data shared with entities outside the EU, Hotjar applies **Standard Contractual Clauses (SCCs)** to ensure an adequate level of protection.
6. **Meta Platforms Inc.** is listed among entities participating in the **EU-U.S. Data Privacy Framework** (link: <https://www.dataprivacyframework.gov/s/participant-search>), Accordingly, the protection of Personal Data is considered adequate under EU law, in line with the **European Commission's Implementing Decision (EU) C(2023) 4745 of 10 July 2023**

(link: <https://commission.europa.eu/system/files/2023-07/Adequacy%20decision%20EU-US%20Data%20Privacy%20Framework.pdf>).

7. **Microsoft Corporation** may transfer User Data outside the European Economic Area (EEA). Such transfers are carried out in compliance with applicable legal requirements, including the use of **Standard Contractual Clauses (SCCs)** approved by the European Commission to ensure an adequate level of protection. Microsoft Corporation is also listed among entities participating in the **EU-U.S. Data Privacy Framework** (link: <https://www.dataprivacyframework.gov/s/participant-search>), which provides adequate protection under the **European Commission's Implementing Decision (EU) C(2023) 4745 of 10 July 2023**. (link: <https://commission.europa.eu/system/files/2023-07/Adequacy%20decision%20EU-US%20Data%20Privacy%20Framework.pdf>).

XVII. Information on Automated Decision-Making, Including Profiling

The User's Personal Data is **not used** by the Joint Controllers for the purpose of making decisions based solely on automated processing of Personal Data, including profiling, that would produce legal effects concerning the User or similarly significantly affect them.

XVIII. Rights of the User in Connection with the Processing of Their Personal Data

1. Pursuant to Articles 16–21 of the GDPR, the User is granted specific rights with respect to the Personal Data processed by the Joint Controllers.
2. Under these legal provisions, the User has the right to exercise the following rights regarding their Personal Data processed by the Joint Controllers:
 - a. **Right of access** to Personal Data, pursuant to Article 15 GDPR;
 - b. **Right to rectification** of Personal Data, pursuant to Article 16 GDPR;
 - c. **Right to erasure** (“right to be forgotten”), pursuant to Article 17 GDPR;
 - d. **Right to restriction of processing**, pursuant to Article 18 GDPR;
 - e. **Right to data portability**, pursuant to Article 20 GDPR;
 - f. **Right to object** to the processing of Personal Data, pursuant to Article 21 GDPR.
3. More detailed information on these rights can be found directly in Articles 16–21 of the GDPR.
4. Where the processing of the User's Personal Data is based on the User's consent, the User also has the **right to withdraw consent** to the processing of Personal Data at any time, without affecting the lawfulness of processing carried out on the basis of consent before its withdrawal.
5. The User also has the **right to lodge a complaint** with a competent supervisory authority if they believe that their Personal Data is not being processed correctly or in accordance with applicable law.
6. The competent supervisory authority may be the authority in the User's country of permanent residence, their place of work, or the place of the alleged infringement of Personal Data protection.
7. In Poland, the supervisory authority is the **President of the Personal Data Protection Office (PUODO)**.
8. Before lodging a complaint, however, the Joint Controllers encourage the User to contact them first via one of the email addresses indicated in this Privacy Policy,

in order to clarify the matter or resolve any doubts regarding the processing of Personal Data in connection with the Store or the concluded Agreement.

XIX. Cookies – General Information

1. The Store's website uses cookies.
2. Cookies are small text files stored on the User's end device (e.g., computer or mobile phone) when the User visits the Store's website.
3. Cookies may be read either by the Joint Controllers' IT system (**first-party cookies**) or by third-party IT systems (**third-party cookies**).

XX. Cookies and the Processing of Personal Data

1. By reading the User's cookies through the IT system of the Joint Controllers, the Joint Controllers may gain access to information constituting Personal Data. Consequently, such actions result in the Processing of this Personal Data by the Joint Controllers.
2. Certain information, including Personal Data contained in cookies, may also be accessed by the IT systems of third parties.
3. Some of the cookies used by the Joint Controllers are **necessary cookies**, which are essential for the proper provision of electronic services to the User within the meaning of the Act of 18 July 2002 on the Provision of Electronic Services. The use of other cookies is **non-essential**, as they serve purposes not strictly required for the User to properly use the Store (e.g. analytical, functional, or marketing purposes).
4. Non-essential cookies remain blocked until the User grants consent to their use, and thus to the Processing of Personal Data.
5. The consent referred to above may be expressed by the User via the **cookie banner** displayed on the Store's website during the User's first visit.
6. The legal basis for Processing Personal Data through the cookies mentioned above is **Article 6(1)(a) of the GDPR**, i.e. the User's consent, as further described in the sections of this Privacy Policy concerning the rules of Processing Personal Data within analytical and marketing tools.
7. Additionally, within their web browser, the User has the option at any time to manage cookie settings, including blocking their use or re-enabling them.

XXI. Cookies Used on the Store's Website

1. Through the Store's website, the Joint Controllers use both **first-party cookies** and **third-party cookies**.
2. First-party cookies are used to ensure the proper functioning of specific mechanisms available on the website.
3. Third-party cookies are used for the purposes described in the preceding sections, particularly with respect to the Processing of Personal Data through analytical and marketing tools, and include the following:
 - a. **Google Analytics, Google Ads, Google Tag Manager, and reCAPTCHA**, owned by **Google LLC**;
 - b. **Meta Pixel, Meta Ads, and the Facebook social media platform**, owned by **Meta Platforms Inc.**;
 - c. **LinkedIn Insight Tag and the LinkedIn social media platform**, owned by **LinkedIn Ireland Unlimited Company**;
 - d. **Hotjar**, owned by **Hotjar Ltd**;

- e. **Affiliate tool**, owned by **WebePartners Sp. z o.o.**;
- f. **Microsoft Clarity**, owned by **Microsoft Corporation**.

XXII. Final Provisions

1. In matters not regulated by this Privacy Policy, the relevant provisions of Polish law and the GDPR shall apply.
2. The Joint Controllers reserve the right to amend the content of this Privacy Policy, in particular when such changes are required due to modifications related to the Processing of Personal Data on the Store's website, technological changes, or changes in applicable laws relating to the matters described in this document.