

## PRIVACY POLICY

### ETONEESECOSMETICS.COM ONLINE STORE

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#### 1. GENERAL PROVISIONS

1.1 This privacy policy of the Internet Shop is informative, which means that it is not a source of obligation for the Service Recipients or Customers of the Internet Shop. Privacy policy contains mainly rules regarding personal data processing by the Administrator in the Internet Shop, including the basis, purposes and duration of personal data processing and the rights of data subjects, as well as information on the use of cookies and analytical tools in the Internet Shop.

1.2 The Administrator of personal data collected via the Internet Shop is INFINI COSMETIQUES SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ based in Stanisławów Pierwszy (registered office and address for delivery: ul. Jana Kazimierza 279/3, 05-126 Stanisławów Pierwszy); entered in the Register of Entrepreneurs of the National Court Register under KRS number 0000880060; the register court where the company's documentation is kept: District Court for the Capital City of Warsaw in Warsaw, XIV Commercial Division of the National Court Register; share capital amounting to: PLN 5,000; NIP: 5361952730; REGON: 388082431, e-mail address: office@etoneesecosmetics.com - hereinafter referred to as the "Administrator" and being at the same time the Provider of the Internet Shop and the Seller.

1.3 Personal data in the Online Store are processed by the Administrator in accordance with applicable laws, in particular in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals 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) - hereinafter referred to as "RODO" or "RODO Regulation". Official text of the RODO Regulation: <http://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX%3A32016R0679>

1.4 The use of the Online Store, including making purchases is voluntary. Similarly, providing personal data by the Customer or Client using the Internet Shop is voluntary, subject to two exceptions: (1)

conclusion of agreements with the Administrator - failure to provide personal data necessary for the conclusion and performance of a Sales Agreement or an agreement for the provision of an Electronic Service with the Administrator in the cases and to the extent indicated on the website of the Online Shop and in the Terms and Conditions of the Online Shop and this Privacy Policy results in the impossibility to conclude that agreement. Providing personal data in such a case is a contractual requirement and if the data subject wants to conclude a given agreement with the Administrator, he/she is obliged to provide the required data. (2) statutory obligations of the Administrator - providing the personal data is a statutory requirement resulting from universally applicable laws imposing an obligation to process personal data on the Administrator (e.g. processing of data for tax or accounting purposes), and failing to provide such data will prevent the Administrator from fulfilling those obligations.

1.5 The Controller shall exercise due care to protect the interests of the persons whose personal data he/she processes, and in particular shall be responsible for and ensure that the data collected by him/her are: (1) processed lawfully; (2) collected for specified, legitimate purposes and not subject to further processing incompatible with those purposes; (3) substantively correct and adequate in relation to the purposes for which they are processed; (4) kept in a form which permits identification of data subjects for no longer than is necessary to achieve the purpose of processing; and (5) processed in a manner which ensures adequate security of personal data, including protection against unauthorised or unlawful processing and accidental loss, destruction or damage, by means of appropriate technical or organisational measures.

1.6 Having regard to the nature, scope, context and purposes of the processing and the risk of violation of the rights or freedoms of natural persons of varying probability and gravity, the Controller shall implement appropriate technical and organizational measures to ensure that the processing is carried out in accordance with this Regulation and to be able to demonstrate it. These measures shall be reviewed and updated as necessary. The Administrator shall apply technical measures to prevent unauthorized persons from obtaining and modifying, personal data transmitted electronically.

1.7 All words, phrases and acronyms appearing in this Privacy Policy and beginning with a capital letter (e.g. Seller, Online Shop, Electronic Service) shall be understood in accordance with their definitions contained in the Rules of the Online Shop available at the websites of the Online Shop.

## 2. BASIS OF DATA PROCESSING

2.1 The Controller shall be entitled to process personal data in cases where - and to the extent that - at least one of the following conditions is met: (1) the data subject has given his or her consent to the processing of his or her personal data for one or more specified purposes; (2) the processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject prior to entering into a contract; (3) the processing is necessary for compliance with a legal obligation to which the Controller is subject; or (4) processing is necessary for the purposes of legitimate interests pursued by the Controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

2.2 The processing of personal data by the Controller shall in each case require the existence of at least one of the grounds indicated in Point. 2.1 of the Privacy Policy. Specific grounds for processing of personal data of the Internet Shop's Customers and Clients by the Administrator are indicated in the next

point of the privacy policy - with reference to a given purpose of personal data processing by the Administrator.

### 3. PURPOSE, BASIS AND DURATION OF DATA PROCESSING IN THE ONLINE STORE

3.1 Each time the purpose, basis and period as well as recipients of personal data processed by the Administrator result from the actions taken by a given Customer or Client in the Internet Shop or by the Administrator.

3.2 The Administrator may process personal data within the scope of the Internet Shop for the following purposes, on the grounds and for the periods indicated in the table below:

Purpose of data processing	Legal basis of data processing	Okres przechowywania danych
Performing a Sales Agreement or an agreement for the provision of Electronic Services, or taking action at the request of the data subject prior to entering into the above-mentioned agreements	Artykuł 6 ust. 1 lit. b) Rozporządzenia RODO (wykonanie umowy) – przetwarzanie jest niezbędne do wykonania umowy, której stroną jest osoba, której dane dotyczą, lub do podjęcia działań na żądanie osoby, której dane dotyczą, przed zawarciem umowy	Data are stored for the period necessary to execute, terminate or otherwise expire the concluded Sales Agreement or agreement for the provision of Electronic Services.
Direct marketing	Article 6(1)(f) of the RODO Regulation (the Administrator's legitimate interests) - processing is necessary for purposes deriving from the Administrator's legitimate interests - consisting of taking care of the Administrator's interests and a good image of the Administrator, his Internet Shop and striving to sell the Products	The data shall be stored for the period of existence of a legitimate interest pursued by the Administrator, but not longer than the period within which the Administrator's claims against the data subject arising out of the Administrator's business activities are time-barred. The period of limitation shall be determined by law, in particular the Civil Code (the basic limitation period for claims related to business activities is three years, and for a Sales Agreement two years).  The Administrator may not process data for direct marketing purposes in the case of an effective objection to this effect expressed by the data subject.
Marketing	Article 6(1)(a) of the RODO Regulation (consent) - the data subject has consented to the processing of his/her personal data in celach marketingowych przez Administratora	The data is stored until the data subject withdraws his or her consent to further processing for this purpose.
Expressing by the Customer an opinion on the concluded Sales Agreement	Article 6(1)(a) of the RODO Regulation - the data subject has consented to the processing of his/her personal data for the purpose of expressing an opinion	The data is stored until the data subject withdraws his or her consent to further processing for this purpose.

Keeping the books of account	Article 6(1)(c) of the RODO Regulation in conjunction with Article 74(2) of the Accounting Act, i.e. of 30 January 2018. (Journal of Laws of 2018, item 395 as amended) - processing is necessary to fulfill a legal obligation of the Administrator	The data is stored for the period required by law requiring the Administrator to keep accounting books (5 years, counting from the beginning of the year following the financial year to which the data refers).
Determining, pursuing or defending claims that Administrator may assert or that may be asserted against Administrator	Article 6(1)(f) of the RODO Regulation (legitimate interest of the Administrator) - processing is necessary for purposes deriving from the Administrator's legitimate interests - consisting of determining, asserting or defending claims which may be raised by the Administrator or which may be raised against the Administrator	The data are stored for the period of existence of the legally justified interest pursued by the Administrator, however no longer than for the period of limitation of claims that may be raised against the Administrator (the basic limitation period for claims against the Administrator is six years).
Using the website of the Internet Shop and ensuring its proper operation	Article 6(1)(f) of the RODO Regulation (legally justified interests of the Administrator) - processing is necessary for purposes stemming from the Administrator's legitimate interests - consisting in running and maintaining the Online Store website	The data shall be stored for the period of existence of a legitimate interest pursued by the Administrator, but not longer than the period within which the Administrator's claims against the data subject arising out of the Administrator's business activities are time-barred. The period of limitation shall be determined by law, in particular the Civil Code (the basic limitation period for claims related to business activities is three years, and for a Sales Agreement two years).
Conducting statistics and traffic analysis in the Internet Shop	Article 6(1)(f) of the RODO Regulation (legally justified interests of the Administrator) - processing is necessary for purposes stemming from the Administrator's legally justified interests - consisting in statistics and traffic analysis in the Internet Shop in order to improve the functioning of the Internet Shop and increase sales of Products	The data shall be stored for the period of existence of a legitimate interest pursued by the Administrator, however, not longer than the statute of limitations of the Administrator's claims against the data subject on account of the Administrator's business activities. The period of limitation shall be determined by law, in particular the Civil Code (the basic limitation period for claims related to business activities is three years, and for a Sales Agreement two years).

#### 4. RECIPIENTS OF DATA IN THE INTERNET STORE

4.1 For the proper functioning of the Internet Shop, including the performance of Sales Agreements concluded, it is necessary for the Administrator to use the services of external entities (such as e.g. software provider, courier or payment processor). The Administrator shall only use the services of such processors who provide sufficient guarantees to implement appropriate technical and organisational

measures so that the processing complies with the requirements of the RODO Regulation and protects the rights of data subjects.

4.2 Personal data may be transferred by the Controller to a third country, whereby the Controller shall ensure that in such case such transfer is made to a country ensuring an adequate level of protection - in accordance with the RODO Regulation, and in the case of other countries that the transfer is made on the basis of standard data protection clauses. The controller shall ensure that the data subject has the opportunity to obtain a copy of their data. The Controller shall transfer the collected personal data only if and to the extent necessary to fulfill the specific purpose of the processing in accordance with this Privacy Policy.

4.3 The transfer of data by the Administrator shall not take place in every case and not to all recipients or categories of recipients indicated in the Privacy Policy - the Administrator shall transfer data only if it is necessary for the realization of a given purpose of data processing and only to the extent necessary for its realization.

4.4 Personal data of the Customers and Clients of the Internet Shop may be provided to the following recipients or categories of recipients:

4.4.1. carriers / forwarders / courier brokers / entities operating the warehouse and/or the dispatch process - in the case of a Customer who uses the method of delivery of the Product by mail or courier in the Internet Shop, the Administrator makes the collected personal data of the Customer available to the selected carrier, forwarder or broker carrying out the shipments on behalf of the Administrator, and if the shipment is made from an external warehouse - to the entity operating the warehouse and/or the dispatch process - to the extent necessary to complete the delivery of the Product to the Customer.

4.4.2. entities processing electronic or credit card payments - in case of a Customer who uses the electronic or credit card payment method in the Internet Shop, the Administrator shall make the collected personal data of the Customer available to a selected entity processing the aforementioned payments in the Internet Shop on the order of the Administrator to the extent necessary to handle the payment made by the Customer.

4.4.3. crediting entities / lessors - in case of a Customer who uses the instalment or leasing payment method in the Internet Shop, the Administrator makes available collected personal data of the Customer to a chosen creditor or lessor handling the aforementioned payments in the Internet Shop on the order of the Administrator to the extent necessary to handle the payment executed by the Customer.

4.4.4. opinion poll system provider - in case of a Customer who agreed to express his or her opinion on a Sales Agreement, the Administrator shall make available the collected personal data of the Customer to a selected entity providing a system of opinion polls on Sales Agreements concluded at the Internet Shop to the extent necessary for the Customer to express his or her opinion by means of the opinion poll system.

4.4.5. service providers supplying the Administrator with technical, IT and organizational solutions, enabling the Administrator to run its business, including the Internet Shop and the Electronic Services provided by means of it (in particular, suppliers of computer software for running the Internet Shop, e-mail and hosting providers, as well as suppliers of business management and technical support software for the Administrator) - the Administrator shall make the collected personal data of the Customer available to a chosen provider acting on its behalf only in the case and to the extent necessary to realize a given purpose of data processing in accordance with this Privacy Policy.

4.4.6. accounting, legal and advisory service providers providing accounting, legal or advisory support to the Administrator (in particular an accounting office, a law firm or a debt collection agency) - The Administrator provides the collected personal data of the Customer to the chosen provider acting on its behalf only if and to the extent necessary to realize the given purpose of data processing in accordance with this Privacy Policy.

4.4.7. providers of social plug-ins, scripts and other similar tools placed on the website of the Internet Shop enabling the browser of the person visiting the website of the Internet Shop to download content from the providers of the said plug-ins (e.g. logging in using the login data of a social networking site) and to transfer the personal data of the visitor to these providers for this purpose, including:

4.4.7.1 Facebook Ireland Ltd. - The Administrator uses Facebook social plug-ins on the website of the Internet Shop (e.g. Like button, Share or logging in using Facebook login data) and as a result collects and makes available personal data of the Customer using the website of the Internet Shop to Facebook Ireland Ltd. (4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland) to the extent and in accordance with the privacy policy available here: <https://www.facebook.com/about/privacy/> (this data includes information about activities on the website of the Internet Shop - including information about the device, visited sites, purchases, displayed advertisements and use of services - regardless of whether the Customer has a Facebook account and is logged into Facebook).

## 5. PROFILING IN THE ONLINE STORE

5.1 The RODO Regulation imposes an obligation on the Controller to provide information on automated decision-making, including profiling, as referred to in Article 22(1) and (4) of the RODO Regulation, and - at least in these cases - relevant information on the modalities of such decision-making, as well as on the significance and foreseeable consequences of such processing for the Data Subject. With this in mind, the Controller provides information on possible profiling in this section of the privacy policy.

5.2 The Controller may use profiling in the Internet Shop for direct marketing purposes, but decisions taken on its basis by the Controller do not concern conclusion or refusal of the Sales Agreement or the possibility of using Electronic Services in the Internet Shop. The effect of using profiling in the Internet Shop may be e.g. granting a given person a discount, sending him/her a discount code, reminding about unfinished shopping, sending a proposal of a Product, which may suit interests or preferences of a given person or offering better conditions in comparison with the standard offer of the Internet Shop. Despite the profiling, it is the individual who freely decides whether he or she wants to take advantage of the discount received in this way or better conditions and make a purchase from the Online Store.

5.3 Profiling in the Internet Shop consists in automatic analysis or forecast of a given person's behaviour on the website of the Internet Shop, e.g. through adding a particular Product to the basket, browsing the page of a particular Product in the Internet Shop or through analysis of the previous history of purchases made in the Internet Shop. The condition of such profiling is that the Administrator has the personal data of the person in order to be able to send him/her e.g. a discount code.

5.4 The data subject shall have the right not to be subject to a decision which is based solely on automated processing, including profiling, and which produces legal effects with regard to the person concerned or significantly affects him/her in a similar manner.

## 6. RIGHTS OF THE DATA SUBJECT

6.1 Right of access, rectification, restriction, erasure or portability - the data subject has the right to demand from the Controller access to his/her personal data, their rectification, erasure ("right to be forgotten") or restriction of processing and has the right to object to the processing, as well as the right to data portability. The detailed conditions for exercising the rights indicated above are indicated in Articles 15-21 of the RODO Regulation.

6.2 Right to withdraw consent at any time - the person whose data are processed by the Administrator on the basis of an expressed consent (pursuant to Article 6(1)(a) or Article 9(2)(a) of the RODO Regulation), has the right to withdraw the consent at any time without affecting the legality of the processing performed on the basis of the consent before its withdrawal.

6.3 Right to lodge a complaint to the supervisory authority - the person whose data is processed by the Controller has the right to lodge a complaint to the supervisory authority in the manner and according to the procedure set out in the provisions of the RODO Regulation and Polish law, in particular the Act on Personal Data Protection. The supervisory authority in Poland is the President of the Office for Personal Data Protection.

6.4 Right to object - The data subject shall have the right to object at any time - on grounds relating to his/her particular situation - to the processing of personal data concerning him/her based on Article 6(1) (e) (public interest or tasks) or (f) (legitimate interest of the controller), including profiling on the basis of these provisions. The controller shall in that case no longer be permitted to process those personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or grounds for the establishment, exercise or defence of claims.

6.5 Right to object to direct marketing - where personal data are processed for the purposes of direct marketing, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, including profiling, to the extent that the processing is related to such direct marketing.

6.6 In order to exercise the rights referred to in this paragraph of the Privacy Policy, the Administrator may be contacted by sending a relevant message in writing or by e-mail to the address of the Administrator indicated at the beginning of the Privacy Policy or by using the contact form available on the website of the Online Shop.

## 7. COOKIES IN THE INTERNET STORE AND ANALYTICS

7.1 Cookies are small information in the form of text files sent by a server and stored on the side of the person visiting the website of the Online Store (e.g. on the hard drive of your computer, laptop or smartphone memory card - depending on the device used by the visitor to our Online Store). Detailed information about cookies, as well as the history of their creation can be found, among others, here: [https://pl.wikipedia.org/wiki/HTTP\\_cookie](https://pl.wikipedia.org/wiki/HTTP_cookie).

7.2 Cookies that can be sent by the website of the Online Store can be divided into different types, according to the following criteria:

<b>By their provider:</b>  1) their own (created by the Administrator's Internet Store website) and  2) owned by third parties (other than the Administrator)	<b>Due to their storage period on the device of the person visiting the website of the Internet Shop:</b>  1) 1) session files (stored until you log out of the Internet Shop or close your web browser) and  2) 2) permanent (stored for a specified time, defined by the parameters of each file or until manual removal)	<b>Due to the purpose of their use:</b>  1) necessary (enabling proper functioning of the Internet Shop website),  2) functional/preferential (enabling adjustment of the website of the Internet Shop to the preferences of the person visiting the website),  3) analytical and performance (gathering information about the manner of use of the Internet Shop website),  4) marketing, advertising and social (gathering information about the person visiting the website of the Internet Shop in order to display personalized advertisements to this person and conduct other marketing activities, including on websites separate from the website of the Internet Shop, such as social networking sites)
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7.3 The Administrator may process the data contained in Cookies when visitors use the website of the Online Store for the following specific purposes:

<b>Purposes of using cookies in the Administrator's Internet Store</b>	Identify Customers as logged in to the Online Store and show that they are logged in (essential cookies)
	remembering the Products added to the basket in order to place an Order (cookies necessary)
	storing data from completed Order Forms, surveys or login data to the Online Store (essential and/or functional/preferential cookies)
	adjust the content of the Internet Shop to the individual preferences of the Customer (e.g. as regards colors, font size, page layout) and optimise the use of the Internet Shop pages (functional/preference cookies)
	keeping anonymous statistics showing how the website of the Internet Shop is used (analytical and efficiency cookies)
	remarketing, i.e. studying the behavioural characteristics of visitors to the Online Shop through an anonymous analysis of their actions (e.g. repeated visits to specific pages, keywords, etc.) in order to create their profile and provide them with advertisements tailored to their predicted interests, also when they visit other websites in the advertising network of Google Ireland Ltd. and Facebook Ireland Ltd. (marketing, advertising and social networking cookies)

7.4 Checking in the most popular web browsers, which cookies (including the duration of cookies and their provider) are sent now by the site of the Online Store is possible in the following way:



<b>In the Chrome browser:</b>  (1) in the address bar, click on the lock icon on the left, (2) go to the "Cookies" tab.	<b>In Firefox:</b>  (1) in the address bar, click on the shield icon on the left, (2) go to the "Allowed" or "Blocked" tab, (3) click the box for "Site-to-Site Tracking Cookies", "Social Media Tracking Elements" or "Content with Tracking Elements"	<b>In Internet Explorer:</b>  (1) click the "Tools" menu, (2) go to the "Internet Options" tab, (3) go to the "General" tab, (4) go to the "Settings" tab, (5) click the "View Files" box"
<b>In the Opera browser:</b>  (1) in the address bar, click on the padlock icon on the left, (2) go to the "Cookies" tab.	<b>In the Safari browser:</b>  (1) click the "Preferences" menu, (2) go to the "Privacy" tab, (3) click in the "Manage site data" box	<b>Regardless of your browser, using the tools available at, for example:</b> <a href="https://www.cookie-metrix.com/">https://www.cookie-metrix.com/</a> or: <a href="https://www.cookie-checker.com/">https://www.cookie-checker.com/</a>

7.5 By default, most web browsers available on the market accept the storage of cookies. You can determine the conditions for the use of cookies through the settings of your web browser. This means that you can, for example, partially restrict (e.g. temporarily) or completely disable the storage of cookies - in the latter case, however, this may affect some of the functionality of the Online Store (for example, it may not be possible to pass the path of the Order through the Order Form due to not remembering the Products in the shopping cart during the subsequent steps of submitting the Order).

7.6 Browser settings concerning Cookies are important from the point of view of consent for the use of Cookies by our Online Store - according to the regulations such consent can also be expressed through the settings of your Internet browser. Detailed information about changing the settings for Cookies and their independent deletion in the most popular web browsers is available in the help section of the web browser and on the following sites (just click on the link):

in the Chrome browser

Firefox

the Internet Explorer browser

the Opera browser

the Safari browser

in Microsoft Edge browser

7.7 The Administrator can use Google Analytics, Universal Analytics services provided by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland). These services help the Administrator keep statistics and analyse the traffic in the Internet Shop. The collected data are processed within the framework of the above services to generate statistics which help administer the Internet Shop and analyse the traffic in the Internet Shop. These data are of collective character. When using the above services in the Internet Shop, the Administrator collects such data as the source and medium of obtaining visitors to the Internet Shop and the manner of their behavior on the website of the Internet Shop, information about the devices and browsers from which they visit the page, IP and domain, geographical data and demographic data (age, gender) and interests.

7.8 It is possible to block in an easy way a person's access to Google Analytics information about his/her activity on the website of the Online Store - for this purpose, you can, for example, install a browser add-on provided by Google Ireland Ltd: <https://tools.google.com/dlpage/gaoptout?hl=pl>.

## 8. FINAL PROVISIONS

8.1 The Internet Shop can contain links to other websites. The Administrator urges that after navigating to other sites, read the privacy policy established there. This privacy policy applies only to the Administrator's Internet Shop.