

## 1. GENERAL PROVISIONS

- 1.1 This Privacy Policy is for reference only, which means that it does not impose any obligations on the Users or Buyers.
- 1.2 The data controller for your personal data is Natural Pharmaceuticals Sp. z o.o. with its registered office in Warsaw (address: ul. Domaniewska 28, 02-672 Warsaw), entered into the Register of Entrepreneurs kept by the District Court for the Capital City of Warsaw, 13th Commercial Division of the National Court Register under no.: KRS 0000343007, REGON No.: 142128030, NIP (Tax ID No.): 951-229-85-27 (hereinafter referred to as "Natural Pharmaceuticals" or the "Data Controller"). The Data Protection Officer can be contacted at: DPO@natural.pl.
- 1.3 Natural Pharmaceuticals processes personal data in accordance with the generally applicable regulations, in particular in compliance with the 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 (hereinafter referred to as "GDPR") and the national data protection regulations.
- 1.4 Natural Pharmaceuticals shall provide appropriate technical and organisational measures in order to guarantee secure processing of personal data and compliance of the processing with the applicable regulations. Natural Pharmaceuticals shall take appropriate measures in order to prevent unauthorised access to data, personal data security breaches, and data corruption.
- 1.5 We received your data in connection with your purchase, your use of the services of our online shop or other form of contact with Natural Pharmaceuticals, e.g. participation in special offers or subscription of our Newsletter.

## 2. PURPOSE AND LEGAL BASIS FOR DATA PROCESSING

We process your personal data for various purposes, regardless of the purpose, there always has to exist proper legal basis for processing.

- 2.1 Processing of personal data necessary for performance of the contract. The purpose of the processing of your data is to enter into and perform a contract to which you are party or to take steps prior to entering into a contract, including: the sale of goods or services, after-sales service, provision of electronic services, e.g. the handling of your account on the www.natural.pl website and in the www.sklep.natural.pl online shop, expressing opinions, handling various requests and enquiries, and staying in touch with you regarding the above. In such cases, the basis for the processing of your data is its indispensability for the performance of the contract or in order to take steps prior to entering into the contract (Art. 6 para. 1 (b) of GDPR), for a period of time necessary to fulfil orders and provide warranty services, pursuing claims or defence against them
- 2.2 Processing is necessary for compliance with a legal obligation to which the controller is subject. Therefore, in accordance with the applicable regulations, the basis for the processing of your data will also be its indispensability for compliance with a legal obligation to which Natural Pharmaceuticals is subject (Art. 6 para. 1 (c) of GDPR), including in particular: the issuance and storage of invoices and accounting documents, investigating complaints, providing access to data to government authorities and based on the provisions of the law, e.g. for tax and bookkeeping purposes. We keep this personal data used on this legal basis within the time limit prescribed by law.
- 2.3 We also process your personal data for the purposes indicated below, based on the legitimate interests pursued by Natural Pharmaceuticals (Art. 6 para. 1 (f) of GDPR):
  - direct marketing of Natural Pharmaceuticals' products and services;
  - improving the quality of goods or services sold by Natural Pharmaceuticals through requests for feedback or satisfaction surveys;
  - supporting payment services;
  - managing activity on Natural Pharmaceuticals' websites through its monitoring aimed at improving the functionality of service, analysing needs, adjusting advertisements to the previously viewed content;
  - handling messages, opinions or requests when they are not related to the performance of a contract;
  - identifying and preventing fraud and abuse, pursuing claims or defence against them, and conducting proceedings before public authorities or courts of law;
  - creating analyses, statements, statistics, and archives, and ensuring accountability (demonstrating that Natural Pharmaceuticals is in compliance with its obligations resulting from the applicable regulations)
  - analysing your profile, analysing your personal information in order to obtain information about your preferences and interests (for example, we will investigate which offer might be best suited for you).
- 2.4 Processing is based on given consent. If consent to the processing of personal data is given, this consent shall be the basis for the processing of personal data (Art. 6 para. 1 (a) of GDPR) and the content of the consent shall specify the purpose of the processing of data each time. The consent to the processing of personal data may be withdrawn at any time.
- 2.5 Natural Pharmaceuticals processes the following User and Buyer personal data: full name, e-mail address, phone number, delivery address (street name, house number, apartment number, postal code, city, country)/ address of the place of residence / business address / registered office, date of birth/age, sex, bank account.

- 2.6 The provision of your personal data is voluntary, yet failure to provide the personal data indicated above, necessary in order to enter into and perform the Sales Contract, makes it impossible to enter into the Sales Contract. If personal data is collected based on consent, the provision of personal data is voluntary.

- 2.7 Your personal data is not a subject to the automatic processing, which produces legal effects or have a similar significant impact on you.

## 3. PERSONAL DATA TRANSMISSION BEYOND EUROPEAN ECONOMIC AREA

- 3.1 Your personal data will not be transferred beyond the European Economic Area.

## 4. DATA RECEIVERS

- 4.1 In connection with the processing of data for the purposes and on the bases described above, personal data may be disclosed to the following recipients or categories of recipients based on dedicated agreements, within a scope necessary in order to fulfil the purposes listed above:
  - entities participating in the processes necessary for the performance of a contract, including provision of transport of goods, payment services, electronic services;
  - entities providing marketing services to us, advertising agencies;
  - entities handling or supporting our IT systems;
  - entities providing consulting or auditing services to us;
  - public authorities or entities performing public tasks.

## 5. THE RIGHTS OF DATA SUBJECTS

- 5.1 All persons whose personal data are processed by Natural Pharmaceuticals are entitled to the following rights resulting from the GDPR:
  - the right to access personal data (information on data processed by Natural Pharmaceuticals, including the right to obtain a copy of this data);
  - the right to request the rectification (correction) of personal data when the data is incorrect or incomplete;
  - the right to request the deletion of personal data (the so-called "right to be forgotten"), where:
    - data is no longer necessary for the purposes for which they were collected or otherwise processed,
    - the data subject has objected to the processing of data,
    - the data subject has withdrawn the consent on which the processing is based and has no other legal ground for processing,
    - the data is processed illegally,
    - the data must be removed in order to comply with the legal obligation;
  - the right to demand limiting the processing of personal data when:
    - the data subject questions the correctness of personal data,
    - data processing is unlawful and the data subject opposes data deletion, demanding instead to limit them,
    - the Natural Pharmaceuticals no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims,
    - the data subject has objected to the processing of the data – pending the determination of whether the legitimate grounds on the part of the Natural Pharmaceuticals override the grounds opposition;
  - the right to transfer data to another Controller or to you (on the terms set out in Article 20 of the GDPR);
  - if you consent to the processing of personal data, you have the right to withdraw it at any time (withdrawal of consent does not affect the legality of the processing, which was made on the basis of consent before its withdrawal).

### 5.2. The right to object

You may, at any time object, on grounds relating to your particular situation, processing your personal data being processed by Natural Pharmaceuticals based on point (e) or (f) of Article 6(1), including profiling based on these provisions. Natural Pharmaceuticals will no longer process your personal information unless we prove that there are valid legitimate grounds for processing that override your interests, rights and freedoms, or demonstrate that there is a basis for determining, investigating or defending claims.

If we process personal data for direct marketing purposes, you have the right to object at any time to the processing of personal data for such marketing purposes, including profiling, to the extent that the processing is related to such direct marketing. After filing an objection, we will no longer process your data for such purposes.

Realization of the above rights will make it easier for you to submit an application to the address provided in point 1 of this information. If you submit an application, we may ask you for additional information to verify your identity.

### 5.3. Complaint to the supervisory authority

You may lodge a complaint with the supervisory body – the President of the Office for Personal Data Protection, in connection with the processing of personal data by Natural Pharmaceuticals.

## 6. COOKIE FILES (COOKIES) AND SYSTEM INFORMATION (SYSTEM LOGS)

- 6.1 Your web browser automatically transfers data to us in the form of system logs (IT records). It includes information such as the address (URL) of the website you visited previously, the IP address, the version of the browser currently used by your computer, as well as the access time, and amount of data transferred. Controller can analyse the system logs described above. The information obtained in this way is used for administrative purposes (recognising and removing problems with the operation of servers, including breaches of their security) and for statistical analyses.
- 6.2 In running its Online Shop and dedicated product pages, Natural Pharmaceuticals uses cookies for the purpose of improving the sites, taking into consideration User and Buyer needs, and in order to ensure User and Buyer safety while they use these sites. Cookie files make it possible to track the frequency of page views and navigation on the website. In the course of using Controller websites, text files, i.e. cookies, may be stored on your devices. These files contain IT data which are read when you visit our website again and help to adapt it to your preferences and serve statistical purposes.
- 6.3 As part of our online store, we can use the following types of cookies:
- “necessary” cookies, enabling the use of services available as part of an online store, e.g. authentication cookies used for services that require authentication as part of an online store, cookies used to ensure security, e.g. used to detect fraud in the field of authentication within the online store, cookies, enabling the collection of information on the use of website pages,
  - “functional” cookies, enabling “remembering” user-selected settings and personalizing the user interface, e.g. in terms of the language or region of the user’s origin, font size, appearance of the online store, etc.
- 6.4 Data Controller may process data contained in cookies when Users use the Online Shop website or dedicated product pages for the following purposes:
- maintain the session, thanks to which the contents of the website or information about logging in are remembered – thanks to that you do not have to enter your login and password again on each subpage of the website and the contents of the shopping cart from the previous visit are available on each visit to the website;
  - remembering products added to the cart to place an Order;
  - remembering data from order forms and surveys filled out on the sites or Online Shop log-in data;
  - optimising the content of the Online Shop website and dedicated product pages, taking into consideration Users’ individual preferences (e.g. regarding colours, font size, page layout);
  - Analyse the effectiveness of our advertising;
  - carrying out anonymous statistics concerning the use of the Online Shop/dedicated product pages.
- 6.5 Most browsers available in the market accept cookies as standard by default. Everyone may specify the terms of using cookies in the settings of their own browser. This means that it is possible to

partially limit (e.g. in terms of time) or completely disable cookies – however, in the latter case, it may affect certain features of the Online Shop/dedicated product pages. Using our websites without disabling cookies in your browser means that they will be stored in your device memory.

- 6.6 Browser cookie settings are important from the point of view of accepting the use of cookies by the Online Shop/dedicated product pages – in accordance with the regulations, such acceptance may also be expressed through browser settings. If you do not consent to the use of cookies, please adjust your browser cookie settings accordingly.

- 6.7 Information on how to manage cookies is usually found in the “Help” section of each browser; below we describe how to disable cookies in the most popular web browsers:

### Mozilla Firefox

In the “Tools” menu, select “Options”, and then the “Privacy” tab. Your browser allows you to choose between deleting the cookies of individual or all sites.

### Microsoft Internet Explorer

In the “Tools” menu, select “Internet Options”, and then the “Privacy” tab. A special slider can be used to adjust the general level of privacy or the “Websites” button to manage the settings of individual websites.

### Google Chrome

In the menu hidden under the three horizontal bars in the top right-hand corner of your browser, select “Settings”, then “Advanced”. In the “Privacy and Security” section, click the “Content settings” button. You can change your cookie settings in the “Cookies” section.

### Opera

In the “Tools” menu, select “Preferences” and then the “Advanced” tab. Cookies are determined by whether or not you select “Cookies” item.

### Safari

In the “Safari” menu, select “Preferences” and click the “Security” icon. Under “Accept cookies”, you can change your cookie settings.

In mobile phones, tablets, and other mobile devices Each device model can handle cookies in a different way. Therefore, we encourage you to read about the privacy options in the documentation on the website of your mobile device manufacturer.

## 7. FINAL PROVISIONS

- 7.1 This Privacy Policy shall be effective as of 25 May 2018.
- 7.2 This Privacy Policy has been enacted by the Management Board of Natural Pharmaceuticals and is subject to periodic reviews aimed at introducing updates, in particular in the case of changes in the applicable regulations.
- 7.3 Any capitalised words, expressions, and acronyms found on this website shall be construed in accordance with their respective definitions included in the Terms of Use of the Online Shop available on the website of the Online Shop.