

Dnipro-M Stores sp. z o.o. Privacy Policy

1. Purpose of the Privacy Policy

Using the services of the online store available at www.dnipro-m.pl takes place by loading and browsing the website, purchasing, using services or other related facilities, communicating or creating an account, and involves the processing of personal data of persons interacting with the online store. The purpose of this document is to demonstrate the principles of the online store, as well as the rules for handling and processing personal data.

At the same time, it should be noted that this Policy does not describe the processing of personal data in Dnipro-M social media profiles.

The terms and definitions used in this document shall be interpreted as follows:

- **"GDPR"** shall mean Regulation (EU) 2016/679 of the European Parliament and of the Council dated April 27, 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;
- **"Data"** shall mean the personal data of individuals interacting with the online store within the meaning of the General Data Protection Regulation (GDPR);
- **"Global Policy on Use of Cookies and Similar Technologies"** shall mean the document containing key information on cookies and other similar technologies used on websites accessible under the dnipro-m.pl domain, available at https://dnipro-m.pl/ua/pages/cookies_policy/;
- **"We"** and the derivatives thereof shall mean Dnipro-M stores sp. z o.o. with registered office at 21 lok. U3, Adama Branickiego str., Warsaw, 02-972, Poland;
- **"You"** and the derivatives thereof shall mean the user of the online store and other individuals interacting with the online store and other related websites, communications and services.

2. Data Controller

The data controller of the data collected

- through the online store, in particular through the use of cookies, similar technologies or other channels of communication with you;
 - based on your online activity;
- shall be **Dipro-M stores sp. z o.o.** with registered office at 21 lok. U3, Adama Branickiego str., Warsaw, 02-972, Poland (which is also the mailing address), recorded in the register of entrepreneurs of the State Court Register by the District Court of the Capital City of Warsaw, XIII Commercial Division of the State Court Register under No. 0000973167, TIN (NIP): 9512541927, REGON: 522112427, the share capital of PLN 5,000 paid in full.
- Please contact us with data-related questions at the registered office or by email at help@dnipro-m.pl.

3. Purpose and Legal Basis for Data Processing. Consequences of refusing data transfer

Purpose of Data processing	Grounds for Data processing	Consequences of refusing data transfer
<p>- Managing the online store website, through which we provide you with the ability to create, access and use a user account, maintain it and ensure the proper performance of functions related to the account and use of the website, for example, leaving feedback or comments on the website;</p> <p>-Implementation of the purchase agreement for the sale of products or services between you and us, in particular in connection with the fulfilment of orders (placing an order, payment process, insurance, shipment, issuance of sales</p>	<p>The legal basis for processing such data is Article 6(1)(b) of the GDPR.</p> <p>If you enter into a purchase agreement with us (place an order), the data you provide in the order form will be processed for the purpose of executing and settling such agreement or for you to exercise your right to complain or terminate the agreement.</p>	<p>The provision of this data is voluntary, however, refusal to provide the data may prevent or hinder the conclusion or performance of the agreement or our services.</p>

<p>documents, use of guarantees, complaints, termination of the agreement, etc.);</p> <p>-Usage of additional services related to the execution of the fulfillment of orders, for example, delivery of goods, collection of used equipment, assembly, installation, and setup;</p> <p>-Usage of our other services and features available on the website, such as chatbots.</p>		
<p>Fulfilment of legal obligations, including obligations arising from taxation and accounting rules.</p>	<p>The legal basis for processing such data is Article 6(1)(c) of the GDPR.</p>	<p>The right to request data stems from the law, and you are obliged to provide it. Refusing to transfer the data will prevent us from properly executing our legal obligations and may have other legal consequences as the case may be.</p>
<p>Processing submitted requests when they are not directly related to the implementation of the agreement.</p>	<p>The legal basis for processing such data is Article 6(1)(f) of the GDPR. In this case, our legitimate interest includes our right to process your requests.</p>	<p>The provision of data is voluntary, but necessary to process your request.</p>
<p>Communication via the Customer Service Centre (processing of personal data in connection with your communication with our Customer Service Centre).</p>	<p>The legal basis for processing such data is Article 6(1)(f) of the GDPR. In this case, our legitimate interest includes our right to process your requests and communicate with you at your request.</p>	<p>The provision of data is voluntary, but necessary to process your request.</p>
<p>Identification, investigation or defence against legal claims, if necessary.</p>	<p>The legal basis for processing such data is Article 6(1)(f) of the General Data Protection Regulation. The legal basis for processing such data is Article 6(1)(f) of the GDPR. In this case, our legitimate interest includes our right to take steps to identify, investigate or defend against these claims.</p>	<p>The data is collected automatically.</p>
<p>Marketing objectives: we may ask you to leave feedback about our online store, our products and services, we may advertise our products and services, and we may display personalised advertisements or offers that are relevant to your interests. For this purpose, we profile users, which, however, does not affect your rights and freedoms in any way</p>	<p>The legal basis for processing such data is Article 6(1)(f) of the GDPR. In this case, our legitimate interest includes our right to engage in direct marketing activities.</p>	<p>The data is collected automatically.</p>
<p>Providing you with marketing materials (newsletters)</p>	<p>The legal basis for processing such data is Article 6(1)(f) of the GDPR.</p>	<p>The provision of data is voluntary, but necessary if you want to receive marketing information.</p>

	Your email address or phone number will be used to send you commercial information (e.g. a newsletter) to provide you with access to the latest offers of our online store and its partners. Our legitimate interest includes the right to take action for direct marketing purposes.	The newsletter or other commercial information will be sent to you only if you give your additional consent to this (pursuant to the Law on Telecommunications dated July 16, 2004)
Management of the web page of our online store (for example, we collect and store HTTP requests sent to our server, store IP addresses from which users view the information content of our website, URLs of the page previously viewed by the user from which the redirect took place, information about the user's browser)	The legal basis for processing such data is Article 6(1)(f) of the GDPR. In this case, our legitimate interest includes our right to take measures to minimise the risk of events that may have adverse consequences for us	The data is collected automatically.
Detection of possible security threats and ensuring the safe and uninterrupted operation of this website, in particular, detection, prevention and mitigation the consequences of security incidents, cyber attacks and similar malicious acts, and actions that may lead to our liability or cause damage to users	The legal basis for processing such data is Article 6(1)(f) of the GDPR. In this case, our legitimate interest includes the right to ensure the safe and uninterrupted operation of the website of our online store.	The data is collected automatically.
Analytical and statistical purposes to better understand the needs of our customers and the effectiveness of our operations, as well as to improve our services, products and overall customer experience (including using third-party solutions such as Google Analytics, Google BigQuery, Exponea)	The legal basis for processing such data is Article 6(1)(f) of the GDPR. In this case, our legitimate interest includes the right to conduct analytical research to determine the effectiveness of our operations, as well as our right to improve our website, products and services.	The data is collected automatically.
Retargeting/remarketing	The legal basis for processing such data is Article 6(1)(f) of the GDPR. In this case, our legitimate interest includes the right to conduct analytical research to determine the effectiveness of our operations, as well as our right to improve our website or Appx, products and services.	The data is collected automatically.

4. Sources of Data Collection

Sources of Data	Data collection method and data amount
Data collected directly from you (e.g. when you enter data to create an account or in contact forms, provide information about transaction details, when you write product reviews).	You provide data when purchasing goods (e.g., name and surname, address, delivery details, payment details, transaction details, products, price, transaction date, payment methods, discounts provided or used) or when registering an account (e.g. login, email) or contacting us (e.g. information about your claims, complaints, returns, warranties), in your feedback or consents.

<p>Data collected by us automatically (without your direct participation), including event logs.</p>	<p>We collect data automatically when you use or otherwise interact with the online store and our website (for example, items and web pages you viewed or selected, logs, your feedback, information about your device, IP address, information about errors that occurred during an HTTP transaction, the URL of the page previously visited by the User (referrer link) — if the online store website was accessed through a link, information about the user's browser.</p>														
<p>Data received from third parties (partners, social media providers)</p>	<p>We may also receive your personal information from other sources (for example, from partners with whom we jointly offer you goods and services or carry out joint marketing activities).</p> <p>If you choose to create a user account in our online store or log in to our online store with a registered Facebook or Google Account or with an Apple ID, your specific personal data will be transferred to us at your request — more on this below:</p> <table border="1" data-bbox="898 488 2049 863"> <thead> <tr> <th data-bbox="898 488 1281 596">How to create an account</th> <th data-bbox="1281 488 1798 596">Personal data collected from third parties</th> <th data-bbox="1798 488 2049 596">The entity providing the data</th> </tr> </thead> <tbody> <tr> <td data-bbox="898 596 1281 705">Register with a Facebook account</td> <td data-bbox="1281 596 1798 705">Username (public profile), which is publicly available information; e-mail</td> <td data-bbox="1798 596 2049 705">Meta</td> </tr> <tr> <td data-bbox="898 705 1281 783">Register with a Google Account</td> <td data-bbox="1281 705 1798 783">e-mail, phone number</td> <td data-bbox="1798 705 2049 783">Google</td> </tr> <tr> <td data-bbox="898 783 1281 863">Apple ID</td> <td data-bbox="1281 783 1798 863">e-mail, phone number</td> <td data-bbox="1798 783 2049 863">Apple</td> </tr> </tbody> </table>			How to create an account	Personal data collected from third parties	The entity providing the data	Register with a Facebook account	Username (public profile), which is publicly available information; e-mail	Meta	Register with a Google Account	e-mail, phone number	Google	Apple ID	e-mail, phone number	Apple
How to create an account	Personal data collected from third parties	The entity providing the data													
Register with a Facebook account	Username (public profile), which is publicly available information; e-mail	Meta													
Register with a Google Account	e-mail, phone number	Google													
Apple ID	e-mail, phone number	Apple													

5. Data Categories

If Data is collected directly from you, the categories of Data collected will be indicated when you provide us with such Data.

If we collect Data automatically when you use or otherwise interact with the online store, the Data may include the following:

- Information about your interactions with the online store, including the products you browse or compare, the products you add to your chart, information about the date and time, as well as the type of interaction, information about the date and time you log in/out of the online store Shop website, and the web pages you view;
- Information on the date and time of logging in and out of the account and failed login attempts;
- Information on specific products you have purchased (e.g. name, model, type, serial number);
- Information on the device that you use to interact with our online store, such as IP address, browser settings, and device information (e.g. IMEI).

6. Data Recipients. Third Parties

The Data may be provided to our service providers and suppliers, such as IT service and solution providers, marketing agencies, legal entities involved in the fulfilment of your orders, such as courier or postal companies, our advisors, such as legal, tax or accounting advisors, or insurance brokers, banks, insurance companies and other financial institutions, as well as service providers and cooperators, in particular those who facilitate payments, for example, card payments.

In addition, the Data may be disclosed to courts and governmental authorities (e.g. the tax authorities) if it is necessary in order to defend legal claims or to protect our legal interests, or if required by law.

7. Will the Data be Transferred Outside the European Economic Area?

Your data may be transferred to countries outside the European Economic Area where the standards of personal data protection differ from those of the European Union and which may not provide an adequate level of protection of your personal data due to the failure to implement certain security measures aimed at protecting personal data.

In the event that we transfer data to a third country for which the European Commission has not issued a decision on an adequate degree of protection, we will take appropriate measures to ensure that such transfers are in compliance with applicable law, in particular, we will apply the appropriate security measures specified in Article 46(2)(c) and (d) or Article 49 of the GDPR (in particular, data transfers necessary for the agreement). You may obtain a copy of the relevant security measures by contacting us at the address set out in Section 2 above.

In particular, the following data transfers may be made to countries outside the European Economic Area:

The third country the data may be transferred to	The presence or absence of the European Commission's decision on the adequacy of the measures or a reference to a relevant or acceptable provision (e.g. Standard Contractual Clauses)
Ukraine	Standard Contractual Clauses

8. Data Processing Period

We have implemented principles and methods that are compatible with the principle of data minimisation as stipulated by the GDPR rules so that we do not process unnecessary and redundant data. We strive to ensure that our database does not contain any data that is not necessary for the correct fulfilment of our obligations and the exercise of the rights and freedoms of the users.

We will retain your data for as long as necessary for the purposes of collecting this data. Once the legal basis for data processing expires, we will delete your data immediately.

The above means that, in essence:

- The data provided by you to create an account in the online store will be processed for as long as you maintain your account and, thereafter, for the statutory limitation period for claims related to the maintenance of your account;
- The data collected in connection with a specific order / agreement will be processed for the duration of the fulfilment of the obligations under the order / agreement and for the statutory limitation period for any claims related to the order / agreement;
- The data collected for the purpose of fulfilling the manufacturer's warranty will be processed for the duration of the warranty and after its expiry, within the statutory limitation period for any claims related to the warranty.
- The data collected for marketing purposes will be processed for the duration of the marketing activities unless you object to the processing data for these purposes in advance.
- The data collected for the purpose of sending the newsletter will be processed for the duration of the newsletter service and until you withdraw your consent to the newsletter.
- The data collected to respond to your request/demand will be processed until the request/demand is fulfilled, as well as within the statutory limitation period.

- The data collected for analytical and statistical purposes will be processed for the period necessary to achieve the objectives related to the effective functioning and development of the online store.
- The data that we collect automatically when you use or otherwise interact with the online store and its website will be stored for the period necessary to achieve the purpose of processing. If the Data is processed pursuant to your consent to its processing, the Data will be stored for no longer than until your consent is withdrawn.
- The data we process for identifying, investigating or defending claims will be processed for the period necessary to achieve this purpose, no longer than until the expiry of the statutory limitation period.
- We will retain the relevant data for the period provided for by the relevant provisions of the Data Controller's national laws, in case the obligation to retain the data arises from the law (e.g. taxation and accounting rules).

9. What Rights do You Have in Relation to the Processing of Your Data?

You have the right to withdraw your consent to the processing data for direct marketing purposes (e.g. for the newsletter), including profiling at any time (without explanation or justification).

PLEASE NOTE! To withdraw your consent, please contact us at the address/email/phone number set out in section 2 above or, in the case of a newsletter, as instructed in the newsletter you receive. Withdrawal of your consent will not affect the lawfulness of the processing that took place prior to the withdrawal of the consent.

Your right	Additional information
Right to object to the processing your Data (where the processing is based on the legitimate interest of the Data Controller)	<p>You have the right to object to the processing of your data for a particular purpose based on our legitimate interests at any time, for reasons relating to your particular situation.</p> <p>PLEASE NOTE! In some cases, we may not be able to take into account your objection due to other legitimate grounds for processing data that override your interests, rights and freedoms, or if the data processing is necessary for the identification, enforcement or defence of claims.</p> <p>If your objection relates to the processing of data for marketing purposes, no justification is required on your part and such an objection will be taken into account.</p>
The right to withdraw consent (where consent is the basis for processing)	
The right to access data	<p>You have the right to receive confirmation from us whether we are processing your Data, and if so, you have the right to receive information regarding the purpose of the processing, the categories of the Data processed, the Data recipients, and the period of processing.</p> <p>You also have the right to request copies of the data processed.</p>
The right to request data rectification	You have the right to request correction of the data if it is inaccurate or incomplete.

<p>The right to request deletion of data</p>	<p>You have the right to request the Data to be deleted, in particular: if the Data is no longer necessary for the purposes for which it was collected or otherwise processed; you revoke the consent being the basis for processing unless there is another legal basis for processing; you object to the processing pursuant to Article 21(1) of the GDPR and there is no overriding legal basis for processing, or you object to the processing pursuant to Article 21(2) of the GDPR; the Data was processed unlawfully.</p> <p>PLEASE NOTE! We may refuse to delete your data despite your request if one of the exceptions mentioned in the GDPR applies, for example, when processing your data is necessary for us to comply with a legal obligation or to identify, investigate or defend legal claims.</p>
<p>The right to request the data processing to be restricted;</p>	<p>You have the right to request a restriction of data processing in the following cases: you dispute the accuracy of the Data — in this case, you may request a restriction for a period to allow us to verify the accuracy of the Data; the processing is unlawful and you object to the deletion of Data and instead request a restriction of its use; we no longer need the Data for the purposes of the processing, but you need it for the identification, investigation or defence of legal claims; you have objected to the processing pursuant to Article 21(1) of the GDPR in the course of verifying whether our legitimate grounds override yours.</p>
<p>The right to request data transfer</p>	<p>You have the right to receive the data concerning you that you have provided to us in a structured, commonly used and machine-readable format and the right to transmit the data to another data controller without hindrance from us if the data processing is based on your consent or on an agreement and if the processing is carried out by automated means.</p> <p>You have the right to transfer the Data directly from us to another data controller where technically feasible.</p>

The possibility of exercising the above rights may depend on the basis on which a particular category of Data is processed and the conditions specified in the GDPR. In case of refusal to fulfil your request, you will receive a response along with the reasons for the refusal.

You also have the right to lodge a complaint with the supervisory authority, which in Poland is the President of the Personal Data Protection Office <https://uodo.gov.pl/>

10. Automated Decision-making. Profiling

We may use an automated decision-making mechanism by analysing reviews and comments posted by you on our website to block customers' reviews/comments (e.g. those containing offensive language). This being the case, you may contact our call centre (the Customer Service Centre) to exercise your right to express your opinion and/or appeal against such a decision.

We may use your Data to create your consumer profile for the purpose of using your profile for direct marketing purposes, in particular to personalise the advertising displayed to you.

We may also use your data to provide you with personalised offers.

11. Security

We have taken extensive efforts to ensure that your data is properly secured, including:

- we carry out the necessary risk analysis for data processing operations or data categories,

- we carry out a data protection impact assessment where the risk of violation of the rights and freedoms of individuals is high due to the nature of the data or the location of its storage,
- we tailor data protection measures to the level of risks identified,
- we have internal information security management procedures,
- we have procedures in place to identify, assess and report detected data breaches to the Personal Data Protection Authority - Incident Management.

If you notice or suspect a breach of your data protection or the rules for the safe operation of the Appx or the website of our online store, please report such an incident at help@dnipro-m.pl marked "Personal Data" or "Incident" immediately.

12. Amendments to the Privacy Policy

We will regularly review this Privacy Policy and amend it whenever it becomes necessary or desirable due to new regulations, new guidelines of regulatory authorities overseeing data protection processes, and best practices in the field of data protection. We also reserve the right to amend this Privacy Policy in the event of a change in the technology we use for the data processing (if the change affects the wording of this Privacy Policy), as well as in the event of a modification of the ways, purposes or legal grounds for our processing of data.

Date of the last amendment: April 06, 2023.