

Privacy notice

I. Definitions:

- 1) **Website Administrator (Administrator)** – Agnieszka Wicherek, conducting business activity under the name SOUNATURE AGNIESZKA WICHEREK, with its registered office in Żory, os. Pawlikowskiego 14J, app. 2, NIP: 6511695503 , REGON: 523505382;
- 2) **Cookies** – IT data, in particular text files, which are stored on the User's end device. Cookies usually contain the name of the website from which they originate, the time of their storage on the end device and a unique number;
- 3) **Personal Data** - means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 4) **Social media** – Facebook.com portal and Instagram.com on which the Administrator has his fanpage;
- 5) **Sales platform** – portals Allegro.pl, Etsy.com, Amazon.pl, Allegro Lokalnie.pl, Amazon.de, Amazon.com, through which the Administrator sells its goods, within the European Union and outside its borders;
- 6) **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) ;
- 7) **Website** – an organized IT and information platform, connected to the Internet, created by the Website Administrator, at www.sounature.com;
- 8) **User** - a natural person using the Website and using the Administrator's services.
- 9) **GPSR** - Regulation (EU) 2023/988 of the European Parliament and of the Council of 10 May 2023 on general product safety.
- 10) **ADO** - Personal Data Controller.

II. General information.

This Privacy notice sets out the rules for the processing and storage of personal data provided by Users in connection with the use of the Administrator's services through the www.sounature.com website (Website) and also through Sales Platforms and Social Media.

III. Information on data processing.

- 1) The Controller of personal data of Users using the Website and of Users using the Administrator's services via Sales Platforms and Social Media is Agnieszka Wicherek, conducting business activity under the name SOUNATURE AGNIESZKA WICHEREK with its registered office w Żorach, os. Pawlikowskiego 14J, app. 2.
- 2) The Data Controller can be contacted by post to the address indicated in point 1) above or by e-mail to the following address: hello@sounature.com.
- 3) The Website does not use cookies – it does not obtain information about Users and their behavior by saving cookies in end devices.
Information about Users is obtained by the Data Controller through Sales Platforms and through contact via Social Media.

IV. Personal Data.

When using the Administrator's services, the User voluntarily provides his or her personal data. The data provided by the User may include:

- name and surname
- address
- address for shipment of the order
- e-mail address
- telephone number
- payment details
- details of the ordered product
- other data necessary to complete the order, including information regarding a personalized product.

V. Purposes and basis for data processing.

The data provided via the Sales Platforms will be processed:

- 1) in order to conclude and perform a contract for the sale of products, based on such concluded contract (the basis of Article 6(1)(b) of the GDPR);
- 2) in order to consider complaints on the basis of the obligation resulting from the Act of 30 May 2014 on consumer rights (the basis of Article 6 (1)© of the GDPR);
- 3) in order to fulfill the Controller's obligations resulting from applicable regulations, in particular in the field of accounting and tax law (the basis of Article 6 (1) (c) of GDPR);
- 4) in order to answer questions and conduct communication with Users, which is the implementation of the legitimate interest of the Controller (the basis of Article 6 (1) (f) of the GDPR);
- 5) for evidential purposes being the implementation of the legitimate interest of the Controller, securing information in the event of a legal need to prove facts (Article 6 (1) (f) of the GDPR);

- 6) in order to establish, pursue claims or defend against claims, which is the implementation of the legitimate interest of the Controller (the basis of Article 6 (1) (f) of the GDPR).

Data provided via Social Media and e-mails will be processed in order to:

- 1) determining the requirements for personalized products, presenting an offer – in order to take steps at the request of the data subject prior to entering into a contract (Article 6 (1) (b) of the GDPR);
- 2) in order to answer questions and conduct communication with Users, which is the implementation of the legitimate interest of the Controller (the basis of Article 6 (1) (f) of the GDPR);
- 3) in order to conclude and perform a contract for the sale of products, based on such concluded contract (the basis of Article 6(1)(b) of the GDPR);
- 4) in order to consider complaints on the basis of the obligation resulting from the Act of 30 May 2014 on consumer rights (the basis of Article 6 (1)© of the GDPR);
- 5) in order to fulfill the Controller's obligations resulting from applicable regulations, in particular in the field of accounting and tax law (the basis of Article 6 (1) (c) of GDPR);
- 6) for evidential purposes being the implementation of the legitimate interest of the Controller, securing information in the event of a legal need to prove facts (Article 6 (1) (f) of the GDPR);
- 7) in order to establish, pursue claims or defend against claims, which is the implementation of the legitimate interest of the Controller (the basis of Article 6 (1) (f) of the GDPR)
- 8) in order to keep the Controller's profiles in Social Media, including, but not limited to informing Users about the Controller's activity and to promote services and products, which is the implementation of the Controller's legitimate interest (the basis of Article 6 (1) (f) of the GDPR).

Implementation of Legal Obligations Regarding Product Safety (GPSR):

1. HANDLING PRODUCT SAFETY COMPLAINTS BY THE DATA CONTROLLER (ADO) SUBMITTED BY CONSUMERS IN CONNECTION WITH RIGHTS ARISING FROM THE GPSR.
 - a) Data processed: Name, surname, email address, phone number (and, if applicable, personal data included in the content of the complaint). Providing the data is voluntary but necessary to achieve the purpose.
 - b) Purpose of processing: Handling product safety complaints submitted by consumers in connection with rights arising from the GPSR and implementing corrective measures in case of a dangerous product.
 - c) Data retention period: No longer than 5 years.
 - d) Legal basis: Article 6(1)(c) GDPR, meaning your personal data will be processed due to the necessity of fulfilling a legal obligation imposed on the Data Controller.

e) Rights: In connection with the processing of personal data contained in the complaint, you have the right to request access to and rectification of your data. For data processed in connection with the Data Controller's legal obligation, you cannot object to data processing or request data deletion until the expiration of the above-mentioned term, which cannot exceed 5 years, as specified in the GPSR.

2. RECORDING PRODUCT SAFETY COMPLAINTS SUBMITTED BY CONSUMERS IN INTERNAL REGISTERS OF COMPLAINTS AND CASES OF DANGEROUS PRODUCT RECOVERY.

a) Data processed: Name, surname, email address, phone number.

b) Purpose of processing: Recording product safety complaints submitted by consumers in connection with rights arising from the GPSR in internal complaint registers.

c) Data retention period: No longer than 5 years.

d) Legal basis: Article 6(1)(c) GDPR, meaning your personal data will be processed due to the necessity of fulfilling a legal obligation imposed on the Data Controller regarding maintaining registers of product safety.

e) Rights: In connection with the processing of personal data contained in the complaint, you have the right to request access to and rectification of your data. For data processed in connection with the Data Controller's legal obligation, you cannot object to data processing or request data deletion until the expiration of the period necessary to fulfill the above-mentioned obligations, which cannot exceed 5 years.

3. IMPLEMENTATION OF CORRECTIVE MEASURES, INCLUDING DANGEROUS PRODUCT RECOVERY PROCEDURES OR SAFETY WARNINGS.

a) Data processed: Name, surname, email address, phone number.

b) Purpose of processing: In cases where the Data Controller must implement corrective measures, including dangerous product recovery procedures or product safety warnings, the personal data of consumers provided in prior orders made via the online store or included in the notification of a dangerous product will be processed to execute these procedures and fulfill the legal obligations imposed on the Data Controller under the GPSR. This also applies to cases requiring the transfer of consumer data in a notification submitted by the Data Controller through the Safety Business Gateway in connection with a dangerous product.

c) Data retention period: No longer than 5 years.

d) Legal basis: Article 6(1)(c) GDPR, meaning your personal data will be processed due to the necessity of fulfilling a legal obligation imposed on the Data Controller regarding the implementation of corrective measures, including dangerous product recovery procedures or product safety warnings for the consumer.

e) Rights: In connection with the processing of personal data related to prior orders via phone, email, Facebook, Instagram, Allegro, Etsy, Amazon, or provided in the notification of a dangerous product, you have the right to request access to and rectification of your data. For data processed in connection with the Data Controller's

legal obligation, you cannot object to data processing or request data deletion until the expiration of the period necessary to fulfill the above-mentioned obligations, which cannot exceed 5 years.

VI. Recipients of the Personal Data.

- 1) The Controller may share the User's Personal Data with subcontractors, e.g. accounting companies, IT specialists, hosting companies, and these entities process the entrusted data on the basis of relevant contracts.
- 2) The data may also be shared with payment operators and postal operators and courier companies.
- 3) The administrator may be obliged to provide the collected information to authorized entities on the basis of lawful requests to the extent resulting from the request and applicable law.
- 4) In the case of contacting the Controller via Social Media, Users' data will be transferred to the owner of the Facebook and Instagram social networking sites - Meta Platforms Ireland Limited - on the terms regarding personal data set out by Meta, available at <https://www.facebook.com/about/privacy> and <https://privacycenter.instagram.com/policy>.

VII. The period for which the personal data will be stored.

- 1) The User's personal data, which are processed in order to conclude and perform the contract concluded with the Controller will be stored for the duration of the contract, and then until the claims arising from this contract shall expire.
- 2) The User's personal data processed for the purposes of pursuing legitimate interests will be stored until the Controller's interests are accomplished or until the effective objection to data processing for this purpose due to the specific situation of the User, and in the case of a Facebook and Instagram profile – no longer than for the period when the User observes the Controller's profile.
- 3) The data processed in order to fulfill obligations arising from legal provisions will be processed for the period indicated in these provisions.

VIII. User's rights regarding the processing of personal data.

According to GDPR, the User has the right:

- 1) of access to personal data;
- 2) to rectification of inaccurate personal data concerning him or her;
- 3) to erasure, right to restriction of processing or right to object;

- 4) to data portability;
- 5) to lodge a complaint with a supervisory authority.

In order to exercise the above rights vested in the Controller, please contact us at the address of the registered office or e-mail address indicated in point III 1).

IX. The right to object (where the processing is based on point (e) or (f) of Article 6(1)).

The User has the right to object to the processing of his or her data, processed for the purposes indicated in point V above on the basis of the legitimate interest of the Controller. The Controller will cease to process data for these purposes, unless the Controller is able to demonstrate that there are valid, legitimate grounds that override the User's interests, rights and freedoms or the User's data will be necessary to establish, pursue claims or defend against claims.

X. Transfer of personal data to a third country.

- 1) Personal data may be transferred to a third country or an international organization in the case of using the Controller's services via Sales Portals and Social Media, in which the flow of data is transnational.
- 2) Facebook and Instagram may transfer your data outside the European Economic Area. In accordance with the "Data Policy" (<https://www.facebook.com/about/privacy/update>, <https://privacycenter.instagram.com/policy/>), Meta Platforms Ireland Limited transfers personal data of users of its applications, including fanpages run by the Controller, to the USA on the basis of standard contractual clauses approved by the European Commission.
- 3) For Etsy.com Portal Users located outside of North or South America, Etsy Ireland UC is the data controller of personal information. By using this site, you agree that Etsy Ireland UC may share some of the information it collects with Etsy, Inc., its U.S. parent company, or other affiliates of Etsy for the purposes described in this privacy policy located at <https://www.etsy.com/pl/legal/privacy?ref=dropdown>. User Data is transferred by Etsy Ireland UC outside of the EEA based on European Commission approved Standard Contractual Clauses.
- 4) The data of Amazon.com Portal Users will be processed by Amazon.com, Inc. outside EEA on the terms set out in the Privacy Policy located at: <https://www.amazon.com/gp/help/customer/display.html?nodeId=GX7NJQ4ZB8MHFRNJ&pop-up=1>.
- 5) The data of Users using the Amazon.de Portal may be transferred outside the EEA on the terms set out in the Privacy Policy located at:

https://www.amazon.de/gp/help/customer/display.html?nodeId=GX7NJQ4ZB8MHFRNJ&pop-up=1#GUID-9DFA0CFF-9E83-4207-8EE5-5B1B8CFC3F4A__SECTION_3A0141C2C92D4FA6AE690AE679210C93.

- 6) The data of Users using the Amazon.pl Portal may be transferred outside the EEA on the terms set out in the Privacy Policy located at: https://www.amazon.pl/gp/help/customer/display.html?nodeId=GX7NJQ4ZB8MHFRNJ&ref_=footer_privacy.

XI. Links to other websites.

For the convenience of Users, links to other websites appear on the Website. Such websites operate independently of the Website and are in no way supervised by the sounature.com Website. These websites have their own privacy and data processing policies and regulations, which you should read.

The information collected as part of the Facebook and Instagram Pixel is anonymous and allows us to check what actions the User takes as part of our website. However, Facebook and Instagram may combine this information with other information collected about you, regarding your use of these services and use it for their own purposes, including marketing. Detailed information on this subject can be found in the privacy policy of portals on the following websites: <https://www.facebook.com/about/privacy> and <https://privacycenter.instagram.com/policy>.

XII. Privacy notice Update.

The Administrator reserves the right to change or update the Privacy notice, which may be affected in particular by the development of Internet technology, possible changes in the law on the protection of personal data and the development of services provided by the Administrator. The Administrator will inform about any changes and updates in a comprehensible and visible manner on the Website.

XIII. Contact.

If you have any questions or comments regarding this Privacy notice, please contact us by e-mail at hello@sounature.com

Information in writing can also be sent to the correspondence address:
Agnieszka Wicherek, conducting business activity under the name SOUNATURE AGNIESZKA WICHEREK, with its registered office in Żory, os. Pawlikowskiego 14J, app. 2.