

Privacy and Cookie Policy

First things first—we're thrilled that you've visited our website, smarrr.com, and that you care about how we process your personal data. Below, you'll find the purposes, legal bases, and duration of personal data processing, specified separately for each purpose of data processing.

First, we want to emphasize that your data is safe with us. We ensure the confidentiality of all data provided to us, protect it from unauthorized access, and take appropriate security and data protection measures required by data protection laws.

1. General Information.

1.1. The controller of your personal data is Emweo Michał Wójciak, with its registered office at ul. Rusałki 19/21 in Piotrków Trybunalski, Tax ID (NIP) 7712686581. If you have any questions regarding this privacy policy, you may contact us at any time by sending an email to contact@smarrr.com.

1.2. The 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) grants you the following rights regarding the processing of your personal data:

- a) the right to access your data and receive a copy of it,
- b) the right to rectify (correct) your data,
- c) the right to erasure (if you believe there is no legal basis for us to process your data, you may request that we delete it),
- d) the right to restrict data processing (you may request that data processing be restricted solely to storage or to performing actions agreed upon with you),
- e) the right to object to data processing (you have the right to object to data processing based on a legitimate interest; you should indicate a specific situation that, in your opinion,

justifies our cessation of the processing covered by the objection. We will cease processing your data for these purposes unless we demonstrate that the grounds for our processing of the data override your rights or that your data is necessary for us to establish, pursue, or defend claims),

- f) the right to data portability (you have the right to receive from us, in a structured, commonly used, machine-readable format, the personal data you have provided to us on the basis of a contract or your consent; you may instruct us to send this data directly to another entity),
- g) the right to lodge a complaint with a supervisory authority (if you believe that we are processing data unlawfully, you may lodge a complaint regarding this matter with the President of the Personal Data Protection Office or another competent supervisory authority).

The rules governing the exercise of the rights listed above are described in detail in Articles 16-21 of the GDPR. Please note that you may also contact us to request information about what data we hold about you and for what purposes we process it. Simply send an email to contact@smarrrr.com

1.3. Your personal data may be processed by third parties whose services we use. They may have access to your personal data if the services they provide involve or may involve the processing of personal data to the extent related to such access. This includes, in particular, entities such as hosting providers, email service providers, website technical support providers, law firms, marketing service providers, accounting firms, cloud software providers, etc. Please note that your data is secure and processed only to the extent necessary. Furthermore, if necessary, your personal data may be disclosed to entities, authorities, or institutions authorized to access data under applicable law, such as police and security services, courts, prosecutors' offices, as well as tax authorities to the extent necessary to fulfill tax, settlement, and accounting obligations.

1.4. We transfer your personal data to third countries in connection with the use of tools that store personal data on servers located in third countries, specifically in the United States. The providers of these tools guarantee an adequate level of personal data protection through appropriate compliance mechanisms provided for by the GDPR or the use of standard contractual clauses. The storage of personal data on servers located in third countries occurs as part of Google services (described in this privacy policy), provided by Google Ireland Limited, and as part of the MailerLite mailing system.

1.5. We use tools that may take specific actions depending on the information collected through tracking mechanisms (profiling and behavioral advertising). However, we believe that these actions do not have a significant impact on you, as they do not differentiate your situation as a customer and do not affect the terms of the contract you may enter into with us.

2. Purposes and activities of personal data processing.

2.1. Contact.

Data processed: first name, email address, plus any data contained in the message (providing this data is voluntary but necessary to establish contact.)

Purpose of processing: establishing contact

Retention period: The content of correspondence may be archived, and we are unable to specify exactly when it will be deleted.

Legal basis: Article 6(1)(f) of the GDPR, i.e., our legitimate interest. The legal basis for processing after the end of the contact is also our legitimate interest in archiving correspondence for internal purposes (Article 6(1)(f) of the GDPR). Rights: You have the right to request a copy of the correspondence you have had with us (if it has been archived), as well as to request its deletion, unless its archiving is justified by our overriding interests, e.g., defense against potential claims on your part.

2.2. Newsletter.

Data processed: first name and email address (providing this data is voluntary but necessary to subscribe to the newsletter).

Purpose of processing: sending the newsletter. The mailing system we use tracks your actions in connection with the messages sent to you. Consequently, we have information about which messages you opened, which links you clicked within the messages, etc.

Processing period: the duration of the newsletter service, as well as for archiving purposes to demonstrate that you previously consented to receiving the newsletter.

Legal basis: consent (Article 6(1)(a) of the GDPR) provided when subscribing to the newsletter.

Rights: You may unsubscribe from the newsletter at any time by clicking the dedicated link included in every newsletter message or by simply contacting us. You may correct your data or object to the processing of your personal data. Due to our legitimate interest (Article 6(1)(f) of the GDPR), we will not delete your data from the database. Deleting such data would prevent us from demonstrating that you previously consented to receiving the newsletter.

2.3. User account.

Data processed: email address and password (providing this data is voluntary but necessary to create an account. You may provide additional data when editing your account details.)

Purpose of processing: to provide you with an electronic service consisting of enabling you to use your user account.

Processing period: You may delete your account at any time. If you decide to do so, your data will continue to be stored in the database so that we can identify you as a returning user in the future should you decide to use the website again as a registered user. In this regard, the legal basis for the processing of your personal data is our legitimate interest—Article 6(1)(f) of the GDPR.

Legal basis: a contract concluded in accordance with the terms described in the Terms of Service

- Article 6(1)(b) of the GDPR.

2.4. Orders.

Data processed: data necessary to fulfill the order, i.e.: first and last name, billing address, company details, email address, phone number, tax ID number. (Providing this data is voluntary but necessary to place an order.)

Purpose of processing: performance of the contract concluded by placing an order, issuing an invoice and recording it in accounting records, archival and statistical purposes, and direct marketing of our own products and services.

Processing period: the time necessary to fulfill the order, and then until the expiration of the statute of limitations for claims arising from the concluded contract.

After this period expires, the data may still be processed by us for archival or statistical purposes, e.g., to identify a returning customer, as well as for direct marketing of our own products and services until an objection is raised.

Legal basis: performance of the contract concluded by placing an order (Article 6(1)(b) of the GDPR), issuance of an invoice (Article 6(1)(c) of the GDPR), inclusion of the invoice in accounting records (Article 6(1)(c) of the GDPR), direct marketing of our own products and services (Article 6(1)(f) of the GDPR), and for archival and statistical purposes (Article 6(1)(f) of the GDPR).

Rights: In the case of order data, you cannot request the rectification of this data after the order has been fulfilled. You also cannot object to the processing of data or request the deletion of data until the statute of limitations for claims arising from the concluded contract has expired. Similarly, you cannot object to the processing of data or request the deletion of data contained in invoices. You may object to the processing of data for the purposes of direct marketing of products and services.

2.5. Recovering abandoned shopping carts. Data processed: email address

Purpose of processing: To enable you to complete your order. (For this purpose, we process your personal data collected by us in connection with your initiation of the ordering process.)

Processing period: You may object to the processing of your data for the purpose of recovering abandoned shopping carts by clicking the link provided in the message sent as part of the abandoned shopping cart recovery process.

Legal basis: legitimate interest (Article 6(1)(f) of the GDPR).

2.6. Complaints and withdrawal from the contract.

Data processed: first and last name, residential address, phone number, email address, bank account number. Providing this data is voluntary but necessary to file a complaint or withdraw from the contract.

Purpose of processing: to carry out the complaint procedure or the contract withdrawal procedure

Processing period: the time necessary to carry out the complaint procedure or the withdrawal procedure. Complaints and statements of withdrawal may also be archived for the purpose of being able to demonstrate the course of the complaint process or withdrawal in the future

Legal basis: For the purpose of processing a complaint or a withdrawal request (Article 6(1)(c) of the GDPR), and subsequently for archival purposes, which constitutes our legitimate interest (Article 6(1)(f) of the GDPR).

Rights: With regard to data contained in complaints and statements of withdrawal from the contract, you do not have the right to rectify this data. You also cannot object to the processing of data or request the deletion of data until the statute of limitations for claims arising from the concluded contract has expired. However, after the statute of limitations for claims arising from the concluded contract has expired, you may object to our processing of your data and request the deletion of your data from the database.

2.7. HANDLING BY THE DATA CONTROLLER OF COMPLAINTS REGARDING PRODUCT SAFETY SUBMITTED BY CONSUMERS IN CONNECTION WITH RIGHTS UNDER THE GPSR.

Data processed: first name, last name, email address, phone number (and, if applicable, personal data contained in the complaint). Providing this data is voluntary but necessary to achieve the purpose.

Purpose of processing: handling complaints regarding product safety submitted by consumers in connection with rights arising from the GPSR and implementing corrective measures in the case of a dangerous product.

Retention period for personal data: no longer than 5 years. Legal

basis: Article 6(1)(c) of the GDPR, meaning your personal data will be processed due to the need to comply with a legal obligation incumbent on the Controller.

Rights: In connection with the processing of personal data contained in the complaint, you have the right to request access to the data and to have it corrected. In the case of data processed in connection with

the fulfillment of a legal obligation by the Data Controller, you may not object to the processing of the data or request its erasure until the expiration of the aforementioned period specified by the General Data Protection Regulation (GDPR), i.e., a period that may not exceed 5 years.

2.8. RECORDING IN THE INTERNAL COMPLAINT REGISTER AND THE REGISTER OF SAFETY PRODUCT RECALLS - COMPLAINTS REGARDING PRODUCT SAFETY REPORTED BY CONSUMERS

Data processed: first name, last name, email address, phone number. Purpose of processing: recording in internal registers of complaints regarding product safety reported by consumers in connection with rights under the GPSR.

Retention period for personal data: no longer than 5 years. Legal basis: Article 6(1)(c) of the GDPR, meaning your personal data will be processed due to the need to fulfill a legal obligation incumbent on the Controller regarding the maintenance of product safety records.

Rights: In connection with the processing of personal data contained in the complaint, you have the right to request access to the data and to have it corrected. In the case of data processed in connection with the Data Controller's fulfillment of a legal obligation, you may not object to the processing of the data or request its erasure until the period necessary for the fulfillment of the Data Controller's aforementioned obligations has elapsed, i.e., a period that may not exceed 5 years.

2.9. IMPLEMENTATION OF REMEDIAL MEASURES, INCLUDING PROCEDURES FOR RECALLING A HAZARDOUS PRODUCT OR ISSUING A PRODUCT SAFETY WARNING.

Data processed: first name, last name, email address, phone number. Purpose of processing: in the event that the Data Controller needs to implement corrective measures, including procedures for the recall of a product or a product safety warning, consumers' personal data stored in connection with a previously placed order in the online store or provided by the consumer in a notification regarding a dangerous product will be processed for the purpose of implementing the aforementioned procedures and fulfilling the legal obligations incumbent upon the Data Controller under the GPSR. As well as in the event

the need to transfer the consumer's data in a notification submitted by the Data Controller via the Safety Business Gateway in connection with a dangerous product.

Retention period for personal data: no longer than 5 years. Legal basis: Article 6(1)(c) of the GDPR, meaning your personal data will be processed due to the need to fulfill a legal obligation incumbent upon the Controller regarding the implementation by the Data Controller of corrective measures, including the procedure for recalling a dangerous product or issuing a product safety warning to the consumer.

Rights: In connection with the processing of personal data stored by the Data Controller in relation to a previously placed order in the online store or indicated in a notification regarding a dangerous product, you have the right to request access to the data and to have it corrected. In the case of data processed in connection with the fulfillment of a legal obligation by the ADO, you may not object to the processing of the data or demand its deletion until the expiration of the period necessary for the fulfillment of the aforementioned obligations of the ADO, i.e., a period that may not exceed 5 years.

3. Cookies

3.1. Cookies and other tracking technologies. Our website uses cookies.

Cookies are small text files stored on your device (e.g., computer, tablet, smartphone) that can be read by our IT system (first-party cookies) or by third-party IT systems (third-party cookies). Some of the cookies we use are deleted at the end of your web browser session, i.e., when you close it (so-called session cookies). Other cookies are stored on your device and allow us to recognize your browser the next time you visit the site (persistent cookies).

3.2. Consent to Cookies.

- During your first visit to the website, you will see a message about the use of cookies along with a request for your consent to use these cookies.
- You can always change your cookie settings in your browser or delete cookies entirely. Browsers manage cookie settings in different ways. You can find instructions on how to change your cookie settings in your browser's help menu.

- You can also manage your cookie settings by installing special add-ons that allow you to control cookies.
- Disabling or restricting cookies may cause difficulties in using our website, as well as many other websites that use cookies.

3.3. Server logs.

- Using the website involves sending requests to the server where the website is hosted. Every request sent to the server is recorded in the server logs.
- The logs include, among other things, your IP address, the server date and time, and information about the web browser and operating system you are using.
- The logs are recorded and stored on the server. The data recorded in the server logs is not associated with specific individuals using the website and is not used by us to identify you.
- Server logs serve solely as auxiliary material for website administration, and their contents are not disclosed to anyone other than those authorized to administer the server.

3.4. Google Analytics.

- We use the Google Analytics tool provided by Google LLC, based in the USA.
- The purpose is to generate and analyze statistics to optimize our websites.
- The data collected is not personal data and does not allow for your identification. The information we have access to through Google Analytics includes, in particular: information about the operating system and web browser you use, the subpages you view on our website, the time spent on our website and its subpages, and the source from which you access our website.
- Within Google Analytics, we use advertising features such as demographic and interest reports, your age range, gender, approximate location, and interests determined based on your online activity.
- In order to use Google Analytics, we have implemented a special Google Analytics tracking code in our website's code. The tracking code uses cookies from Google LLC related to the Google Analytics service.

3.5. Google Ads.

- We use the Google Ads advertising program operated by Google LLC,
- The purpose is to run advertising campaigns, including remarketing campaigns, based on a legitimate interest consisting of marketing our own products or services.
- The data collected is not personal data and does not allow for your identification.
- When you visit our website, a Google remarketing cookie is automatically stored on your device. This cookie uses a pseudonymous identifier (ID) and, based on the pages you visit, enables the display of interest-based ads.
- Further processing of this information only takes place if you have given Google your consent to link your browsing and app usage history to your account and to use information from your Google account to personalize the ads displayed on websites.
- If you are logged in to Google while visiting our website, Google will use your data in conjunction with Google Analytics data to create and define target audience lists for cross-device remarketing purposes. To this end, Google temporarily combines the collected information with Google Analytics data to create target groups.
- To use Google Ads, we have implemented a special Google Ads conversion pixel in our website's code. The pixel uses Google LLC cookies related to the Google Ads service. You can disable these cookies directly on our website using the cookie management tool. You can manage your ad settings directly on the Google website:
<https://adssettings.google.com/>.
- Details regarding data processing within Google Ads can be found at: <https://policies.google.com/privacy>.

3.6. Facebook Ads and Insights.

- We use marketing and analytics tools available through Facebook (Meta Platforms Inc., based in the U.S.).

- The purpose is to market our own products or services, as well as for analysis and statistics.
- We have implemented the Facebook Pixel on our website, which automatically collects information about your use of our site, including the pages you view, in order to deliver personalized ads tailored to your behavior on our site.
- The information collected via Facebook Pixel does not allow us to identify you. It only allows us to see what actions you have taken on our website. We can also determine your age range, gender, and the location from which you are connecting to the Internet.
- For details on Facebook's privacy policy, visit: <https://www.facebook.com/privacy/expLanation>.

3.7. Social media tools.

- Our website uses plugins and other social media tools provided by social media platforms such as Facebook, Instagram, and Twitter.
- When you view our website containing such a plugin, your browser establishes a direct connection to the servers of the social media administrators (service providers). The plugin's content is transmitted by the respective service provider directly to your browser and integrated into the page. Through this integration, the service providers receive information that your browser has accessed our website, even if you do not have a profile with the respective service provider or are not currently logged in. This information (along with your IP address) is transmitted by your browser directly to the provider's server (some servers are located in the U.S.) and stored there. If you are logged in to one of the social media platforms, that provider will be able to directly associate your visit to my website with your profile on that social media platform.
- You can also completely prevent plugins from loading on the site by using appropriate extensions for your browser, such as script blocking.
- Logging out of the social media platform before visiting our website prevents the data collected during your visit to our website from being directly linked to your profile on that platform.

- If you use a specific plugin, e.g., by clicking the "Like" or "Share" button, the corresponding information will also be transmitted directly to the provider's server and stored there.
- The purpose and scope of data collection, as well as the further processing and use of the data by the service providers, along with contact options, your rights in this regard, and the ability to configure settings to protect your privacy, are described in the privacy policies of the respective service providers. Facebook - <https://www.facebook.com/Legal/FBWorkPrivacy>, Instagram - <https://help.instagram.com/155833707900388>, Twitter - <https://twitter.com/en/privacy>

3.8. Google Tag Manager.

- We use the Google Tag Manager tool provided by Google LLC.
- Google Tag Manager is used to manage website tags via an interface. With the help of Google Tag Manager, we monitor our advertising campaigns and how you use our websites.
- Google Tag Manager only implements tags. Its use does not involve the storage of cookies or the collection of personal data. This tool enables the operation of other tags, which may collect data under certain circumstances. However, Google Tag Manager does not have access to this data.
- If the tracking option has been disabled at the domain or cookie level, this will apply to all tracking tags implemented via Google Tag Manager.
- We carry out these activities based on our legitimate interest in marketing our own products or services and optimizing our websites.

3.9. Hotjar.

- We use the Hotjar tool provided by Hotjar Limited.
- Hotjar records every visitor to our website and allows us to play back a video of their activity on our site, as well as generate so-called heatmaps.

- The Hotjar tool does not record the process of filling out forms, and therefore we do not have access to information that allows us to identify you.
- We carry out these activities based on our legitimate interest in compiling and analyzing statistics to optimize our websites.

3.14. Content from external websites.

- Content from external services, in particular videos from YouTube, is embedded on our websites.
- In this regard, cookies from Google LLC related to the YouTube service are used, including DoubleClick cookies.
- You can prevent data collected while watching videos or viewing other content on our website from being directly linked to your profile on a particular service by logging out of that service before visiting our website, or by blocking scripts, for example.
- YouTube-related cookies are only loaded when a video is played; therefore, refraining from watching the video prevents them from being loaded
- The purpose and scope of data collection, as well as its further processing and use by service providers, and your other rights in this regard are described in the privacy policies of the respective service providers.

Please note that if any information we provide regarding privacy policies or cookies is unclear to you, we are available to assist you at the following email address contact@smarrrr.com