

Privacy policy of the inicla.com website

This privacy policy has been adopted in accordance with the provisions of 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 (Official Journal of the European Union No. L 119/1 of 4.5.2016; hereinafter: GDPR). The purpose of the policy is, in particular, to comply with the information obligation referred to in Articles 13 and 14 of the GDPR.

1. Definitions

In the content of this policy, we use the following phrases:

Website – a website run by INICLA at the address inicla.com;

We, INICLA, Administrator - Ms. Beata Wontor conducting business activity under the name INICLA Beata Wontor (hereinafter: as INICLA), entered into the Central Registration and Information on Economic Activity (CEIDG), NIP: 5471152203, REGON: 526463170, at the address: Bliska 1a lok. 2, 43-316 Bielsko-Biała, e-mail address info@inicla.com phone number, +48 880 217 227

You, Mrs., Client – persons whose personal data are processed by INICLA in connection with the use of the Website.

2. Who is the Data Controller?

A data controller is a person who determines the purposes and means of the processing of personal data. The controller of your personal data is INICLA.

3. Whose personal data do we process?

In connection with our business, we process in particular the personal data of Website users. The scope of the processed data is each time adequate to the purposes of processing.

4. What data we collect through the Website, as well as for what purpose we use it?

The scope of your data that we collect and the purposes of their processing depend on the functionalities of the Website used, and so:

4.1. Browsing the Website

I. What data we collect?

Data stored in the form of server logs, in which the user is identified as a URL. This data includes:

- a) the time of arrival of the request,
- b) the time it takes to send a response,
- c) IP address information.

II. For what purpose we process data?

For the purposes of administering the server on which the Website is stored.

III. Do you have to provide us with your data??

Providing data is voluntary, with the proviso that it determines the possibility of proper use of the Website.

IV. On what legal basis do we process your data??

On the basis of:

- a) the concluded agreement, the subject of which is a service provided electronically in the form of providing access to the Website (Article 6(1)(b) of the GDPR),
- b) our legitimate interest (Article 6(1)(f) of the GDPR) – consisting in the possibility of making the Website available to third parties, as well as guaranteeing the correct display of the Website.

V. Who we may share your data with?

Personal data may only be disclosed to third parties if we are obliged or entitled to do so by law. In particular, the following may be data recipients:

- a) people operating our infrastructure or IT systems,
- b) people providing data hosting.

VI. How long will we process your data??

For the time necessary to perform the agreement to provide access to the Website or for the duration of our legitimate interest in data processing – but in each case not shorter than for the period of your visit to the Website. Remember that if the basis for data processing is a legitimate interest – you have the right to object to further data processing, in accordance with point 8 below.

4.2 Contact form / order

I. What data we collect?

Data necessary to make contact via the Website and order by e-mail, including: name and surname, address, shipping address (if different), e-mail address, telephone number.

II. For what purpose we process data?

In order to:

- a) in order to take steps to conclude a contract, including responding to a contact request submitted via the contact form,
- b) execution of the placed order, including: sending related e-mails, sending the goods to the indicated address and handling any complaints,
- c) correspondence with the use of e-mail addresses,
- d) creating summaries, analyses and statistics – which includes in particular marketing research, analysis of commercial data, planning the development of services, etc.,
- e) pursuing claims or defending against claims.

III. Do you have to provide us with your data?

Providing data is voluntary, with the proviso that it is a condition for the possibility of using the related functionalities of the Website and the processing of contact data and then ordering by e-mail.

IV. On what legal basis do we process your data?

Based on the:

- a) concluded contracts, the subject of which is the production of self-adhesive labels, as well as the provision of ordered services (Article 6(1)(b) of the GDPR),
- b) generally applicable regulations that impose legal obligations on us, for the implementation of which it is necessary to process data - in particular in the field of tax law and accounting or archiving regulations (Article 6(1)(c) of the GDPR),
- c) our legitimate interest (Article 6(1)(f) of the GDPR) – consisting in the possibility of taking actions indicated in point II(c)-(e) above.

V. Who we may share your data with?

Personal data may only be disclosed to third parties if we are obliged or entitled to do so by law. In particular, data recipients may be:

- a) people who provide data hosting, support our infrastructure or IT systems,
- b) subcontractors through whom we can fulfil orders.
- c) persons providing services related to the execution or improvement of the sales process (e.g. couriers or carriers, payment intermediaries),
- d) persons providing audit or advisory services to us – e.g. in the field of legal, tax or accounting assistance.

VI. How long will we process your data?

Depending on the basis of the processing, it will be:

- a) the time necessary to perform the concluded contract, to take steps to conclude the agreement and to limit the related claims,
- b) duration of legal obligations that require the processing of your data,
- c) duration of our legitimate interest in data processing.

Remember that if the basis for data processing is a legitimate interest – you have the right to object to further data processing, in accordance with point 8 below.

4.3. Cookies

The Cookie Policy constitutes Appendix 1 to this Privacy Policy.

Can data be processed in processes involving automated decision-making, including "qualified" profiling?

At present, we do not have any operations in place that would involve automated decision-making that would produce legal effects on the part of their addressees or similarly significantly affect them. If such operations related to the processing of personal data are implemented in the future, we will ensure that they comply with the relevant laws.

5. Can your personal data be transferred outside the European Economic Area (EEA)?

At this time, we do not anticipate the transfer of your data outside the European Economic Area. However, we do not rule out that we may consider it justified in the future. In such a case, the data will be secured in the manner required by generally applicable regulations, in particular through the use of the so-called standard contractual clauses (SCC).

6. What rights do you have in relation to data processing?

In particular, you may apply to us for a:

- 1) access to the data processed by us (including: information about the processing of data by us or providing a copy of the data),
- 2) rectification (correction) of data,
- 3) restriction of processing (suspension of data operations or non-deletion of data),
- 4) erasure of data ("right to be forgotten"),
- 5) transfer of data to another controller.

The above requests may be sent, in particular, in the manner specified in section 11 below – and will be considered in accordance with the relevant regulations, including Articles 15-20 of the GDPR.

7. Right to object

Notwithstanding the above, you have the right to object to the processing of your data, which is carried out on the basis of our legitimate interest. In such a case, the:

- 1) if personal data is processed for marketing purposes – we will immediately cease such processing.
- 2) if the basis for the processing is another type of interest – we will cease such processing unless we demonstrate: a) that such interest overrides your interests, rights and freedoms, or b) there is a basis for establishing, exercising or defending against claims.

The right to object may be exercised, in particular, by sending an appropriate statement in the manner specified in point 11 below.

8. Complaint to the supervisory authority

If you believe that the processing of your data violates the applicable regulations, you have the right to lodge a complaint with the supervisory authority, i.e. the President of the Office for Personal Data Protection. The contact details of the Personal Data Protection Office are available in particular on the website of <https://uodo.gov.pl/pl/p/kontakt>.

9. Place of publication and updates to the privacy policy

This privacy policy may be amended from time to time. The current version of the policy will be available at all times on our website at: inicla.com.

10. How to Contact Us?

If you have any questions about how we use your personal data, you can contact us by phone, email or post at the following numbers and addresses:

Beata Wontor
running a business under the name INICLA Beata Wontor
ul. 2 43-316 Bielsko-Biała - with a note: "personal data protection"
tel.+48 880 217 227 e-mail: info@inicla.com

Appendix no. 1 to the Privacy Policy – COOKIES Policy

§1

1. This Policy sets out the rules for storing information by the Administrator and the Administrator's access to information already stored on the Client's Devices in the form of Cookies.
2. All terms defined in the Privacy Policy shall also have the meaning of this Cookie Policy. In addition, the following terms are given the following meanings:
 - a) **Cookies** -constitute IT data, in particular text files, which are stored on the Website User's end device and are intended for the use of the Website's websites. Cookies usually contain the name of the website from which they originate, the time they are stored on the end device and a unique number.
 - b) **First-party cookies** - means Cookies placed by the Administrator, related to the provision of electronic services by the Administrator through the Website.
 - c) **Privacy Policy** – of this Cookies Policy, constituting Appendix No. 1 to the Privacy Policy.
 - d) **Device** - means an electronic device through which the Customer accesses the Service.

§2

1. By means of Cookies, the Administrator stores information on the Client's Device or obtains access to information already stored – on the terms set out in this Policy.
2. The Administrator uses the following types of Cookies:
 - a) Session cookies: are temporary files that are stored on the User's end device until logging out, leaving the website or turning off the software (web browser),
 - b) Persistent cookies: they are stored on the User's end device for the time specified in the cookie parameters or until they are deleted by the User. Ending the session of a given browser or turning off the Device does not remove such Cookies from the Device.
3. The use of Cookies by the Administrator does not cause configuration changes in the Client's Device and the software installed on this Device.

§3

1. The Administrator uses its own Cookies in order to adapt the content of the Website to the preferences and needs of the User, in particular taking into account the type of Device used by the User to access the Website. These types of Cookies include:
 - a) „"necessary" cookies, enabling the use of services available on the Website, e.g. authentication cookies used for services that require authentication within the Website;
 - b) cookies used to ensure security, e.g. used to detect fraud in the field of authentication within the Website;
2. In connection with the use of cookies, the Administrator collects only statistical data related to the browsing history. Other data (e.g. name, address, etc.) is not stored in any way.

§4

1. The Client has the option of restricting or disabling the access of Cookies to their Device in the settings of the web browser or by configuring the service - in particular in such a way as to block the automatic handling of Cookies or to inform about each time Cookies are placed on the Client's Device. A description of the necessary steps for this purpose can be found on the manufacturers' websites, e.g:
 - a) Mozilla Firefox: <https://support.mozilla.org/pl/kb/W%C5%82%C4%85czenie%20i%20wy%C5%82%C4%85czenie%20obs%C5%82uqi%20ciasteczek>
 - b) Google Chrome: <https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=pl>
 - c) Microsoft Edge: <https://privacy.microsoft.com/pl-pl/windows-10-microsoft-edge-and-privacy>
2. The User may delete Cookies at any time.
3. The Administrator informs that restrictions on the use of cookies may affect some of the functionalities available on the Website.