

## PRIVACY POLICY OF THE ONLINE STORE Doggyyoga.pl

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#### GENERAL PROVISIONS

1.1. This Privacy Policy of the Online Store serves as informational and does not impose any obligations on Service Recipients or Customers of the Online Store. The Privacy Policy primarily contains rules regarding the processing of personal data by the Administrator in the Online Store, including the legal basis, purposes, and scope of personal data processing, as well as the rights of individuals whose data is processed. It also provides information about the use of cookies and analytical tools in the Online Store.

1.2. The Administrator of personal data collected through the Online Store is BENJAMIN KOZIOŁEK conducting business under the name BENJAMIN KOZIOŁEK B.K. GAMES & FUN, registered in the Central Register and Information on Economic Activity of the Republic of Poland, with the following address of the place of business: ul. Św. Agnieszki 9, 30-071 Kraków, address for correspondence: ul. Grzegórzecka 73A/10 31-339 Kraków, Tax Identification Number (NIP): 6751681498, National Business Registry Number (REGON): 381981103, email address: doggyyogakrakow@gmail.com, hereinafter referred to as the "Administrator," who is also the Service Provider of the Online Store and the Seller.

1.3. Personal data in the Online Store is processed by the Administrator in accordance with applicable laws, in particular, 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 (General Data Protection Regulation), hereinafter referred to as the "GDPR" or "GDPR Regulation." Official text of the GDPR: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0679>

1.4. Using the Online Store, including making purchases, is voluntary. Similarly, providing personal data by the Service Recipient or Customer using the Online Store is voluntary, with two exceptions: (1) entering into contracts with the Administrator - failure to provide personal data in cases and to the extent indicated on the Online Store's website, as well as in the Online Store's Terms and Conditions and this privacy policy, necessary for the conclusion and performance of the Sales Agreement or agreement for the provision of Electronic Services with the Administrator, will result in

the inability to conclude such an agreement. Providing the necessary data is a contractual requirement. The provision of personal data in such cases is a contractual requirement, and if a person whose data is processed wishes to enter into a specific contract with the Administrator, they are obliged to provide the required data. The scope of data required to conclude a contract is always indicated on the Online Store's website and in the Online Store's Terms and Conditions. (2) Legal obligations of the Administrator - providing personal data is a statutory requirement resulting from applicable laws that impose an obligation on the Administrator to process personal data (e.g., processing data for tax or accounting purposes), and failure to provide such data will prevent the Administrator from fulfilling these obligations.

1.5. The Administrator takes special care to protect the interests of individuals whose personal data is processed. In particular, the Administrator ensures that the collected data is: (1) processed lawfully, (2) collected for specified, lawful purposes and not further processed in a manner incompatible with those purposes, (3) accurate and adequate for the purposes for which they are processed, (4) stored in a form that allows for the identification of individuals for no longer than necessary to achieve the purpose of processing, and (5) processed in a manner that ensures appropriate security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction, or damage, using appropriate technical or organizational measures.

1.6. Taking into account the nature, scope, context, and purposes of processing, as well as the risks of varying likelihood and severity for the rights and freedoms of individuals, the Administrator implements appropriate technical and organizational measures to ensure that processing is carried out in accordance with applicable regulations and to be able to demonstrate compliance. These measures are subject to periodic review and updating when necessary. The Administrator employs technical measures to prevent unauthorized acquisition and alteration of personal data transmitted electronically.

1.7. All capitalized terms used in this privacy policy (e.g., Seller, Online Store, Electronic Service) should be understood as defined in the Online Store's Terms and Conditions available on the Online Store's website.

## BASIS FOR DATA PROCESSING

2.1. The Administrator is authorized to process personal data in cases where at least one of the following conditions is met, to the extent necessary: (1) the data subject has given consent to the processing of their personal data for one or more specific purposes; (2) processing is necessary for the performance of a contract to which the data subject is a party or for taking steps at the request of the data subject prior to entering into a contract; (3) processing is necessary for compliance with a legal obligation to which the Administrator is subject; or (4) processing is necessary for the purposes of the legitimate interests pursued by the Administrator or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, requiring the protection of personal data, in particular when the data subject is a child.

2.2. The processing of personal data by the Administrator requires the existence of at least one of the legal bases mentioned in section 2.1 of the privacy policy. The specific legal bases for the processing of personal data of Service Recipients and Customers of the Online Store are as follows

#### PURPOSE, LEGAL BASIS, AND RETENTION PERIOD OF PROCESSING PERSONAL DATA IN THE ONLINE STORE

3.1. The purpose, legal basis, retention period, and recipients of personal data processed by the Administrator result from actions taken by the respective Service Recipient or Customer in the Online Store or by the Administrator.

3.2. The Administrator may process personal data within the Online Store for the following purposes, based on the legal bases and for the specified periods indicated in the table below:

Purpose of data processing	Legal basis for data processing	Retention period
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Execution of a Sales Agreement or an agreement for the provision of Electronic Services or taking actions at the request of the data subject prior to the conclusion of the aforementioned agreements	Article 6(1)(b) of the GDPR (performance of a contract) – processing is necessary for the performance of a contract to which the data subject is a party or for taking pre-contractual steps at the request of the data subject	Data is stored for a period necessary for the performance, termination, or expiration of the concluded Sales Agreement or agreement for the provision of Electronic Services.
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Direct marketing	Article 6(1)(f) of the GDPR (legitimate interests pursued by the controller) – processing is necessary for purposes arising from the legitimate interests pursued by the Administrator, including protecting the interests and good reputation of the Administrator, their Online Store, and aiming to sell Products	Data is stored for the period of the existence of the legitimate interest pursued by the Administrator, but not longer than the limitation period for claims that may be raised by the Administrator against the data subject based on their business activity. The limitation period is determined by the provisions of the law, in particular the Civil Code (the basic limitation period for claims related to business activity is three years, and for a Sales Agreement, it is two years).
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The Administrator cannot process data for direct marketing purposes if an effective objection in this regard has been expressed by the data subject.

Marketing	Article 6(1)(a) of the GDPR (consent) – the data subject has given consent to the processing of their personal data for marketing purposes by the Administrator	Data is stored until the data subject withdraws their consent for further processing of their data for this purpose.
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Expressing an opinion by the Customer on the concluded Sales Agreement	Article 6(1)(a) of the GDPR – the data subject has given consent to the processing of their personal data for the purpose of expressing an opinion	Data is stored until the data subject withdraws their consent for further processing of their data for this purpose.
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Keeping tax or accounting records	Article 6(1)(c) of the GDPR in conjunction with Article 86(1) of the Tax Ordinance dated January 17, 2017 (Journal of Laws of 2017, item 201) or Article 74(2) of the Accounting Act dated January 30, 2018 (Journal of Laws of 2018, item 395) – processing is necessary for compliance with a legal obligation to which the Administrator is subject	Data is stored for the period required by the provisions of law imposing the obligation on the Administrator to keep tax records (until the expiration of the period of limitation of the tax liability, unless tax laws provide
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otherwise) or accounting records (5 years, counting from the beginning of the year following the financial year to which the data relates).

Establishing, investigating, or defending claims that may be raised by the Administrator or that may be raised against the Administrator Article 6(1)(f) of the GDPR (legitimate interests pursued by the controller) – processing is necessary for purposes arising from the legitimate interests pursued by the Administrator, including establishing, investigating, or defending claims that may be raised by the Administrator.

#### RECIPIENTS OF DATA IN THE ONLINE STORE

4.1. For the proper functioning of the Online Store, including the execution of concluded Sales Agreements, the Administrator needs to use the services of external entities (such as software providers, couriers, or payment service providers). The Administrator only uses the services of such processing entities that provide sufficient guarantees for the implementation of appropriate technical and organizational measures to ensure that the processing meets the requirements of the GDPR and protects the rights of the individuals whose data is involved.

4.2. The transfer of data by the Administrator does not occur in every case and not to all recipients or categories of recipients indicated in the privacy policy. The Administrator transfers data only when necessary to achieve the specific purpose of personal data processing and only to the extent necessary for its fulfillment. For example, if a Customer chooses personal pickup, their data will not be transferred to the carrier cooperating with the Administrator.

4.3. Personal data of Service Recipients and Customers of the Online Store may be transferred to the following recipients or categories of recipients:

- Carriers/freight forwarders/courier brokers/entities handling warehouse and/or shipping processes - in the case of a Customer who chooses postal or courier delivery of the Product in the Online Store, the Administrator provides the collected personal data of the Customer to the selected carrier, freight forwarder, or intermediary responsible for the delivery on behalf of the Administrator, and if the shipment originates from an external warehouse - to the entity handling the warehouse and/or shipping process - to the extent necessary for the delivery of the Product to the Customer.
- Entities handling electronic or card payments - in the case of a Customer who uses electronic or card payments in the Online Store, the Administrator provides the collected personal data of the Customer to the selected entity handling the aforementioned payments in the Online Store on behalf of the Administrator, to the extent necessary for the processing of the payment made by the Customer.
- Service providers supplying the Administrator with technical, IT, and organizational solutions enabling the Administrator to conduct business activities, including the Online Store and the Electronic Services provided through it (in particular, providers of software for operating the Online Store, email and hosting providers, as well as providers of business management software and technical support to the Administrator) - the Administrator provides the collected personal data of the Customer to the selected supplier operating on its behalf only in the case and to the extent necessary to achieve the specific purpose of data processing in accordance with this privacy policy.
- Accounting, legal, and advisory service providers providing accounting, legal, or advisory support to the Administrator (in particular, accounting offices, law firms, or debt collection agencies) - the Administrator provides the collected personal data of the Customer to the selected provider acting on

its behalf only in the case and to the extent necessary to achieve the specific purpose of data processing in accordance with this privacy policy.

- Facebook Ireland Ltd. - The Administrator uses social plugins from the Facebook service on the Online Store website (e.g., "Like," "Share," or login using Facebook login credentials), and therefore collects and provides the personal data of the Service Recipient using the Online Store website to Facebook Ireland Ltd. (4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland) to the extent and in accordance with the privacy principles available here:

<https://www.facebook.com/about/privacy/> (this data includes information about actions on the Online Store website, including information about the device, visited websites, purchases, displayed advertisements, and usage of services - regardless of whether the Service Recipient has a Facebook account or is logged into Facebook).

## PROFILING IN THE ONLINE STORE

5.1. The GDPR Regulation imposes on the Data Controller the obligation to inform about automated decision-making, including profiling, as referred to in Article 22(1) and (4) of the GDPR, and - at least in such cases - provide essential information about the rules for making such decisions, as well as the significance and anticipated consequences of such processing for the individual whose data is involved. With this in mind, the Data Controller provides information regarding possible profiling in this section of the privacy policy.

5.2. The Data Controller may use profiling for direct marketing purposes in the Online Store, but the decisions made based on profiling by the Data Controller do not concern the conclusion or refusal to conclude a Sales Agreement or the possibility of using Electronic Services in the Online Store. The result of profiling in the Online Store may include, for example, granting a discount to a specific individual, sending them a discount code, reminding them of unfinished purchases, sending proposals for Products that may correspond to the interests or preferences of the individual, or offering better conditions compared to the standard offer of the Online Store. Despite profiling, the individual is free to decide whether they want to take advantage of the received discount or better conditions and make a purchase in the Online Store.

5.3. Profiling in the Online Store involves the automatic analysis or prediction of the behavior of a specific individual on the website of the Online Store, for example, by adding a specific Product to the cart, browsing a specific Product page in the Online Store, or analyzing the individual's previous purchase history in the Online Store. The condition for such profiling is that the Data Controller possesses the personal data of the individual in order to subsequently send them, for example, a discount code.

5.4. The individual whose data is involved has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

## RIGHTS OF THE INDIVIDUAL WHOSE DATA IS INVOLVED

6.1. Right of access, rectification, restriction, erasure, and data portability - the individual whose data is involved has the right to request from the Data Controller access to their personal data, rectification of the data, erasure ("right to be forgotten") or restriction of processing, and has the right to object to the processing, as well as the right to data portability. The detailed conditions for exercising the aforementioned rights are set out in Articles 15-21 of the GDPR.

6.2. Right to withdraw consent at any time - the individual whose data is processed by the Data Controller based on their consent (based on Article 6(1)(a) or Article 9(2)(a) of the GDPR) has the right to withdraw consent at any time without affecting the lawfulness of the processing carried out based on the consent before its withdrawal.

6.3. Right to lodge a complaint with a supervisory authority - the individual whose data is processed by the Data Controller has the right to lodge a complaint with a supervisory authority in the manner and procedure specified in the provisions of the GDPR and Polish law, in particular the Personal Data Protection Act. The supervisory authority in Poland is the President of the Personal Data Protection Office.

6.4. Right to object - the individual whose data is involved has the right to object, on grounds relating to their particular situation, at any time to the processing of their personal data based on Article 6(1)(e) (public interest or official authority) or (f) (legitimate interests pursued by the Data Controller), including profiling based on these provisions. In such a case, the Data Controller may no longer process the personal data, unless they demonstrate compelling legitimate.

6.5. Right to object to direct marketing - if personal data is processed for the purposes of direct marketing, the individual whose data is involved has the right to object at any time to the processing of their personal data for such marketing, including profiling, to the extent that it is related to such direct marketing.

6.6. In order to exercise the rights mentioned in this privacy policy, individuals can contact the Data Controller by sending a relevant message in writing or by email to the address provided by the Data Controller at the beginning of the privacy policy or by using the contact form available on the Online Store's website.

#### COOKIES IN THE ONLINE STORE ANALYTICS

7.1. Cookies are small text information files in the form of text files sent by the server and stored on the side of the person visiting the Online Store website (e.g., on the hard drive of a computer, laptop, or on the memory card of a smartphone - depending on the device used by the visitor of our Online Store). Detailed information about cookies and their history can be found, among others, here: [http://en.wikipedia.org/wiki/HTTP\\_cookie](http://en.wikipedia.org/wiki/HTTP_cookie).

7.2. The Administrator may process data contained in cookies when visitors use the Online Store website for the following purposes:

- Identifying users as logged into the Online Store and indicating that they are logged in;
- Remembering Products added to the cart to place an Order;
- Remembering data filled in Order Forms, surveys, or login data for the Online Store;
- Customizing the content of the Online Store website to individual preferences of the user (e.g., regarding colors, font size, page layout) and optimizing the use of the Online Store website;
- Conducting anonymous statistics showing how the Online Store website is used;
- Remarketing, which involves studying the behavioral characteristics of visitors to the Online Store through anonymous analysis of their actions (e.g., repeated visits to specific pages, keywords, etc.) to create their profile and deliver them advertisements tailored to their predicted interests, even when they visit other websites in the advertising network of Google Ireland Ltd. and Facebook Ireland Ltd.

7.3. By default, most web browsers available on the market accept the storage of cookies. Everyone has the ability to determine the conditions for using cookies using the settings of their own web browser. This means that it is possible to partially limit (e.g., temporarily) or completely disable the ability to store cookies - in the latter case, however, this may affect some functionalities of the Online Store (for example, it may be impossible to proceed through the Order path using the Order Form due to not remembering Products in the cart during subsequent steps of placing the Order).

7.4. The settings of the web browser regarding cookies are important from the point of view of the consent to the use of cookies by our Online Store - in accordance with the regulations, such consent can also be expressed through the settings of the web browser. In the absence of such consent, it is necessary to appropriately change the settings of the web browser regarding cookies.

7.5. Detailed information on changing the settings regarding cookies and their independent removal in the most popular web browsers is available in the help section of the web browser and on the following pages (just click on the respective link):

- In Chrome browser
- In Firefox browser
- In Internet Explorer browser
- In Opera browser
- In Safari browser
- In Microsoft Edge browser

7.6. The Administrator may use Google Analytics, Universal Analytics services provided by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland) in the Online Store. These services help the Administrator gather statistics and analyze traffic in the Online Store. The collected data is processed within the framework of the aforementioned services to generate statistics that are helpful in managing the Online Store and analyzing traffic in the Online Store. This data is of an aggregated nature. By using the aforementioned services in the Online Store, the Administrator collects data such as the sources and medium of acquiring visitors to the Online Store, as well as their behavior on the Online Store website, information about devices and browsers they use to visit the website, IP and domain, geographic data, demographic data (age, gender), and interests.

7.7. It is possible for an individual to easily block the sharing of their activity information on the Online Store website with Google Analytics - for this purpose, for example, they can install a browser add-on provided by Google Ireland Ltd., available here:

<https://tools.google.com/dlpage/gaoptout?hl=en>.

7.8. The Administrator may use the Facebook Pixel service provided by Facebook Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) in the Online Store. This service helps the Administrator measure the effectiveness of advertisements, learn about the actions taken by visitors to the Online Store, and display personalized ads to them. Detailed information about the operation of the Facebook Pixel can be found at the following website:

[https://www.facebook.com/business/help/742478679120153?helpref=page\\_content](https://www.facebook.com/business/help/742478679120153?helpref=page_content).

7.9. Managing the operation of the Facebook Pixel is possible through the ad settings in one's account on Facebook.com: [https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen).

## FINAL PROVISIONS

The Online Store may contain links to other websites. The Administrator encourages individuals to review the privacy policy established on those other websites. This privacy policy applies only to the Administrator's Online Store.