

PRIVACY POLICY
MPPK GROUP SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ

www.countryofanimals.com

**PERSONAL DATA CONTROLLER'S NOTICE DRAWN UP PURSUANT TO ARTICLE 13(1) AND (2)
OF THE GENERAL DATA PROTECTION REGULATION (GDPR)**

In connection with the entry into force 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 (General Data Protection Regulation) and the obligation to apply it, the owner of the internet domain would like to inform you how your personal data are processed.

I. GENERAL INFORMATION

1. The controller of your personal data is MPPK GROUP Spółka z ograniczoną odpowiedzialnością with its registered office in Szymanów, ul. Północna 1 bud. 2, 51-180 Szymanów (Poland), entered into the Register of Entrepreneurs of the National Court Register of the District Court for Wrocław-Fabryczna in Wrocław, 9th Commercial Division of the National Court Register under number: 0000971556, Tax Identification Number NIP: 8943049521 and Statistical Number REGON: 022284428 – hereinafter referred to as the “Controller”.
2. In matters related to the processing and protection of personal data, you can contact the Controller:
 - a. by email: administracja@alphaspirit.pl
 - b. by phone: +48 535 045 130
 - c. at the following correspondence address: MPPK GROUP Spółka z ograniczoną odpowiedzialnością, ul. Północna 1 bud. 2, 51-180 Szymanów (Poland).
3. This document reflects the requirements 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 (General Data Protection Regulation) – hereinafter “GDPR”.
4. By using the www.countryofanimals.com website as a Website User, including by using the Contact Form and registering for our Newsletter, you provide us with your personal data. The document that you are reading now contains information about how we process your personal data and what rights you have as a data subject.

II. PURPOSE OF AND BASIS FOR THE PROCESSING OF PERSONAL DATA

1. The personal data you provide us with by using the Website, including in particular your name and email address, are processed:
 - a. to the extent necessary to establish, change, terminate and properly perform the services provided by the Controller electronically, including the Newsletter and Contact Form services,
 - b. to process complaints you submit,
 - c. to pursue any claims arising in connection with the performance of the services provided electronically,
 - d. to handle other requests, queries or complaints you send us.
2. Provision of personal data is voluntary, but if they are not provided, we may not be able to provide services to you electronically, e.g. you may not be able to receive the Newsletter or use the Contact Form.
3. Your personal data are processed, to the extent necessary to perform the services provided electronically and handle your requests, on the basis of Article 6(1)(b) of the

GDPR – the processing is necessary for the performance of agreements you conclude with the Controller via the Website, e.g. as part of the Contact Form service.

4. By registering for our Newsletter, you provide us with your personal data on the basis of consent pursuant to Article 6(1)(a) of the GDPR. You can withdraw your consent at any time and unsubscribe from our Newsletter by clicking a link contained in every newsletter email. The withdrawal of consent will not affect the lawfulness of data processing before its withdrawal.
5. We also process the personal data you provide us with in order to comply with our legal obligations. In addition, we can also process your data in order to comply with the obligation to apply the accountability principle, which requires that the Controller demonstrate compliance with the provisions on the protection of personal data. In this case, the legal basis for the necessary data processing is the legal obligation imposed on us under Article 6(1)(c) of the GDPR.
6. We will also process the data you provide us with via the services offered on the Website on the basis of the legitimate interest of the Controller (Article 6(1)(f) of the GDPR). We will process the following data:
 - a. necessary for us to pursue claims and defend ourselves against such claims,
 - b. provided in questions, complaints or suggestions in order to respond to your questions, complaints or suggestions,
 - c. indicated in questionnaires that we may ask you to complete to measure our customers' satisfaction and the quality of our services,
 - d. necessary to conduct statistical surveys and analyses and to improve the services we offer,
 - e. necessary to ensure the security of the services we provide electronically, including to prevent potential abuse or fraud,
 - f. necessary to contact you for purposes related to permitted marketing activities, in particular with your consent,
 - g. data to be archived.

III. PROFILING

The Controller does not create User Profiles using personal data provided by Users via the Website to provide Users with information about products, new products and promotions, send special offers or carry out direct marketing (profiling).

IV. PERSONAL DATA SECURITY

The Controller has implemented procedures ensuring that only authorised persons have access to personal data and only to the extent necessary for the performance of their tasks. The Controller applies organisational and technical solutions to ensure that all operations on personal data are recorded and performed only by authorised persons.

V. PERSONAL DATA RECIPIENTS

1. We will share your data with our employees and associates who need to access Users' data to perform the Controller's obligations or user-related operations on behalf of the Controller, and with our contractors, i.e. service providers and IT providers, advertising agencies, administrative service providers, public authorities, including courts, at their reasonable request, insurers and Controller's advisers, where this is necessary to defend the Controller against claims or to pursue Controller's claims.
2. Your personal data will not be shared with other third parties, in particular will not be transferred to other entities for the purpose of sending third-party marketing materials.
3. We will not transfer your personal data to third countries (i.e. outside the European Economic Area).

VI. AUTOMATED DECISION-MAKING

We use automated decision-making to ensure that our offer is optimally tailored to your needs. The Controller may decide which ads to display to you and which information about products and services, and promotions and discounts to send to you, based solely on automated data processing. As a result of these decisions, you may receive offers and information about products, services and discounts tailored to your individual needs. Automated decision-making will not have any legal effect on you or otherwise significantly affect you.

VII. YOUR RIGHTS

1. In connection with the processing of your personal data by the Controller, you have the following rights:
 - a. the right to access your personal data, including the right to obtain information about them and obtain their copy,
 - b. the right to request rectification or completion of your personal data if they are inaccurate and the right to complete incomplete data,
 - c. the right to request restriction of the processing of your personal data,
 - d. the right to request erasure of your personal data,
 - e. the right to withdraw your consent to the processing of personal data: to the extent that your data will be processed on the basis of your consent, you have the right to withdraw it at any time, without affecting the lawfulness of the processing we carried out on the basis of consent before its withdrawal,
 - f. the right to withdraw your consent to receive marketing communication,
 - g. the right to lodge a complaint with the personal data protection authority (President of the Personal Data Protection Office – ul. Stawki 2, 00-193 Warsaw (Poland)) if you consider that the processing of your personal data infringes the GDPR,
 - h. the right to transfer the data,
 - i. the right to object to the processing of personal data if they are processed for statistical purposes or on the basis of the Controller's legitimate interest and the objection is justified by your particular situation.

VIII. DURATION OF THE PROCESSING OF PERSONAL DATA

1. We will process your personal data to enable you to use the Website until the limitation period for claims has expired if the processing of these data is necessary for the establishment or pursuit of claims and for defence against such claims.
2. To the extent that we process your personal data as part of the services provided electronically, we will process them until you stop using our services, including the Newsletter. This period will be extended by the limitation period for claims if the processing of these data is necessary for the pursuit of such claims and for defence against them.
3. To the extent that your personal data are processed for compliance with our obligations under applicable laws, we will process them for a period resulting from such laws.
4. To the extent that your personal data are processed for the purpose of pursuing our legitimate interests, including providing you with marketing information and marketing communications, we will process them for the duration of the legitimate interest, unless you exercise your right to object to the processing of these data for marketing purposes.
5. To the extent that your personal data are processed for the purpose of pursuing our legitimate interests, i.e. establishing and pursuing claims or defending ourselves against claims and responding to your questions, complaints or suggestions, we will process them for the duration of our legitimate interest.

IX. COOKIES AND OTHER TECHNOLOGIES POLICY

COOKIES

1. "Cookies" is a collective term for text files saved in a dedicated area of the hard drive of the User's end device (computer, tablet, smartphone, etc.) from a data carrier used (internet, mobile application) when online content or other materials are browsed. These files make it possible to identify the device on which they are stored, track the activity of the user of the data carrier and obtain information about the User's preferences or information provided by the User through the Website's functionalities.
2. Cookies do not identify the User. Instead, they are used to identify the browser or device (by being "remembered"). The information that remains displayed on the data carrier used remains directly identified and linked to an anonymous identifier assigned to it in cookies and other technologies used in this regard for a specified period of time (the time after which a cookie is removed), which makes it possible to learn the User's preferences and adjust the website functionalities regardless of the device or end carrier used.
3. Some files are necessary to use the carrier; others optimise and adjust the content presented; still others show ads. Cookies and other similar technologies make it possible to collect statistical data about the Website and thus improve it according to Users' preferences.
4. The type and number of files processed may vary depending on the website or device used. Cookies may collect such information as IP address, device ID, websites viewed, browser type, information viewed, operating system used, internet provider, time stamps, advertising response, referring URLs, website functions used or website activity.
5. Cookies are not harmful to the end device in any way and do not change its settings or the settings of the software installed on it. These files can be read only by the server that created them. Cookies usually contain the name of the website they come from, their storage time on the end device and a unique number.
6. For more information about what cookies are, go to www.aboutcookies.org (English) and <http://wszystkoociasteczkach.pl> (in Polish).

PURPOSE OF COOKIES

1. As part of the Website, the Controller uses cookies to:
 - o run the Website,
 - o ensure the security of the Website and prevent its abuse (including by unauthorised persons),
 - o make it possible to remember Users' settings and preferences and optimise the use of the Website,
 - o prevent web crawlers from taking certain actions on the Website,
 - o make it possible to improve how the Website works,
 - o make it possible to receive personalised advertising (cookies can be used by the Website or by advertising service providers cooperating with the Controller to ensure that ads tailored to Users' interests are displayed).

TYPES OF COOKIES USED ON THE WEBSITE

1. **Session cookies** – information stored in a browser's memory until the end of a browser session, i.e. until the user closes the browser, logs out, leaves a website or shuts down software (web browser). These cookies are necessary for the Website's functionalities to work.
2. **Persistent cookies** – cookies facilitating the use of the Website, used for various purposes, including remembering Users' preferences and choices made when using the website. These cookies remain in a browser's memory for a longer period, specified in file parameters, or until they are manually removed. Persistent cookies do not collect or download any personal data or confidential information from the user's device.
3. **First-party cookies** – cookies sent to the user's device from a device or domain managed by the Controller.

4. **Third-party cookies** – cookies sent to the user's device from a device or domain not managed by the Controller, but by another entity that processes the data obtained through cookies, including social plugins (data are sent to social networking sites).

If cookies are installed from a device or domain managed by the Controller, but the information collected through them is managed by a third party, they cannot be regarded as first-party cookies.

CATEGORIES OF COOKIES AND OTHER TECHNOLOGIES USED

1. **NECESSARY / TECHNICAL COOKIES** – cookies necessary to provide an optimised browsing experience on the Website (e.g. session ID). In particular, they ensure the security of the services provided electronically, access to the website and the use of all available functionalities of the Website. They can also recognise visitors to the website and improve its functionality through:
 - the storing of information provided through forms available on the website etc.,
 - the implementation of measures to protect the transmitted content, recorded via the website, including in particular personal data

In addition, the necessary cookies used take into account the processing of the following categories of personal data:

- user inputs, the option to remember user input data from several subpages at the same time,
- credentials in respect of identified incidents (e.g. when multiple failed login attempts are detected)

The duration of these cookies is short – one session.

If necessary cookies are used, consent for their use is not required. If you decide to disable them, however, it may no longer be possible to display the Website or use its services, e.g. record information provided through forms.

2. **FUNCTIONAL COOKIES** – cookies that help us run and design the Website and apply appropriate user preferences. They make it possible to recognise visitors to the website and improve its functionality by:
 - adjusting the appearance of the website to the User's selected preferences, e.g. language, colour or layout.

Depending on their function, personalisation cookies can last for the duration of a session, a few hours or one year.

The functional cookies used take into account the processing of the following categories of personal data:

- IP address – regularly anonymised, assigned to the user's data with the user's express consent.

The Customer's consent for the use of functional cookies is required. Lack of consent for these cookies does not affect the usability of the website.

3. **ANALYTICAL COOKIES** – cookies that make it possible to generate statistics on website traffic and traffic sources. They measure which content and individual sections of the website are viewed for the purpose of evaluating and organising the website, including obtaining statistics on visitors to the Website and its individual functionalities and adjusting the appearance of the website to users' preferences, depending on the

data carriers used. Analytical cookies also make it possible to detect abuse of the website, e.g. in the form of bots (artificial internet traffic).

The analytical cookies used take into account the processing of pseudonymised user profiles with information about the use of the website, in particular:

- the browser type/version used,
- the operating system used,
- referrer URL (previously visited website),
- the host name of the accessing computer (IP address) – regularly anonymised, assigned to the user's data with the user's express consent,
- individual user ID,
- events triggered on the website (browsing patterns).

These cookies have a lifespan of up to 13 months.

The Customer's consent for the use of analytical cookies is required. Lack of consent for these cookies does not affect the usability of the website.

- 4. MARKETING COOKIES** – cookies that make it possible to display ads, including those tailored to the user's interests according to the browsing history on a given device. They make it possible to select ads that are more interesting for users and also more valuable for publishers and advertisers. They may be used to display advertising content outside the Website, including integrating social media into the Website and applications.

The marketing cookies used take into account the processing of pseudonymised user profiles with information about the use of the Website, in particular:

- IP address – regularly anonymised, assigned to the user's data with the user's express consent,
- individual user ID,
- potential interest in products,
- events triggered on the website (browsing patterns).

Where appropriate, the user ID together with related profiles is shared with third parties through advertising network providers.

These cookies have a lifespan of up to 13 months.

The Customer's consent for the use of marketing cookies is required. Lack of consent for these cookies does not affect the usability of the website.

LEGAL BASIS FOR PROCESSING

The legal basis for using cookies and other technologies is:

- a. for recording preferences for statistical and marketing purposes (and similar techniques) – consent granted pursuant to Article 6(1)(a) of the GDPR.
- b. for (technically) necessary cookies (and similar techniques) – Article 6(1)(b) of the GDPR, as necessary for the performance of an agreement to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into an agreement,
- c. for (technically) necessary cookies (and similar techniques) – also Article 6(1)(f) of the GDPR to the extent that the Controller has a legitimate interest in the processing of personal data for the purpose of ensuring uninterrupted use of the Website.

PRIVACY NOTICE

Each User of the website grants their consent for the use of cookies (and other files) when they use the Website for the first time.

The use of the Website may involve the use of cookies to tailor the services offered to your individual needs and preferences, adjust the content of the website and optimise its use.

The place where settings for cookies (and technological files) are available as part of browser functionalities depends on which browser you use:

- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer?redirectlocale=en-US&redirectslug=Cookies>
- Internet Explorer: <https://support.microsoft.com/en-us/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>
- Safari: <https://support.apple.com/en-us/HT201265>
- Opera: <https://help.opera.com/pl/latest/web-preferences/#cookies>

The user can disable cookies in the web browser of their end device. However, to the extent specified above, this may cause difficulties or prevent the use of the Website.

Consent for the use of cookies and other technologies or refusal to accept them is limited to the website on which this notice is posted and does not apply to other websites that may be linked to it. Additional information about cookies used by other websites and other technologies can be found in the privacy or cookie notices posted on them.

X. FINAL PROVISIONS

This Privacy Policy is effective from 20 November 2023. We reserve the right to change the above Privacy Policy by publishing a new Privacy Policy via a designated website.

You will be notified of changes to these rules 14 days in advance.