

## **Privacy Policy**

## §1. General Provisions

- 1. The Data Controller is as follows: Omnipack Sp. z o.o. with the seat in Warsaw, Aleje Jerozolimskie 81, 02-001 Warsaw, entered into the Register of Entrepreneurs with the following National Court Register number: KRS 0000604889, the registration files are kept by the District Court for the Capital City of Warsaw, 14th Economic Division of the National Court Register, VAT ID: 5223055791, REGON: 363864156, equity capital in the amount of: PLN 65,050.00.
- 2. Data protection is carried out in accordance with the requirements of generally applicable law and it is stored on secured servers.
- 3. In order to better understand the Privacy Policy, the term "User" has been replaced with the term "You", and the term "Controller" has been replaced with the term "We". GDPR is 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.
- 4. We respect the right to privacy and ensure safety of data.
- 5. Personal data entered into the form on the website or landing page is treated as confidential and not visible to unauthorised people.

## §2. Data Controller

- 1. Omnipack is the Controller of its customer data. This means that when you specify your data on our website, we will process the following data: name, surname, e-mail address, phone and other data that we receive from you.
- 2. Omnipack is also the Controller of data of people who signed up to the newsletter and to the webinar (if the latter is organised).
- 3. Personal data is processed:
  - o In line with the regulations regarding personal data protection,
  - o In line with the implemented Privacy Policy,
  - To the extent and for the purpose necessary to establish and shape the contents of an Agreement and for its change or resolution as well as to ensure proper implementation of the Services provided electronically (Article 6 (1) (b) of the GDPR),

- o In the scope and purpose required to fulfil our justified business (legally-justified aims) and sharing the goals of our business activities.
- o If you have sent an enquiry through the form on our website, landing page or via the form on Facebook,
- o In order to provide an offer of products and services directly (direct marketing), including in particular in the scope compliant with your consent, if you signed up to a newsletter (respectively, Article 6 (1) (f) of the GDPR and Art. 6 sec. 1 lit. a GDPR)
- o in other cases, your data will be processed only on the basis of prior consent, to the extent and for the purpose expressed in its content (Article 6 (1) (a) of the GDPR)
- 4. Each person to whom the data relates (if we are the data Controller) has the right to the following:
  - accessing their data and receiving its copy;
  - clarifying (correcting) their data;
  - o deleting data if in their opinion there are no grounds for our processing of the data;
  - limiting data processing if in their opinion we possess incorrect data relating to them or process it without justification; or if such a person does not wish for the data to be removed as it is required for determining, investigating or defending claims; or for the time of an objection submitted by that person with regard to data processing;
  - object to processing of personal data for the purpose of direct marketing and the right to object to processing data on the basis of a legally justified business, for purposes other than direct marketing;
  - transferring data you have the right to receive your personal data in a structured, commonly used machine-readable format, that was submitted to us based on an agreement or consent; you can also request us to send such data to another entity directly;
  - submitting a complaint to a supervision authority if you feel that we are processing your data unlawfully, you can submit a complaint to the President of the Office of Personal Data Protection or another appropriate supervisory authority;
  - the right to revoke the consent for processing your personal data you have the right to revoke the consent for processing your personal data at any time, that we process on the basis of your consent; revoking the consent will not affect the legality of the processing, which was made on the basis of the consent before its revoking.
- 5. An inspector (Emilia Waszak) has been assigned at the Service Provider's headquarters that you can contact by writing to: <a href="mailto:rodo@omnipack.com">rodo@omnipack.com</a>
- 6. Your data will be processed no longer than it is necessary for completing the business goals for which it was collected.

- o in the event that personal data will be processed for the purposes of responses or the pricing of the services they will provide processed for the time necessary for its implementation and demonstration the correctness of its implementation, i.e. for the period of limitation of any possible claims
- o in the event that personal data will be processed in order to implement our legitimate interests referred to above for a period of up to the time of completing these interests or objecting to such processing
- o in the event that personal data will be processed on the basis of consent to the moment of withdrawal of such consent. To the extent that the data is processed on the basis of your separate consent, they have the right to withdraw consent at any time. However, this will not affect compliance with the right to process data before its withdrawal

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- 7. With all guarantees ensuring safety of the transmitted data, your personal data may be accessed by the following recipients:
  - our authorised employees/co-workers,
  - service providers supplying technical and organisational solutions to us (specifically entities providing ICT and marketing services, courier companies, providers of legal and advice services and their authorised employees/co-workers),
  - entities analysing data in order to personalise advertisement and being separate controllers in this scope, in particular Google LLC.
- 8. Omnipack also has the right to disclose your personal data and other data to entities authorised according to applicable laws (e.g. law enforcement agencies).
- 9. Your personal data may be provided to countries beyond the European Economic Area, if we undertake the appropriate measures to ensure that such transfer is in accordance with GDPR. Such measures may include, in particular, the transfer of personal data to the recipient in a country, which, pursuant to the European Commission's decision, ensures an adequate level of protection or based on the standard data protection clauses adopted by the European Commission.
- 10. Removing personal data may take place as a result of revoking a consent or submitting a legally-permitted objection for processing personal data.
- 11. We have implemented pseudonymisation and encryption of data. We have also implemented access control which enables us to minimize the effects of any possible violation of data safety.
- 12. Our service was not designed with children up to the age of 16 in mind. It is not addressed to children.

## §3. Cookies

 www.omnipack.com uses cookies, which can represent your personal data. Cookies are small text files sent by our web server and stored by a web browser. When the browser reconnects with the site, the site recognizes the type of device you use to connect. Parameters allow the information contained in the cookies to be read only by the server that created them. Therefore, cookies facilitate the use of websites that have been previously visited.

Information collected relates to the IP address, type of used web browser, language, type of operating system, supplier of internet services, information about time and date, location and other information sent to the website via the contact form.

2. The data collected is used for monitoring and checking in what way you browse our website, to improve service functioning ensuring more effective and problem-free navigation. Information about you is monitored via Google Analytics, which registers user behaviour on the website.

Cookies identify you, which enables us to adjust the website content to your needs. They enable us to adjust advertisements targeted at a user by remembering the user's preferences. We use cookie files to guarantee the highest standard of convenience of our website, while the data collected is used only internally by Omnipack in order to optimise activities.

We also use Google AdWords, where Google is a separate personal data controller. Data that we collect about you helps us in better target advertisements and promotions.

Within the website, also the following services are active: Facebook Ads and Facebook Business Tools (Facebook Pixel). Thanks to this technology, users who visited our website through an advertisement on another website of a Facebook partner, may see our advertisement again.

- 3. Our website uses the following cookie files:
  - required cookies that enable use of services available within the website, e.g. encrypting cookie files used for services requiring encryption on the website;
  - cookie files used for ensuring safety, e.g. used for detecting violations in the scope of encryption on the website;
  - o performance cookies enabling to collection information about the method of using particular pages of our website;
  - functional cookie files, enabling to remember settings you select as well as personalisation of your interface, e.g. in the scope of the selected language or region from which the user originates as well as the font size, website appearance, etc.;

- advertising cookie files enabling us to provide advertisement content to you that is more adjusted to your interests.
- 4. You can deactivate or restore the option of collecting cookies by changing the web browser settings. Instructions for managing cookie files are available at: <a href="http://www.allaboutcookies.org/manage-cookies">http://www.allaboutcookies.org/manage-cookies</a>.