

Sukces Technology Group  
- Dziemiańczuk sp.j.

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## Privacy Policy

### I. Privacy Policy of sukcesgroup.pl

1. Sukces Technology Group - Dziemiańczuk spółka jawna (hereinafter referred to as "sukcesgroup.pl") is the data controller within the meaning of the Regulation of the European Parliament and of the Council (EU) of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, repealing directive 95/46/EC (hereinafter referred to as the GDPR in an abbreviated form), in reference to personal data of Users who are natural persons. The above means that sukcesgroup.pl determines the purposes and manners of processing personal data of Users on its own and under own responsibility. In case of questions or doubts as to how personal data are protected by sukcesgroup.pl, please contact sukcesgroup.pl (in line with the instruction specified in part IX of this document).

2. Sukces Technology Group - Dziemiańczuk spółka jawna (hereinafter referred to as "sukcesgroup.pl") is the data controller within the meaning of the provisions of the Personal Data Protection Act of 10 May 2018 (Journal of Laws [Dz.U.] of 2018, No. item 1000 as amended);

3. When the term "processing" is mentioned in this document, it denotes all activities and operations performed on personal data (e.g. storage or analysis of personal data for the purpose of providing services to the Users).

4. The purpose of this Privacy Policy is to determine the tasks undertaken by sukcesgroup.pl within the scope of protection of processed personal data, including data collected via the website www.sukcesgroup.pl and mobile application, as well as services and tools related to them, used by the Users to perform activities such as Registration, posting or browsing and performance of a series of other activities related to the above, in relation to the use of the services of sukcesgroup.pl by the Users. All of the activities of sukcesgroup.pl are subject to legal provisions which are binding in the area of data protection, e.g. the General Data Protection Regulation. Our Privacy Policy is subject to the provisions of the Polish law and the General Data Protection Regulation.

5. Your use of www.sukcesgroup.pl, including downloading and receiving the newsletter, downloading the mobile application or using services and tools related to them is only possible after reading the provisions of this Privacy Policy of sukcesgroup.pl

6. By clicking the links posted on the sukcesgroup.pl website or the mobile application, you may be redirected to websites which constitute services offered by entities other than sukcesgroup.pl and thus remaining outside of any direct or indirect control on our part, where the process of data processing, including collection of personal data, takes place in line with the principles specified by such entities, e.g. in the privacy policy proper for such services or in the application, in particular in cases specified below.

## II. Data controller of personal data in sukcesgroup.pl

1. The data controller of personal data of sukcesgroup.pl (hereinafter referred to as the Data Controller), i.e. an entity responsible for ensuring safety for your personal data is:

*Sukces Technology Group - Dziemiańczuk spółka jawna with its registered office in Wasilków, address: ul. Produkcyjna 2, postal code: 16-010 Wasilków (VAT Reg. No. (NIP): 966-175-88-27, State Statistical No. (REGON): 052249561, National Court Register No. (KRS): 0000278502).*

2. Any data collected by sukcesgroup.pl are protected with the use of reasonable technical and organisational measures and safety procedures for the purpose of securing them from access of unauthorised parties or from unauthorised use.

3. Entities associated with sukcesgroup.pl, trusted partners and external service providers are liable for managing data in line with the security requirements and privacy protection requirements adopted by sukcesgroup.pl.

## III. Data processing principles

1. Provision of personal data, as well as approval for the processing of data is voluntary. Any personal data provided to sukcesgroup are processed exclusively within the scope and for the purpose for which you agreed. If you decide not to provide data that are necessary for the processing of your order and you do not agree for the processing of such data, we will unfortunately be unable to process your order.

2. Please remember that you have a right to update or completely remove your personal data at any time. You may do it independently, as well as use our help, which we will gladly offer.

3. We assure you that our company observes the restrictive personal data protection policy compliant with the GDPR.

4. Your personal data are safe with us and we exercise any efforts to make the level of protection higher every year. We believe that becoming acquainted with our privacy policy will allow you to feel safe and enjoy your shopping and use of the sukcesgroup.pl website.

5. If it complies with the User's approval or justified interest of sukcesgroup.pl, sukcesgroup.pl may make the Users' personal data available to other websites operated by sukcesgroup.pl. In such case, every User whose personal data were made available will be informed in detail about it.

6. Sukcesgroup.pl does not provide personal data of Users to third parties without the approval of interested Users, unless one of the following circumstances has taken place:

a) Sukcesgroup.pl may cooperate with third parties (e.g. specialist suppliers of data storage services or suppliers of analytical services) for the purpose of receiving services from such entities. In such case, such entities are not authorised to use personal data of Users on its own (data will always be processed on behalf of and for the needs of sukcesgroup.pl) and their activities are subject to the provisions of the applicable law and this Privacy Policy.

b) Sukcesgroup.pl may make the personal data of Users available to public authorities, including in relation to the conducted proceedings pertaining to the potential violations of the law or combating other potential violations of commonly applicable provisions.

7. As part of the adopted Privacy Policy, sukcesgroup.pl is liable for not selling the personal data of

Users.

8. In case of restructuring or sale of the conducted business or its part and transfer of the entire property or significant portion to a new owner, the personal data of Users may be transferred to the buyer for the purpose of ensuring continuation of provision of services as part of sukcesgroup.pl.

#### IV. How are personal data of Users protected?

1. The Data Controller has implemented the personal data security policy and IT system security policy in Sukces Technology Group which ensure efficient protection of your personal data.

2. Major elements of the personal data security system:

a) SSL Wild Card certificate which guarantees that communication between your computer and sukcesgroup.pl is encrypted with a use of a 256 bit key;

b) only employees of Sukces Technology Group - Dziemiańczuk spółka jawna who were trained in line with the personal data security policy and who have signed relevant obligation to protect personal data have access to your personal data.

c) the IT system of sukcesgroup.pl fulfils all standards of personal data protection.

3. Organisational and technical measures ensuring protection of processed data were applied in line with the requirements specified in the provisions on personal data protection, including the Regulation of the Minister of the Interior and Administration of 29 April 2004 on documentation for the processing of personal data and technical and organisational conditions of IT devices and systems used for personal data processing (Journal of Laws [Dz.U.] No. 100, item 1024) and guidelines of the General Inspector of Personal Data Protection.

4. The Data Controller has fulfilled all obligations foreseen in the law in the area of personal data protection, in particular the GDPR provisions and the Personal Data Protection Act.

#### V. For what purpose and which personal data of Users are processed?

##### A. Registration

During registration, we ask you to provide data that are necessary for setting up an account at sukcesgroup.pl, thanks to which you do not have to waste time during every subsequent purchase on completing the order form anew.

A registered client, after logging in, can also verify the status of the submitted order and history of purchases made. A registered and logged-in client may, at any moment, independently correct or supplement data from sukcesgroup.pl.

During registration, we ask you to provide:

1. first name and surname: necessary to issue a sales document and address the consignment;

2. address (street, house number or house and apartment number, postal code and city): necessary for us to address the consignment;

3. e-mail address: necessary to log-in on sukcesgroup.pl and to communicate in relation to the use of sukcesgroup.pl;

4. telephone number: necessary in case of selecting certain methods of delivery (required by the carriers) and, in exceptional cases, for communication with the store.

Data provided during registration are processed exclusively by sukcesgroup.pl and are not used in any other manner.

## B. Filing an order

When filing an order, we ask you to provide data that are necessary for processing the order; some of such data, in the case of registered and logged-in Clients, are automatically collected from the data provided during registration.

When filing an order, we ask you to provide:

1. first name and surname or name of company/ institution: necessary for issuing the sales document and addressing the consignment;
2. address (street, house number or house and apartment number, postal code and city): necessary for addressing the consignment;
3. e-mail address: necessary for communication related to the processing of the order;
4. telephone number: necessary in case of selecting certain methods of delivery (required by the carrier) and for communication with Sukces Technology Group.

If when filing an order the Client chooses delivery to a different address than the address specified during registration, we additionally ask you to provide:

1. first name and surname or name of company/ institution: necessary for addressing the consignment;
2. address (street, house number or house and apartment number, postal code and city): necessary for addressing the consignment;
3. telephone number to the consignment recipient: necessary in case of selecting certain methods of delivery (required by the carrier) and for communication with Sukces Technology Group.

If when filing an order the Client chooses issue of a sales document for other data than specified during registration or filing an order, we additionally ask you to provide:

1. first name and surname or name of company/ institution: necessary for issuing the sales document;
2. address (street, house number or house and apartment number, postal code and city): necessary for issuing the sales document;
3. VAT Reg. No. (NIP): necessary for issuing the sales document (in case of natural persons: PESEL number).

Data provided during filing an order are processed by [sukcesgroup.pl](http://sukcesgroup.pl) and the following entities in a scope specified below:

1. first name and surname, address, telephone number, e-mail address indicated as the address of delivery are provided to transport companies in the form of a label/ bill of lading which, at the same time, constitutes an order for delivering the consignment, depending on the selected type of consignment.

## C. Newsletter subscription

1. In case of the newsletter subscription and approval for its receipt during registration, use of the registration form on the [sukcesgroup.pl](http://sukcesgroup.pl) website or filing an order.
2. The newsletter is free of charge.
3. [Sukcesgroup.pl](http://sukcesgroup.pl) only asks for providing the e-mail address to which commercial information from the Data Controller will be sent in the form of a newsletter; you can resign from the subscription at any moment, by logging-in to your account at [sukcesgroup.pl](http://sukcesgroup.pl) or by clicking the unsubscribe link located in the footer of every newsletter.
4. [Sukcesgroup.pl](http://sukcesgroup.pl) determines the frequency of newsletter dispatch and its content.
5. The newsletter consists in sending, by [sukcesgroup.pl](http://sukcesgroup.pl), to the e-mail address specified by the User,

of messages containing information pertaining to the offer (including promotions) of products offered by sukcesgroup.pl, as well as events related to the promotion of products offered by sukcesgroup.pl.

6. The controller of data processed in relation to the newsletter is sukcesgroup.pl.

7. Personal data is processed on the basis of specification of an e-mail address for provision of the newsletter service.

8. In relation to the provision of the newsletter service, sukcesgroup.pl guarantees that persons whose personal data are processed may exercise the rights resulting from legal provisions, including the right of access to the content of own personal data, their rectification, change, removal or transfer, and furthermore the right to demand restriction of personal data processing and the right to lodge an objection against such processing upon principles specified in relevant provisions. Every data subject also has a right to lodge a complaint to the President of the Personal Data Protection Office.

9. Personal data pertaining to Users processed in relation to the provision of the newsletter service are protected by sukcesgroup.pl from their disclosure to unauthorised persons, as well as other cases of disclosure or loss or unauthorised modification of the above-mentioned data and information by means of applying relevant technical and organisational measures.

10. Complaints pertaining to the newsletter service are to be filed in a manner described in part IX of this document.

Data provided during newsletter subscription are processed by sukcesgroup.pl and the following entities:

a. FreshMail sp. z o.o., operator of website freshmail.pl

VI. Your personal data which are automatically collected after entering sukcesgroup.pl

#### A. sukcesgroup.pl (server)

The IT system that is used by sukcesgroup.pl automatically collects data in logs related to the devices that you use to connect with sukcesgroup.pl. Such data are collected exclusively for statistical purposes and refers to: type of device, operating system, type of Internet browser, screen resolution, colour depth, IP, provider of Internet services, or address of entry to sukcesgroup.pl and are used exclusively in the optimisation process of sukcesgroup.pl for the purpose of ensuring greatest comfort of use.

Such data are never combined with the provided data, referred to in part V, and only constitute material for statistical analysis and mechanisms for correcting system errors.

#### B. sukcesgroup.pl (cookies)

Sukcesgroup.pl uses the "cookies" technology, i.e. text files placed on your device, to allow sukcesgroup.pl to recognize you and to adjust sukcesgroup.pl to your needs.

Sukcesgroup.pl uses cookies to:

1. remember logging-in (the session lasts until the moment when the User logs out or until the browser is closed, unless the User's browser has the option of remembering the last session turned on, after which cookies are deleted).

2. offer an additional discount for products (the session lasts until the moment when the User, who was informed about such possibility, expresses willingness to use the discount, until the end of the promotion and afterwards the cookie is deleted).

3. prevent the display the panel allowing for saving the newsletter (session lasts: in case the User clicked the option "No, thank you" for 30 days, after which the cookies are deleted; in case the User clicked the cross closing the window: until the browser has been closed, unless the User's browser has the option of remembering the last session turned on, after which the cookies are deleted).

4. create statistics, visit reports as well as track the functioning of sukcesgroup.pl.

If you do not agree for the placement of cookies on your devices, you can block them by adequately configuring your Internet browser. You can find the information on how to do it in the help section of your Internet browser. Unfortunately, in case of blocking cookies that originate from sukcesgroup.pl, we cannot guarantee correct operation of sukcesgroup.pl.

If you agree for the placement of cookies on your device, but after completing the visit at sukcesgroup.pl you would like to delete them, you can do it without any risk and information on how to do it is available in the help files in your Internet browser.

### C. Google Analytics (cookies)

1. Google Analytics uses the cookies technology to allow sukcesgroup.pl to analyse the sources of traffic, devices used for the traffic and the manners in which the visitors use the website.

2. Google collects on its servers data procured from placement of cookies on devices and uses such information for the purpose of preparing reports and providing other services related to the traffic and Internet use.

3. Google may also transfer such information to third parties if it is liable for such transfer on the basis of legal provisions or if third parties process such information on behalf of Google.

Such data are never combined with the provided data, referred to in part V, and only constitute material for statistical analysis and mechanisms for correcting system errors.

If you do not agree for the placement of cookies on your devices, you can block them by configuring your Internet browser. You can find the information on how to do it in the help section of your Internet browser. Unfortunately, in case of blocking Google cookies, we cannot guarantee correct operation of sukcesgroup.pl.

If you agree for the placement of Google cookies on your device, but after completing the visit at sukcesgroup.pl you would like to delete them, you can do it without any risk and information on how to do it is available in the help files in your Internet browser.

### D. Google AdWords (Cookies)

1. Google AdWords uses cookie technology to allow sukcesgroup to evaluate the correctness and the efficiency of the conducted advertising activities with the use of AdWords network.

2. Google collects on its servers data procured from the placement of cookies on devices and uses such information for the purpose of preparing reports and providing other services related to the traffic and Internet use, including assuring that one and the same advertisement is not displayed to the same user all the time, as well as to detect and to block false advertisement clicks and to display advertisements which are better personalised (e.g. on the basis of information about pages visited earlier).

3. Google may also transfer such information to third parties if it is liable for such transfer on the basis of legal provisions or if third parties process such information on behalf of Google.

Such data are never combined with the provided data, referred to in part V, and only constitute material for statistical analysis and mechanisms for correcting system errors.

If you do not agree for the placement of cookies on your devices, you can block them by configuring your Internet browser. You can find the information on how to do it in the help section of your Internet browser. Unfortunately, in case of blocking Google cookies, we cannot guarantee correct operation of sukcesgroup.pl.

If you agree for the placement of Google cookies on your device, but after completing the visit at sukcesgroup.pl you would like to delete them, you can do it without any risk and information on how to do it is available in the help files in your Internet browser.

## VII. Making personal data of Users available

In special situations, when the applicable law imposes an obligation on the data controller to make the collected data available to state authorities, sukcesgroup.pl makes such data available. With the exception of such situations, your personal data will be disclosed exclusively in a scope, for the purpose of and to entities listed in this privacy policy.

## VIII. Changes in the security policy of sukcesgroup.pl

1. Sukcesgroup.pl reserves the right to change the privacy policy, if it is required by the binding law, if technological terms of operation of sukcesgroup.pl are changed or if the change introduces a higher standard than the legally required minimum.

2. Sukcesgroup shall provide information about such change via e-mail (to the e-mail address provided during registration).

3. The notification shall be sent at least 30 days before the entry into force of a new privacy policy.

4. The current text of the privacy policy is available at the following address: [https://sukcesgroup.pl/dokumenty/polityka\\_prywatnosci.pdf](https://sukcesgroup.pl/dokumenty/polityka_prywatnosci.pdf)

## IX. Contact

1. Sukcesgroup.pl contacts you by using the provided e-mail address and the telephone number is used only in exceptional cases.

2. In case of any questions or doubts pertaining to the privacy policy and security of your personal data, please contact us at the provided telephone number: +48 85 87 84 711, or via e-mail: [ado@sukcesgroup.pl](mailto:ado@sukcesgroup.pl).

3. If you would like to update or remove your personal data, and you cannot or do not want to do it on your own, please contact us at the provided telephone number: +48 85 87 84 711 or via e-mail: [ado@sukcesgroup.pl](mailto:ado@sukcesgroup.pl).

4. You can contact us with respect to the issues above at the following address:

Sukces Technology Group - Dziemiańczuk spółka jawna  
with its registered office in Wasilków, address: ul. Produkcyjna 2