## Privacy Policy and personal data protection

- 1. JJPM sp. z o.o. with its registered office in Warsaw (formerly "JJ Management" spółka z ograniczoną odpowiedzialnością sp. k.) respects the right to privacy of natural persons who are members of the bodies of a legal person (hereinafter referred to as the "Customers") using ADBL B2B website (hereinafter referred to as the "ADBL B2B Online Shop"). Our Privacy Policy informs how we process the personal and corporate data of our Customers, in particular:
  - (a) who the Controller of the personal data is;
  - (b) what categories of data are processed;
  - (c) for what purpose and on what basis we process the data;
  - (d) who the recipient of the data is;
  - (e) how long we process the data;
  - (f) what rights our Customers have.
- 2. The Controller of the personal data is JJPM sp. z o.o. with its registered office in Warsaw (formerly "JJ Management" spółka z ograniczoną odpowiedzialnością sp. k.) at ul. Rzeczycka 26 (04-940) Warsaw. Contact details for the Customers: e-mail: admin@adbl.eu, phone: 720 836 444 (on working days, Monday to Friday, from 8:00 a.m. to 4:00 p.m.).
- 3. Categories of the processed data:
  - a) full name;
  - b) business name;
  - c) registered office and delivery address;
  - d) registration number (REGON/NIP or other identification number within the EU and EEA);
  - e) telephone number;
  - f) e-mail address.
- 4. The Customer's personal and corporate data will be processed:
  - (a) on the basis of Article 6(1)(b) of the GDPR in order to:
  - register the Customer's Account in ADBL B2B Online Shop;
  - provide Customer service, including creating and managing the Customer's Account;
  - process Orders, conclude and perform the Sales Agreement;
  - issue and send accounting documents (including VAT invoices) in connection with the transactions concluded by the Customers in ADBL B2B Online Shop;
  - perform an agreement on the provision of online services, within the meaning of the provision of online services in accordance with § 3(1)(a) and (b) of the Regulations of ADBL
    B2B Online Shop for foreign businesses, on the basis of which the Customer uses an

Account at ADBL B2B Online Shop, including for the purposes of contact by e-mail, telephone or post in reasonable cases regarding the provision of information to the Customer to assist them in using ADBL B2B Online Shop or provision of technical support regarding the Customer's Account and operations carried out by the Customer in ADBL B2B Online Shop;

(b) on the basis of Article 6(1)(f) of the GDPR in order to:

- send e-mail messages containing commercial information, information regarding the operation and changes, as well as other information relevant to the operation of ADBL B2B Online Shop;
- (c) on the basis of Article 6(1)(b) of the GDPR in order to:
- fulfil the warranty obligation in case of purchase of buffing machines;
- (d) on the basis of Article 6(1)(f) of the GDPR in order to:
- fulfil the objectives resulting from the legitimate interests pursued by the Controller for the purposes of the complaint handling process.
- 5. Recipients of personal and corporate data will be courier companies, shipping companies and business partners on the basis of separate agreements concluded with the personal data Controller.
- 6. The Customer's personal and corporate data will not be transferred to any third country or to other international organisation.
- 7. The personal and corporate data will be stored until the expiry of the limitation period for claims of and against the personal data Controller and in accordance with the law.
- 8. Pursuant to Articles 15 to 21 of the GDPR, the Customer has the right:
  - a) to access the content of their data (Article 15 of the GDPR);
  - b) to rectify their data (Article 16 of the GDPR);
  - c) to erase their data (Article 17 of the GDPR);
  - d) to restrict processing of their data (Article 18 of the GDPR);
  - e) to data portability (in the case of data processed under Article 6(1)(b) of the GDPR) insofar as the data are processed by automated means (Article 20 of the GDPR);
  - f) to object to the processing of their data (in the case of data processed under Article 6(1)(f) of the GDPR) (Article 21 of the GDPR);

- g) to withdraw consent at any time without affecting the lawfulness of the processing (where the processing is based on consent) that was carried out on the basis of consent before its withdrawal.
- 9. If the Customer wishes to exercise their rights under Paragraph 8(a) to (g) of this Policy, they should contact the Controller, whose contact details have been provided for in Paragraph 2 of this Policy.
- 10. The Customer has the right to file a complaint to the President of the Personal Data Protection Office, ul. Stawki 2 (00-193) Warsaw), if they consider that the processing of their personal data is in breach with the provisions of the GDPR.
  - Provision of the personal and corporate data by the Customer is a prerequisite for creating an Account and concluding a Distribution Agreement and a Sales Agreement at ADBL B2B Online Shop, and thus for purchasing the brand goods offered by the Seller in ADBL B2B Online Shop.
- 11. The Customer is obliged to provide personal and corporate data (business name, registered office address, delivery address, registration number (within the meaning of Paragraph 3(d) of this Policy), phone number, e-mail address, and failure to provide the data will result in inability to create a Customer Account in ADBL B2B Online Shop, and thus to purchase the goods offered by the Seller in ADBL B2B Online Shop.
- 12. Erasure of the Customer's data from the database of ADBL B2B Online Shop, in accordance with the Customer's request referred to in Paragraph 8(c), (e) and (g), will result in deleting the Customer's Account from ADBL B2B Online Shop, and thus preventing the Customer from purchasing the goods offered by the Seller in ADBL B2B Online Shop.
- 13. The Customer's data will not be processed in an automated manner, including in the form of profiling.

## Information on methods and technical measures to detect and correct errors in the entered data:

- in the process of placing an Order, until the moment of pressing the "Order" button, Customers who have an Account in the Online Shop will have the possibility of correcting the entered data on their own by editing the Customer's Account profile;
- b) data verification or adjustment of the Order may also be done by sending an e-mail to the Seller to: b2b@adbl.eu;
- c) the Customer may change the data entered during Account creation at any time within the available options.

Information on the rules and methods of recording, securing and making available by the Seller to the other party of the content of the concluded agreement:

- a) recording, securing and making available of the content of the concluded Sales Agreement will be done by sending an appropriate e-mail to the Customer, in accordance with §9(3) of the Regulations of ADBL B2B Online Shop [link to the Regulations];
- b) recording, securing and making available of the content of the concluded Sales Agreement will be done by sending to the Customer, to the provided e-mail address, a confirmation of the placed order with information about accepting it for processing or by delivering Order specifications and proof of purchase to the Customer;
- c) the content of the concluded agreement will be additionally recorded and secured in the Seller's ICT system and made available to the Customer on request.