

# WEBSITE PRIVACY POLICY

## WHOLESALEHUNTER.COM

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## 1) GENERAL PROVISIONS

1. This Website privacy policy is for informational purposes, which means that it is not a source of obligations for Website Service Recipients. The Privacy Policy primarily contains rules regarding the Administrator's processing of personal data on the Website, including the basis, purposes and duration of personal data processing and the rights of data subjects, as well as information regarding the use of cookies and analytical tools on the Website.
2. The Administrator of the personal data collected through the Website is COMO, registered in the Central Register and Information on Business Activity of the Republic of Poland conducted by the minister competent for economy, having: address of the place of business and address for delivery: ul. Hebanowskiego 89a/5, 80-766 Gdańsk, NIP 8392907896, REGON 383785814 and e-mail address: office@wholesalerhunter.com - hereinafter referred to as the "Administrator" and being at the same time the Internet Service Provider.
3. Personal data on the Website are processed by the Administrator in accordance with applicable laws, in particular in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons in relation 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 "RODO" or "RODO Regulation". Official text of the RODO Regulation: <http://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX%3A32016R0679>.
4. The use of the Website, including the conclusion of contracts, is voluntary. Likewise, the related provision of personal data by the Customer using the Website is voluntary, subject to two exceptions: (1) entering into contracts with the Administrator - failure to provide in the cases and to the extent indicated on the Website and in the Terms and Conditions of the Website and this privacy policy of personal data necessary to conclude and perform an agreement for the provision of Electronic Services or any other agreement with the Administrator will result in the impossibility to conclude such an agreement. The provision of personal data in such a case is a contractual requirement, and if the data subject wishes to conclude a given agreement with the Administrator, he/she is obliged to provide the required data. Each time, the scope of data required to conclude a contract is indicated in advance on the Website and in the Terms and Conditions of the Website; (2) the Administrator's statutory obligations - the provision of personal data is a statutory requirement under the under generally applicable laws imposing an obligation on the Administrator to process personal data (e.g., processing data for accounting purposes), and failure to provide such data will prevent the Administrator from performing such obligations.
5. The Administrator shall exercise special care to protect the interests of persons whose personal data it processes, and in particular shall be responsible and ensure that the data it collects are: (1) processed in accordance with the law; (2) collected for designated legitimate purposes and not subjected to further

- processing incompatible with those purposes; (3) substantively correct and adequate in relation to the purposes for which they are processed; (4) kept in a form that allows identification of the subjects for no longer than necessary to achieve the purpose of the processing; and (5) processed in a manner that ensures adequate security of personal data, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage, by means of appropriate technical or organizational measures.
6. Taking into account the nature, scope, context and purposes of the processing and the risk of violation of the rights or freedoms of natural persons of different probability and severity, the Administrator shall implement appropriate technical and organizational measures to ensure that the processing is carried out in accordance with the RODO Regulation and to be able to demonstrate this. These measures are reviewed and updated as necessary. The Administrator shall apply technical measures to prevent unauthorized persons from obtaining and modifying personal data sent electronically.
  7. All words, phrases and acronyms appearing in this Privacy Policy and beginning with a capital letter (e.g., Service Provider, Website, Electronic Service) shall be understood as defined in the Terms and Conditions of the Website available on the Website.

## 2) GROUNDS FOR DATA PROCESSING

1. The Administrator shall be entitled to process personal data in cases where, and to the extent that, at least one of the following conditions is met: (1) the data subject has given his or her consent to the processing of his or her personal data for one or more specified purposes; (2) the processing is necessary for the performance of a contract to which the data subject is a party or to take action at the request of the data subject prior to entering into a contract; (3) the processing is necessary for the fulfillment of a legal obligation incumbent on the Administrator; or (4) processing is necessary for the purposes of 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 which require protection of personal data.
2. The processing of personal data by the Administrator requires each time the existence of at least one of the grounds indicated in Section. 2.1 of the Privacy Policy. The specific grounds for the Administrator's processing of the personal data of the Website's Service Recipients are indicated in the next section of the privacy policy - with respect to the particular purpose of the Administrator's processing of personal data.

## 3) PURPOSE, BASIS AND PERIOD OF DATA PROCESSING ON THE WEBSITE

1. In each case, the purpose, basis and period and recipients of personal data processed by the Administrator shall result from the activities undertaken by a given Service Recipient on the Website.
2. The Administrator may process personal data on the Website for the following purposes, on the following grounds and for the following period of time:

Purpose of data processing	Legal basis for data processing	Data retention period
Performing a contract for the provision of an Electronic Service, another contract, or taking action at the request of the data subject prior to the conclusion of the aforementioned contracts	Article 6(1)(b) of the RODO Regulation (performance of a contract) - processing is necessary for the performance of a contract to which the data subject is a party, or to take action at the request of the data subject prior to entering into a contract	The data are kept for the period necessary for the execution, termination or otherwise expiration of the concluded contract.
Direct marketing	Article 6(1)(f) of the RODO Regulation (legitimate interest of the Administrator) - processing is necessary for the purposes of the Administrator's legitimate interests - consisting of taking care of the interests and good image of the Administrator, its	The data shall be stored for the period of existence of the legitimate interest pursued by the Administrator, but no longer than the statute of limitations for the Administrator's claims against the data subject on account of the

	Website and striving to provide Electronic Services	Administrator's business activities. The period of limitation is determined by the provisions of law, in particular the Civil Code (the basic limitation period for claims related to the conduct of business activities is three years).  The Administrator may not process data for direct marketing purposes in the event of an effective objection in this regard by the data subject.
Marketing	Article 6(1)(a) of the RODO Regulation (consent) - the data subject has consented to the processing of his/her personal data for marketing purposes by the Administrator	The data is stored until the data subject withdraws his consent to further processing of his data for this purpose.
Keeping the tax books	Article 6(1)(c) of the RODO Regulation (legal obligation) in conjunction with Article 86 § 1 of the Tax Ordinance, i.e. of January 17, 2017. (Journal of Laws of 2017, item 201 as amended) - processing is necessary to fulfill the Administrator's legal obligation	The data shall be kept for the period required by law mandating the Administrator to keep tax books (until the expiration of the statute of limitations on tax liability, unless otherwise provided by tax laws).
Establish, assert or defend claims that the Administrator may assert or that may be asserted against the Administrator	Article 6(1)(f) of the RODO Regulation (legitimate interest of the Administrator) - processing is necessary for the purposes of the Administrator's legitimate interests - consisting of establishing, asserting or defending claims that the Administrator may raise or that may be raised against the Administrator	The data are kept for the period of existence of the legitimate interest pursued by the Administrator, but no longer than for the period of limitation of claims that may be raised against the Administrator (the basic limitation period for claims against the Administrator is six years).
Use of the Website and ensuring its proper operation	Article 6(1)(f) of the RODO Regulation (legitimate interest of the Administrator) - the processing is necessary for the purposes of the Administrator's legitimate interests - consisting of the operation and maintenance of the Website	The data shall be kept for the period of existence of the legitimate interest pursued by the Administrator, but no longer than the statute of limitations for claims by the Administrator against the data subject for the Administrator's business activities. The period of limitation is determined by the provisions of law, in particular the Civil Code (the basic limitation period for claims related to the conduct of business activities is three years).
Keeping statistics and analyzing traffic on the Website	Article 6(1)(f) of the RODO Regulation (legitimate interest of the Administrator) - processing is necessary for the purposes of the Administrator's legitimate interests - consisting of conducting statistics and analysis of traffic on the Website in order to improve the functioning of the Website and increase the reach of the Electronic Services provided	The data shall be kept for the period of existence of the legitimate interest pursued by the Administrator, but no longer than the statute of limitations for claims by the Administrator against the data subject for the Administrator's business activities. The period of limitation is determined by the provisions of law, in particular the Civil Code (the basic limitation period for claims related

		to the conduct of business activities is three years).
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#### 4) RECIPIENTS OF DATA ON THE WEBSITE

1. For the proper functioning of the Website, including for the proper provision of Electronic Services by the Administrator, it is necessary for the Administrator to use the services of third parties (such as software provider, payment processor). The Administrator shall only use the services of such processors who provide sufficient guarantees for the implementation of appropriate technical and organizational measures so that the processing meets the requirements of the RODO Regulation and protects the rights of data subjects.
2. Transfer of data by the Administrator does not take place in every case and not to all recipients or categories of recipients indicated in the privacy policy - the Administrator transfers data only when it is necessary to achieve a given purpose of personal data processing and only to the extent necessary to achieve it.
3. The personal data of Website Service Recipients may be transferred to the following recipients or categories of recipients:
  - a. **entities handling electronic or credit card payments** - in the case of a Customer who uses the method of electronic or credit card payments on the Website, the Administrator shall make the collected personal data of the Customer available to the selected entity handling the above payments on the Website on behalf of the Administrator to the extent necessary to handle the payment made by the Customer.
  - b. **service providers supplying the Administrator with technical, IT and organizational solutions that enable the Administrator to run its business, including the Website and Electronic Services provided through it.** (in particular, providers of computer software to run the Website, providers of e-mail and hosting, and providers of business management and technical support software to the Administrator) - the Administrator shall make the collected personal data of the Service Recipient available to the selected provider acting on the Administrator's behalf only in the case and to the extent necessary to realize the given purpose of data processing in accordance with this Privacy Policy.
  - c. **providers of accounting, legal and advisory services providing accounting, legal or advisory support to the Administrator** (in particular, an accounting office, law firm or debt collection company) - the Administrator shall make the collected personal data of the Service Recipient available to the selected provider acting on its behalf only in the case and to the extent necessary to realize the given purpose of data processing in accordance with this Privacy Policy.
  - d. **providers of social plug-ins, scripts, and other similar tools placed on the Website that enable the browser of a visitor to the Website to retrieve content from providers of said plug-ins** (e.g., logging in with social network login information) and to transmit the visitor's personal information to those providers for that purpose, including:
    - i. **Facebook Ireland Ltd.** - The Administrator uses Facebook's social plug-ins on the Website (e.g., Like button, Share, or login using Facebook login information) and therefore collects and shares the personal data of the Service Recipient using the Website to Facebook Ireland Ltd. (4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland) to the extent and in accordance with the privacy policy available here: <https://www.facebook.com/about/privacy/> (this data includes information about activities on the Website - including information about the device, sites visited, purchases, ads displayed, and use of services - regardless of whether the Service Recipient has a Facebook account and is logged into Facebook).

#### 5) PROFILING ON THE WEBSITE

1. The RODO Regulation imposes an obligation on the Administrator to inform about automated decision-making, including profiling, as referred to in Article 22 (1) and (4) of the RODO Regulation, and - at least in

these cases - relevant information about the principles of decision-making, as well as about the significance and anticipated consequences of such processing for the data subject. With this in mind, the Administrator provides information on possible profiling in this section of the privacy policy.

2. The Administrator may use profiling on the Website for direct marketing purposes, but the decisions made by the Administrator on its basis do not relate to the conclusion or refusal of an agreement or the possibility of using Electronic Services on the Website. The effect of using profiling on the Website may be, for example, to grant a person a discount, to remind him/her of unfinished activities on the Website, to send a proposal for an Announcement that may match the person's interests or preferences, or to offer better terms and conditions compared to the Website's standard offer. Despite the profiling, it is the person who freely decides whether he or she will want to take advantage of the received discount or the Administrator's offer in this way.
3. Profiling on the Website involves the automatic analysis or prediction of a person's behavior on the Website, e.g. by analyzing a person's previous purchase history or other activities on the Website. The condition for such profiling is that the Administrator has the person's personal data in order to be able to then send the person, for example, a discount or offer.
4. The data subject has the right not to be subject to a decision that is based solely on automated processing, including profiling, and that produces legal effects on the person or materially affects that person in a similar manner.

## 6) RIGHTS OF THE DATA SUBJECT

1. **Right of access, rectification, restriction, erasure or portability** - the data subject has the right to request from the Administrator access to his/her personal data, rectification, erasure ("right to be forgotten") or restriction of processing, and has the right to object to processing, and has the right to portability of his/her data. The detailed conditions for exercising the rights indicated above are indicated in Articles 15-21 of the RODO Regulation.
2. **Right to withdraw consent at any time** - a person whose data is processed by the Administrator on the basis of expressed consent (pursuant to Article 6(1)(a) or Article 9(2)(a) of the RODO Regulation), then he/she has the right to withdraw consent at any time without affecting the legality of the processing performed on the basis of consent before its withdrawal.
3. **Right to lodge a complaint to a supervisory authority** - a person whose data is processed by the Administrator has the right to lodge a complaint to a supervisory authority in the manner and mode specified in the provisions of the RODO Regulation and Polish law, in particular the Personal Data Protection Act. The supervisory authority in Poland is the President of the Office for Personal Data Protection.
4. **Right to object** - The data subject has the right to object at any time - on grounds relating to his or her particular situation - to the processing of personal data concerning him or her based on Article 6(1)(e) (public interest or tasks) or (f) (legitimate interest of the Administrator), including profiling under these provisions. In such a case, the Administrator shall no longer be allowed to process such personal data, unless the Administrator demonstrates the existence of compelling legitimate grounds for the processing overriding the interests, rights and freedoms of the data subject, or grounds for establishing, asserting or defending claims.
5. **Right to object to direct marketing** - if personal data are processed for the purposes of direct marketing, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such marketing, including profiling, to the extent that the processing is related to such direct marketing.
6. In order to exercise the rights referred to in this section of the privacy policy, the Administrator may be contacted by sending an appropriate message in writing or by e-mail to the Administrator's address indicated at the beginning of the privacy policy.

## 7) WEBSITE COOKIES AND ANALYTICS

1. Cookies are small text information in the form of text files, sent by the server and stored on the side of the visitor to the Website (e.g. on the hard drive of a computer, laptop, or smartphone memory card - depending on the device used by the visitor to the Website). Detailed information on cookies, as well as the

history of their creation can be found, among other things, here:

[https://en.wikipedia.org/wiki/HTTP\\_cookie](https://en.wikipedia.org/wiki/HTTP_cookie).

2. Cookies that can be sent by the Website can be divided into different types, according to the following criteria:

<b>By their provider:</b>	<b>Due to their storage period on the device of the visitor of the Website:</b>	<b>Due to the purpose of their use:</b>
1) their own (created by the Administrator's website) and 2) belonging to third parties (other than the Administrator)	1) session (stored until you log out of the Website or shut down your web browser) and 2) permanent (kept for a certain period of time, defined by the parameters of each file or until manually deleted)	1) necessary (to enable the proper functioning of the Website), 2) functional/preferential (allowing the Website to adapt the page of the Website to the visitor's preferences), 3) analytical and performance (gathering information about the use of the Website), 4) marketing, advertising, and social media (collecting information about a visitor to a Website page for the purpose of displaying personalized advertising to that person and conducting other marketing activities, including on websites separate from the Website, such as social networking sites)

3. The Administrator may process data contained in cookies when visitors use the Website for the following specific purposes:

<b>Purposes of using cookies on the Administrator's Website</b>	
	Identify Service Recipients as logged in to the Website and show that they are logged in (essential cookies)
	storing data from completed forms, surveys or login data to the Website (essential and/or functional/preference cookies)
	adapting the content of the Website to the individual preferences of the Customer (e.g. concerning colors, font size, page layout) and optimizing the use of the pages of the Website (functional/preference cookies)
	keeping anonymous statistics showing how the Website is used (analytical and performance cookies)
	remarketing, that is, studying the behavioral characteristics of visitors to the Website by anonymously analyzing their actions (e.g., repeated visits to certain pages, keywords, etc.) in order to create their profile and provide them with ads tailored to their anticipated interests, including when they visit other websites on the advertising network of Google Ireland Ltd. and Facebook Ireland Ltd. (marketing, advertising and social networking cookies)

4. Checking in the most popular web browsers what cookies (including the duration of cookies and their provider) are sent at any given time by the Website is possible as follows:

<b>In Chrome browser:</b>	<b>In Firefox browser:</b>	<b>In Internet Explorer:</b>
(1) in the address bar, click on the	(1) in the address bar, click on the shield icon on the left, (2) go to the "Allowed" or "Blocked" tab, (3) click	(1) click the "Tools" menu, (2) go to the "Internet Options" tab, (3) go to the "General" tab, (4) go to the

padlock icon on the left, (2) go to the "Cookies" tab.	on the box "Inter-site tracking cookies", "Social network tracking elements" or "Content with tracking elements"	"Settings" tab, (5) click the "View Files" box
<b>In the Opera browser:</b> (1) in the address bar, click on the padlock icon on the left, (2) go to the "Cookies" tab.	<b>In the Safari browser:</b> (1) click the "Preferences" menu, (2) go to the "Privacy" tab, (3) click in the "Manage Site Data" box	<b>Regardless of the browser, using tools available on the site, for example:</b> <a href="https://www.cookie-matrix.com/">https://www.cookie-matrix.com/</a> or: <a href="https://www.cookie-checker.com/">https://www.cookie-checker.com/</a>

5. By default, most web browsers available on the market accept the storage of cookies by default. Everyone has the ability to determine the conditions of use of Cookies through the settings of their own web browser. This means that you can, for example, partially restrict (e.g. temporarily) or completely disable the possibility of storing Cookies - in the latter case, however, this may affect some functionalities of the Website.
6. The settings of your Internet browser regarding Cookies are relevant to your consent to the use of Cookies by our Website - in accordance with the regulations, such consent can also be given through the settings of your Internet browser. Detailed information on how to change the settings for Cookies and how to delete them yourself in the most popular web browsers is available in the help section of your web browser and on the following pages (just click on the link):
  - [in Chrome browser](#)
  - [in Firefox browser](#)
  - [in Internet Explorer](#)
  - [in Opera browser](#)
  - [in Safari browser](#)
  - [in the Microsoft Edge browser](#)
7. The Administrator may use Google Analytics, Universal Analytics services provided by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland) on the Website. These services help the Administrator keep statistics and analyze traffic on the Website. The data collected is processed by the above services to generate statistics to help in administering the Website and analyzing traffic on the Website. This data is of an aggregate nature. When using the above services on the Website, the Administrator collects such data as sources and medium of acquisition of visitors to the Website and their behavior on the Website, information on the devices and browsers from which they visit the Website, IP and domain, geographic data and demographic data (age, gender) and interests.
8. It is possible for a person to easily block the sharing of information about his/her activity on the Website with Google Analytics - for this purpose, for example, you can install a browser add-on provided by Google Ireland Ltd. available here: <https://tools.google.com/dlpage/gaoptout?hl=en>.

## 8) FINAL PROVISIONS

The Website may contain links to other websites. The Administrator urges you, when you go to other sites, to read the privacy policy established there. This privacy policy applies only to the Administrator's Website.