

## PRIVACY POLICY

The administrator of personal data, whose processing principles are described in this document, is Rollen Polska - Studio Figura Izabella Michalak with headquarters in Lusówko, ul. Wiązowa 56, 62 - 080 Tarnowo Podgórne, entered into the Central Register of Economic Activities, address of running a business is Lusówko, ul. Wiązowa 56, 62-080 Tarnowo Podgórne, NIP 7831266218, REGON 300224173 (referred to in this policy as "we", "us", "our" or "Studio Figura International"). To contact us, please send a message:

- to the e-mail address: [admin@studiofigura.com.pl](mailto:admin@studiofigura.com.pl)
- or by traditional post to the following address: ul. Skórzewska 26, 62-081

You can also contact the data protection officer appointed by Bernadetta Gronowska us at the following e-mail address: [ido@studiofigura.com.pl](mailto:ido@studiofigura.com.pl)

We are committed to the proper conduct of collecting, using and protecting your personal data. Therefore, we have developed this privacy policy and cookies ("Policy"), which:

- defines the types of personal data we collect;
- explains how and why we collect and use your personal information and how long we store it;
- explains when and why we will share personal information with other organizations; and
- explains the rights and options that you have when it comes to your personal data

The Policy is applicable if you use our services (referred to in this Policy as "our Services").

**By using our Services, we mean:**

- use of any website located on our domains (studiofigura.com.pl, bezajo.com, roll-shaper.com.pl, roll-shaper.ru, rollshape.co.uk, rollshaper.co.uk, rollshaper.lv , rollshaper.ru, rollshaper.us, studio-figura.lt, studio-figura.ru, studiofigura24.com, studiofigura.co.uk, studiofigura.pl, studiofigura.us, swanshaper.com, swanshaper.pl)
- making purchases at Studio Figura International (sklep.studiofigura.com.pl)
- subscribing to the electronic communication in the field of direct marketing, such as the newsletter with the help of Click funnels, Chatfuel, Get Response.
- contacting us via social media such as: Facebook, Messenger, Instagram, Google+, Printerest,

- This Policy also applies if you contact us or we contact you regarding our Services using the contact form, e-mail, SMS, chat, social media.

Our Websites may contain links to other websites maintained by other organizations that have their own privacy policies. Before providing any personal data on such websites, please read carefully the regulations and the privacy policy posted there, as we do not accept any responsibility for the websites of other organizations.

## WHICH DATA WE PROCESS AND ON WHAT RULES

DATA CATEGORIES	PROCESSING PURPOSE	PROCESSING RANGE	LEGAL BASIS FOR PROCESSING
Data of unregistered users of our Services	Through our websites, we collect data only to the extent that is necessary to manage these websites, ensure the smooth operation of the functionalities offered within them and analyze the effectiveness of communication.	We do not require registration for website users. This data is anonymous to us. During the session, the Service saves cookie files to the user's	Art.6 par.1letterf) GDPR (processing is necessary for purposes arising from legitimate interests pursued by the administrator)

DATA CATEGORIES	PROCESSING PURPOSE	PROCESSING RANGE	LEGAL BASIS FOR PROCESSING
	<p>This data is processed for statistical purposes, used to test user activity in the Service and the level of attractiveness of individual elements of the Service, as well as to increase your convenience and improve your satisfaction with using them</p>	<p>browser. Information about your online behavior while browsing our Websites Information about any devices you use to access our Services(including model brand, operating system, IP address, browser type and identifiers of mobile devices, date and time of access to our Services, website address from which you were redirected to our website, other data sent via standard HTTP(s) request headers , data used to maintain the online session after logging in).</p>	
<p>Data of registered users of our Services</p>	<p>In order to provide services</p> <p>Management of the accounts you have with us, including accounts at sklep.studiofigura.com.pl</p> <p>Solve disputes, consider complaints or claims</p>	<p>Data identifying you, including postal address, address to which bills are to be sent, e-mail addresses, telephone numbers Login details for your account, such as username. Information about your orders and purchases (for example about what you bought, when</p>	<p>Art. 6 par. 1 letter. b) GDPR (processing is necessary for the performance of a contract to which the data subject is party or take action at the request of the data subject prior to the conclusion of the contract)</p>

DATA CATEGORIES	PROCESSING PURPOSE	PROCESSING RANGE	LEGAL BASIS FOR PROCESSING
		<p>and where you bought it and how you paid for it)</p> <p>Information about your online behavior while browsing our Websites</p> <p>Information about any devices you use to access our Services(including model brand, operating system, IP address, browser type and identifiers of mobile devices, date and time of access to our Services, website address from which you were redirected to our website, other data sent via standard HTTP(s) request headers , data used to maintain the online session after logging in).</p>	
Data of people purchasing on our Services	<p>In order to fulfill orders and returns</p> <p>in order to fulfill statutory obligations on the Administrator, resulting in particular from tax regulations and accounting regulations - the legal basis for processing is the</p>	<p>. During this time, we collect:</p> <ul style="list-style-type: none"> <li>- purchase and transaction data</li> <li>- contact details</li> <li>- delivery / reception details.</li> </ul> <p>We will not be able to provide you with your products or services if you do not provide us</p>	<p>Art. 6 par. 1 letter. b) GDPR (processing is necessary for the performance of a contract to which the data subject is party or take action at the request of the data subject</p>

DATA CATEGORIES	PROCESSING PURPOSE	PROCESSING RANGE	LEGAL BASIS FOR PROCESSING
	legal obligation (Art. 6 (1) (c) of the GDPR);	with this information.	prior to the conclusion of the contract)
	in order to set and enforce claims or defend against them - the legal basis of the processing is the legitimate interest of the Administrator (Article 6 par.1 letter f) GDPR relying on the protection of his or her rights.	- in the scope of other data processing operations occurring after the order has been completed	Art.6 par.1 letter f) GDPR (processing is necessary for purposes resulting from legitimate interests pursued by the administrator)
Data of people contacting us regarding our Services, taking part in promotions, contests, questionnaires	Contacting you, for example by phone, email, letter or responding to your social media and chat posts that have been directed to us regarding our services. We want to serve you better as our client, therefore we use personal information to provide explanations or help in response to your communications, as well as to inform you about the changes we have made or intend to introduce in our Services that affect you (e.g. changes to this Policy or regulations of our Services).	Personal data provided by you each time you contact us regarding our Services (for example, your name, username and contact details), including by phone, email or post, or when you contact us via social media . Details of e-mails that we send to you that you open, including any links in them that you click on (for example, those that allow us to determine if and when you opened such communication)	Art.6 par.1 letter f) GDPR (processing is necessary for purposes resulting from legitimate interests pursued by the administrator)with the fact that if we want to invite you electronically, such as e-mail or SMS, we will be based on your consent.
	Management of the promotions and		Art.6 par.1 letter f) GDPR

DATA CATEGORIES	PROCESSING PURPOSE	PROCESSING RANGE	LEGAL BASIS FOR PROCESSING
	<p>contests in which you participate</p> <p>We must process your personal data so that we can manage the promotions and contests to which you want to apply.</p>		(processing is necessary for purposes resulting from legitimate interests pursued by the administrator)with the fact that if we want to invite you electronically, such as e-mail or SMS, we will be based on your consent.
Data of people visiting our headquarters	Monitoring the security of our headquarters. In order to protect our business, local community, customers and our employees.	Recordings of the image of your person can be recorded by video surveillance (CCTV) devices and stored in our systems along with the date and time of your visit	Art.6 par.1 letter f) GDPR (processing is necessary for purposes resulting from legitimate interests pursued by the administrator)

*The period of personal data processing*

The period of data processing by the Administrator depends on the type of service provided and the purpose of the processing . As a rule, the data is processed by the time the service is provided or the order is being processed, until the consent is withdrawn or the effective opposition to data processing is filed in cases where the legal basis for data processing is the Administrator's legitimate interest.

The data processing period may be extended if the processing is necessary to establish and assert any claims or defend against them, and after that time only in the case and to the extent that will be required by law. After the end of the processing period, the data is irreversibly deleted or anonymised.

## USER'S RIGHTS

### **Data subjects have the following rights:**

( Podkreśliłam prawa, które funkcjonują w wersji oficjalnej w j. ang). Przetłumaczyłam też dosłownie to co było w wersji do tłumaczenia. Myślę, że tu lepiej zostawić oficjalne sformułowania□)

1. The right to be informed about the processing of personal data
  - on this basis, the Administrator provides the person making such a request with information about the processing of personal data, in particular about the purposes and legal grounds of processing, the scope of data held, entities to which personal data are disclosed and the planned date of their removal
  
2. The right to obtain a copy of the data – (the right of access)
  - on this basis, the Administrator provides a copy of the processed data concerning the person who makes the request
  
3. The right to rectification
  - on this basis, the Administrator removes any non-conformities or errors regarding the personal data being processed, and completes or updates them if they are incomplete or have changed;
  
4. The right to erasure data (or the right to be forgotten)
  - on this basis, it is possible to require the erasure of data, the processing of which is not necessary for pursuing any of the purposes for which they were collected
  
5. The right to limit processing ( the right to restriction of processing)
  - on this basis, the Administrator ceases to conduct operations on personal data, with the exception of operations for which the data

subject consented

and ceases their storage, in accordance with the established retention rules, or until the reasons for the restriction of data processing have ceased to exist (eg. a supervisory decision will be issued, allowing further processing of data);

#### 6. The right to data portability –

- on this basis, to the extent that the data is processed in connection with the concluded agreement or consent, the Administrator issues data provided by the person they concern in a format that allows their reading on the computer. It is also possible to request sending that data to another entity - on condition however, that there are technical possibilities in this regard, both on the part of the Administrator and the other entity;

#### 7. The right to object (to other purposes of data processing)

- the data subject may at any time object to the processing of personal data on the basis of a justified interest of the Administrator

#### 8. The right to withdraw consent (The right in the scope of consent)–

- if the data are processed on the basis of consent, the data subject has the right to withdraw it at any time, which however does not affect the legality of the processing carried out prior to the withdrawal of the consent;

#### 9. The right to complain–

- In case of recognition that the processing of personal data violates the GDPR regulations or other regulations regarding the protection of personal data, the data subject may file a complaint to the President of the Data Protection Office. (as specified on the website of the Office for Personal Data Protection).

Applications to Studio Figura International regarding the implementation of the above rights may be submitted:

- in writing to the following address: Studio Figura International, ul. Skórzewska 26, 62-081 Wysogotowo.
- by e-mail to the following address: kontakt@studiofigura.pl

The answer will be provided to the e-mail address from which the application was sent and in the case of letters sent by letter to the address provided by the applicant, unless the applicant would be willing in the letter to receive feedback via e-mail (in this case, please provide the e-mail address).

## **DATA RECEIVERS**

We entrust personal data for processing to entities with whom we cooperate on a permanent basis, in particular suppliers responsible for IT systems, entities providing accounting, legal, auditing, consulting services, couriers (in connection with the implementation of the contract), companies supporting our marketing activities (in the scope of marketing services) and entities associated with the Administrator, including his or her business partners.

These entities operate on the basis of entrustment agreements and are equally obliged to protect personal data.

In addition, in the case of using traditional post, we provide personal data to the Polish Post Office and other companies operating on the basis of postal law.

The Administrator reserves the right to disclose selected information about the User to the competent authorities or third parties who submit a request for such information, based on an appropriate legal basis and in accordance with the applicable law.

## **SAFETY MEASURES WE USE**

We use computer security such as firewalls and data encryption, and we enforce physical access controls to our buildings and files to ensure the security of this data.

We allow access only to employees and subcontractors who need it to perform their official duties.

- We protect the security of your data during transmission by encrypting them using the Secure Sockets Layer (SSL) .

- We enforce physical, electronic and organizational security measures in the collection, storage and disclosure of personal data. According to circumstances, we may ask you to confirm your identity before we disclose your personal information.

Personal data that we collect from you may be transferred and stored at a destination outside the European Economic Area ("EEA"). They can also be processed by companies operating outside the EEA which work for us or for one of our Service Providers.

In this case, we ensure that your right to privacy is respected in accordance with this Policy  
The most common way that we use to achieve this goal is to

enter into a specific type of contract, using standard contractual clauses (so-called Model Clauses) or based on an approved package of privacy protection principles, such as the Privacy Shield, which is applicable when transferring data to the USA. More information on data transfer outside the EEA, including a copy of the Model Clauses, can be found at: [https://ec.europa.eu/info/law/law-topic/data-protection\\_pl](https://ec.europa.eu/info/law/law-topic/data-protection_pl)

## COOKIES AND SIMILAR TECHNOLOGIES

We and our partners use cookies and similar technologies, including such as tags ("cookies"), to personalize and improve the quality of service when you use our Websites. This section contains more information about cookies, including how we use them and how you can make choices about the use of cookies

### How we use cookies

Cookies are small text files containing a unique identifier that are stored on a computer or mobile device, thanks to which a device can be recognized when using a specific website or a mobile application.

They can be used only for the duration of your visit or they can be used to measure your interaction with services and content for a certain period of time. Cookies help with providing important functions and functionalities of our Websites and with improving the quality of your use of them.

If you agree to the use of cookies in our Services, they may be used for the following purposes:

Improving the operation of our Websites and Mobile Applications	Cookies allow us to improve the way our websites operate so that we can personalize your experience as a client and enable you to take advantage of many useful functions they offer. For example, we use cookies to remember the preferences and contents of your basket when you return to our Websites and Mobile Apps.
Improving the efficiency of our Websites	Cookies can help us understand how our Websites and Mobile Applications are used.

and Mobile Applications

For example, to inform us if there are error messages when using them. Cookies of this type collect data, which are mostly aggregated and anonymized

Measuring the effectiveness of our marketing messages, including online advertising

. Cookies may tell us whether you have seen a particular advertisement and how much time has passed since it was displayed to you. This information allows us to measure the effectiveness of our online advertising campaigns and control how many times the ad was displayed to you. We also use cookies to measure the effectiveness of our marketing messages, For example, by letting us know that you have opened a marketing e-mail message sent to you. Cookies are also used for monitoring statistics on our websites. In particular, they allow us to observe anonymous information on the number of people visiting our websites, specifying the geographical area, browser used, operating system, type of device used to display the page.

**COOKIES MANAGEMENT**

Cookies in a web browser

With the help of browser settings, you can accept or reject new cookies and delete existing ones. You can also set your browser to notify you whenever new cookies are placed on your computer or other device. More detailed information on how to manage cookie files can be found by using the help function available in your web browser. If you decide to disable some or all of your cookies, you may not be able to take full advantage of our Websites. For example, you may not be able to add products to your shopping basket, to finalize transactions, or use those of our products and services that require you to log in. Third parties acting through our Websites

Below is a list of our key partners along with information about the services that we provide. This list does not include all partners, but includes those with whom we have established relationships and whose technologies, in terms of cookies, are most often used in our Services.

Measurements and	<a href="#">Google Analytics</a>
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personalization	Analysis of the use of our services, including testing of different versions of our websites in terms of content. The analysis data can also be used to personalize our services and for marketing our services.	
Social media	Reaching you through social media platforms to share content and information and interacting with users through the use of our websites These companies can use your data for their own purposes, including profiling and sending you messages using other ads	<a href="#">Facebook</a> <a href="#">Twitter</a>
Electronic payments	Realization of payments for purchases in the online store	T-pay.com