

## **Privacy Policy\_v.20122023**

### **PRIVACY POLICY**

This Privacy Policy sets out the principles of collecting, processing, and using personal data obtained from you by the website [www.wow-garden.pl](http://www.wow-garden.pl) (hereinafter referred to as the "Website" or the "Site"), operated by WOWgarden Sp. z o.o., with its registered office in Poznań, in accordance with the applicable provisions, in particular the provisions of 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 (GDPR).

### **1. WHO PROCESSES YOUR DATA?**

The controller of your personal data is WOWgarden Sp. z o.o., with its registered office in Poznań ("We").

Contact:

You can contact us by mail at:

WOWgarden Sp. z o.o.

Ul. 28 Czerwca 1956r nr 406

61-441 Poznań

or by email: [info@wow-garden.pl](mailto:info@wow-garden.pl)

### **2. WHAT DATA DO WE COLLECT?**

As part of the operation of the Website, we may ask you to provide us with certain information, including personal data. The data we collect includes, as applicable:

- First name
- Email address
- Unique user identifier
- Data regarding your activity on the Website, including click analytics
- Device identifier
- Browser type, domain and communication language, operating system and related settings
- Country
- Time zone
- Websites visited
- Cookies
- IP addresses

We also collect, use and share aggregated data such as statistical or demographic information. For example, we may aggregate usage data of our Website to calculate the percentage of Users accessing a specific feature of the Website. However, if we combine or connect aggregated data with your personal data in a way that directly or indirectly identifies you, we treat such combined data as personal data.

We do not collect special categories of personal data (including data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health-related data, sexuality or sexual orientation). We also do not collect information relating to criminal convictions or offences.

Our Website is not intended for use by children, and we do not knowingly collect data relating to children.

Providing your data is voluntary, but failure to do so may result in the inability to use certain services on our Website.

### **2.3. SERVER LOGS**

Each use of the Website involves sending a request to our server. Individual requests are saved in server logs and stored there. The data contained in the logs include: your IP address, the time of the request, the time the response was sent, browser information, and the user's operating system. These data are not associated with any specific individuals using the Website, nor are they used to identify Users in any way. They are used solely for server administration purposes.

### **2.4. COOKIES**

Our Website collects data contained in cookies. Cookies are small text files sent by the Website and stored on your device, containing certain information related to your use of the Website.

Cookies are used, among other purposes, to enable the proper functioning of our Website, ensure correct display, and allow the use of all its functions, as well as to protect the Website against misuse and spam.

Depending on the consents you have granted, we may use cookies to analyse traffic on our Website.

### **3. PURPOSES FOR WHICH WE COLLECT YOUR PERSONAL DATA AND LEGAL BASIS**

As part of the operation of the Website, we process your data, as applicable, for the following purposes:

1. To analyse your activity (including profiling) on the Website – based on your consent [Article 6(1)(a) GDPR].
2. To compile general statistics on users' use of the Website – based on our legitimate interest [Article 6(1)(f) GDPR].
3. To enable Website Users to manage their consents for cookie installation – based on our legitimate interest [Article 6(1)(f) GDPR].
4. In the case of using the contact form, your personal data are processed to respond to inquiries, maintain business relations, perform contracts, and maintain ongoing contact – based on our legitimate interest [Article 6(1)(f) GDPR].
5. To enable Website Users to use the Chat functionality – based on our legitimate interest [Article 6(1)(f) GDPR].
6. To perform technical operations and resolve technical problems related to the administration of the Website – based on our legitimate interest [Article 6(1)(f) GDPR].
7. To store data for accountability purposes – based on our legitimate interest [Article 6(1)(f) GDPR].
8. Where processing of your data is required by law – based on a legal obligation [Article 6(1)(c) GDPR].
9. To establish, exercise, or defend legal claims – based on our legitimate interest [Article 6(1)(f) GDPR].
10. To ensure the security and integrity of electronic services, including preventing fraud, spam, and abuse – based on our legitimate interest [Article 6(1)(f) GDPR].

### **4. TOOLS WE USE**

To optimize the use of information contained, among others, in cookies, we use analytical tools. These tools also allow us to process the collected information in a way that supports our research and development work. Depending on the consents you have given us, your personal data may be processed automatically, including in the form of profiling.

#### **4.1. COOKIE MANAGEMENT PLUGIN – COMPLIANZ – GDPR/CCPA COOKIE CONSENT**

To lawfully enable users of our Website to express consent for the installation of relevant cookies and, where applicable, the related processing and disclosure of personal data, we use the Complianz – GDPR/CCPA Cookie Consent plugin. Complianz operates on our hosting provider's server and does not share or access personal data. User consent is documented using an anonymized IP, browser information, website URL, date/time, and an encrypted

key. Legal basis: our legitimate interest (accountability principle under GDPR).

#### **4.2. GOOGLE reCAPTCHA**

Our Website uses Google's reCAPTCHA service to prevent spam and abuse. It collects device and browser information and may analyse user behaviour. Data are sent to Google for analysis under its Privacy Policy and Terms of Service. Legal basis: legitimate interest [Art. 6(1)(f) GDPR].

#### **4.3. GOOGLE ANALYTICS**

We use Google Analytics to monitor Website activity and generate reports. Data such as visit duration, pages visited, IP, and browser type are collected. Your IP address is anonymized. Data are stored for 14 months. You can opt out by using Google's Opt-out Browser Add-on.

#### **4.4. GOOGLE ADS**

Google Ads enables personalized advertising on Google's ad network and YouTube. Google may use cookies and web beacons for ad performance measurement. Users may disable ad personalization via Google Ads Settings or export their data via the My Activity tool.

#### **4.5. GOOGLE SIGNALS**

Google Signals allows for cross-device analytics when users enable ad personalization. The collected data are aggregated and anonymized.

#### **4.6. GOOGLE TAG MANAGER**

Google Tag Manager enables managing scripts and tracking user interactions (events) on the Website. It processes user data such as online identifiers and IP addresses.

#### **4.7. DATA TRANSFER OUTSIDE THE EEA**

In connection with Google tools, personal data may be transferred to third countries, including the USA, under Google's participation in the EU-US Data Privacy Framework or based on Standard Contractual Clauses (SCCs) approved by the European Commission.

#### **4.8. FACEBOOK ADS MANAGER**

We use Facebook (Meta Platforms Ireland Ltd.) tools for marketing purposes. Facebook may use cookies, web beacons, and identifiers (e.g. IPs, device IDs) to measure and target ads. Transfers outside the EEA rely on the EU-US Data Privacy Framework or SCCs. Users can disable targeted ads at <http://www.aboutads.info/choices> or <http://www.youronlinechoices.eu>.

#### **5. TECHNICAL MEASURES**

We apply necessary technical and organizational measures to secure your data, including SSL encryption and database protection. Subcontractors are verified for reliability and data protection practices.

#### **6. RECIPIENTS OF YOUR DATA**

We may share your data with authorized employees, processors acting on our behalf (IT, hosting, analytics, marketing providers), independent controllers (business partners), or public authorities when required by law.

#### **7. DATA RETENTION PERIOD**

Data collected via inquiries are retained until a response is provided and for a limitation period of potential claims. Data based on consent are processed until withdrawal. Data based on legitimate interest are retained until objection or purpose completion. Cookie retention details are available in the Website's cookie management tool.

#### **8. YOUR RIGHTS**

You have the right to access, rectify, delete, restrict, and transfer your data. You may withdraw consent at any time. You can object to processing based on legitimate interest. You may lodge a complaint with the President of the Personal Data Protection Office (UODO) in Poland.

Consent for cookies can be withdrawn in the Website's cookie management tool. Other rights can be exercised by emailing [info@wow-garden.pl](mailto:info@wow-garden.pl). We respond within 30 days, with possible extensions for complex cases. Identity verification may be required.

## **9. CHANGES TO OUR PRIVACY POLICY**

We aim to provide the highest level of data protection. Technological developments or service changes may result in updates to this Policy.

## **10. QUESTIONS AND CONCERNS**

Questions regarding this Privacy Policy can be sent to: [info@wow-garden.pl](mailto:info@wow-garden.pl)