

## Privacy Policy General

### Provisions:

1. The administrator of the users' personal data is Eco-Masuria Invest spółka z ograniczoną odpowiedzialnością, based in Frombork, 42 Elbląska Street, registered in the Register of Entrepreneurs of the National Court Register under KRS number: 0000833849, NIP: 6312690590, REGON: 385786077 (hereinafter referred to as the Website).
2. This Privacy Policy sets out the rules for the processing of personal data obtained through the [www.narusa.pl](http://www.narusa.pl) website, hereinafter referred to as the Website, and also constitutes an information clause regarding the processing of personal data by the Website as part of its online sales activities.
3. RODO is Regulation (EU) 2016/679 of the European Parliament and of the Council April 27, 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 (General Data Protection Regulation). The RODO sets out the principles for the processing of your personal data that the Service applies.
4. The service has appointed a Data Protection Officer who can be contacted at at the e-mail address [iod@narusa.pl](mailto:iod@narusa.pl). The Data Protection Officer can be contacted on all matters concerning the processing of personal data and the exercise of rights related to data processing.

### Use of the Website and mobile application:

5. The Website takes special care to respect the privacy of users who use the Website's services.
6. The use of the Service and registration of a user account in the Application are described in the Terms of Service, available at [www.narusa.pl/](http://www.narusa.pl/).
7. In connection with the user's use of the Website and the mobile application, the Website collects data to the extent necessary to provide the various services offered, as well as information about the user's activity. Detailed rules and purposes of processing personal data collected during the user's use of the Service are described below.
8. The Service collects information about how you use the Service by users (including IP address or other identifiers and information collected through cookies or other similar technologies). This information is used:
  - a. in order to provide electronic services in the field of making available users of the content collected on the Website, in which case the legal basis for the processing is the necessity of the processing for the performance of the contract,
  - b. for analytical and statistical purposes, in which case the legal basis of the processing is the legitimate interest of the Service, consisting of on conducting analysis of users' activities, as well as their preferences in order to improve the functionalities used and services provided;
  - c. for the purpose of marketing the products and services provided by the Website and for the purpose of presenting relevant offers, advertising and promotions, including through profiling to determine preferences or

user's needs - and the basis for data processing is the legitimate interests of the Service.

9. User activity on the Website, including his/her personal data, is recorded in system logs. The information collected in the logs is processed primarily for purposes related to the provision of services. The Service processes them also for technical, administrative purposes, for the purpose of ensuring the security of the IT system and the management of this system, as well as for analytical and statistical purposes - in this regard, the legal basis for processing is the Service's legitimate interest.
10. The service processes user data provided in the contact form in order to respond to reported inquiries, and the data will be processed on the basis of the consent given process the data for the purpose of responding, as well as on the basis of the legitimate interest of communicating with the user, to handle the user's inquiry, and for analytical purposes and statistical (keeping statistics of queries submitted by users in order to improve the functionality of the Website and to defend against possible claims. Data provided in the contact form, will be processed for the period necessary to respond to your inquiry, for no longer than 6 months from the date of last contact, unless longer processing is necessary to defend against possible claims.
11. The data provided when signing up for the newsletter (e-mail address) is used for the purpose of sending the newsletter, and the legal basis for its processing is the consent given by providing an e-mail address for this purpose. The data will be processed for the duration of the newsletter, the user opts out of receiving it beforehand. Opting out of receiving the newsletter However, it does not lead to deletion of the data from the database. The data will continue to be stored in the mailing system for the purpose of defending against possible claims related to the sending of the newsletter, in particular for the purpose of proving the granting of consent to receive the newsletter, which is a legitimate interest of the Service.
12. Provision of personal data for the purpose of sending newsletters and those provided in the contact form is voluntary and is not necessary for the conclusion and performance of contracts  
With the Service.
13. If you post any personal information of others (including their , address, phone number or e-mail address) on the Service, you may do so only on the condition that you do not violate the law or the personal rights of such persons.
14. Information collected by the Service in connection with the use of the Service may be processed by automated means, including profiling, however it will not have any legal effect users or affect it any way. In particular, automated processing, profiling and any other processing of data for statistical purposes will be done on the basis of anonymized data.
15. The service may transfer your data to suppliers based in in a third country in connection the use of tools used for statistical, reporting and advertising purposes that store personal data on servers located in third countries, particularly in the United States. Providers of these tools guarantee an adequate level of personal data protection

through the relevant compliance mechanisms provided by the RODO, in particular, through the use of standard contractual clauses approved by the European Commission, the application of binding corporate rules approved by the competent supervisory authority, or cooperation only with processors of Personal Data in the States, for which a relevant decision has been issued by the European Commission regarding the determination of the assurance of an adequate level of protection of personal data (including for the US 10.07.2023). The providers of these tools do not use the collected data to identify you or combine this information to enable identification.

16. For the rest of the Service's data processing rules, see below.

**Provision of electronic sales services:**

17. The service processes the following categories of personal data: name, country of citizenship, residential address, telephone number, e-mail address, visit history at [www.narusa.pl](http://www.narusa.pl).

18. Your data will be processed for:

- a. To conclude and execute a contract of lease or sale of products purchased electronically and to provide services electronically, including through access to the Mobile Application, to present the offer of the Online Store, and the legal basis for processing is the necessity of data processing to perform the contract;
- b. realization of the legitimate interest of the Service, consisting :
  - i. To establish and assert claims or defend against claims,
  - ii. increase the safety of users, reduce the potential costs of non-compliant use of the Service,
  - iii. to protect the Service from abuse, to verify the user's identity and the user's authorization to enter into transactions.
  - iv. Examining the quality of services provided by the Service, by contacting for this purpose by email or telephone with the user and the data contained in the reviews posted by the user,
  - v. to conduct marketing for products and services provided by the Service and to provide relevant offerings, including through profiling to determine preferences or needs Users;
  - vi. Conducting analysis and reports for statistical purposes.
- c. To comply with legal obligations imposed on the Service, in particular tax regulations, accounting regulations regarding the storage of tax and accounting documents;
- d. user consent to partially automate the user verification process in the process of creating a user account.

19. Data retention period:

- a. Personal data will be processed for the duration of the contract, Until the deletion of the account on the site. The storage period of personal data may be extended each time by the period of the statute of limitations for claims, if the processing of personal data will be necessary to pursue possible claims or to defend against such claims  
By Service;
  - b. In the case of data processing on the basis of legitimate interest for marketing purposes - the data will be processed for the period of existence of the Service's legitimate interest, but no longer than 3 years from the last marketing contact, you object to processing for marketing purposes;
  - c. In the case of data processing due to legal obligations incumbent on the On the Service - until the expiration of the obligation to store data under the law;
  - d. In the case of service quality testing, data will be processed for this purpose for no longer than 1 month after the user completes the last transaction.
20. Provision of personal data is voluntary, but necessary for the conclusion and performance of agreements linking the user with the Service. Provision of personal data for marketing purposes is voluntary and is not necessary for the conclusion and performance of agreements with the Service.
21. The user has the right to file a complaint to the supervisory authority, i.e. the President of the Office for Personal Data Protection.
22. The user has the right to access the content of the data and to rectify, erase or restrict processing, as well as the right to object, to request the cessation of processing and the right to data portability. The above rights can be exercised by reporting to the Data Protection Officer.
23. If the basis for the processing of your data is your consent, you may withdraw your consent at any time, but this will not affect on the legality of the processing carried out on the basis of consent before its withdrawal. Consent can be withdrawn by contacting the Data Protection Officer.
24. User data may be made available to entities processing personal data on behalf of the Service, i.e. entities providing services to the Service, primarily related to customer service (including the technical hotline and technical department), reservation processing, debt collection, marketing activities, public relations, a cashless payment operator cooperating with the Service for the purpose of payment processing, and Eco-Masuria Invest sp. z o.o. in case of consent to process data for marketing purposes by this entity.