

Privacy policy

globuslighting.com & globuslighting.pl

Definitions

Administrator - GL Sp. z o. o. based in Wrocław.

Mobile application - any software owned by GL Sp. z o. o., intended for installation on mobile devices, which enables the use of GL Sp. z o. o. or the Website.

Personal data - all information about a natural person identified or identifiable by one or more specific factors determining physical, physiological, genetic, mental, economic, cultural or social identity, including device IP, location data, online ID and information collected via cookies and other similar technology.

Policy - this Privacy Policy.

GDPR - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC.

Website - a website run by the Administrator at globuslighting.com and globuslighting.pl

User – any natural person visiting the Website or using one or more services or functionalities described in the Policy, including via Mobile Applications.

Data processing in connection with the use of the website

In connection with the User's use of the Website, the Administrator collects data to the extent necessary to provide individual services offered, as well as information about the User's activity on the Website. The detailed rules and purposes of processing personal data collected when using the Website by the User are described below.

Purposes and legal grounds for data processing on the website

Using the globuslighting.com/.pl website

- 1. Personal data of all persons using the Website (including IP address or other identifiers and information collected via cookies or other similar technologies) who are not registered Users (i.e. people who do not have a profile on the Website) are processed by the Administrator:
- 1.1 in order to provide services electronically in the scope of making content collected on the Website available to Users, providing contact forms then the legal basis for processing is the necessity of processing to perform the contract (Article 6(1)(b) of the GDPR);
- 1.2 for analytical and statistical purposes then the legal basis for processing is the Administrator's legitimate interest (Article 6(1)(f) of the GDPR) consisting in conducting analyzes of Users' activity, as well as their preferences in order to improve the functionalities and services provided; 1.3 in order to possibly establish and pursue claims or defend against them the legal basis for processing is the Administrator's legitimate

interest (Article 6(1)(f) of the GDPR) consisting in the protection of his rights;

2. The User's activity on the Website, including his personal data, is recorded in system logs (a special computer program used to store a chronological record containing information about events and activities regarding the IT system used to provide services by the Administrator). The information collected in the logs is processed in connection with the provision of services. The administrator also processes them for technical purposes, in particular, data may be temporarily stored and processed to ensure the security and proper functioning of IT systems, e.g. in connection with making backup copies, testing changes in IT systems, detecting irregularities or protecting against abuse and attacks .

Contact forms

- 1. The administrator provides the possibility of contacting him using electronic contact forms. Using the form requires providing personal data necessary to contact the User and answer the inquiry. The user may also provide other data to facilitate contact or handling the inquiry. Providing data marked as mandatory is required in order to accept and handle the inquiry, and failure to provide them results in the inability to service. Providing other data is voluntary.
- 2. Personal data is processed:
- 2.1 in order to identify the sender and handle his inquiry sent via the provided form the legal basis for processing is the necessity of processing to perform the contract for the provision of the service (Article 6(1)(b) of the GDPR);
- 2.2 for analytical and statistical purposes the legal basis for processing is the Administrator's legitimate interest (Article 6(1)(f) of the GDPR) consisting in keeping statistics of inquiries submitted by Users via the Website in order to improve its functionality;

Marketing

1. The Administrator processes Users' personal data in order to carry out marketing activities, which may consist of:

- 1.1 displaying marketing content to the User that are not adapted to his preferences (contextual advertising);
- 1.2 displaying marketing content to the User that corresponds to his interests (behavioral advertising);
- 1.3 sending e-mail notifications about interesting offers or content, which in some cases contain commercial information;
- 1.4 conducting other types of activities related to direct marketing of goods and services (sending commercial information by electronic means and telemarketing activities).
- 2 In order to carry out marketing activities, the Administrator uses profiling in some cases. This means that thanks to automatic data processing, the Administrator assesses selected factors concerning natural persons in order to analyze their behavior or create a forecast for the future.
- 3 In some cases, the Administrator runs advertising campaigns using the services of external providers, which may consist in displaying advertisements to non-standard groups of recipients on other websites or applications, including social networking sites.

Contextual advertising

The Administrator processes Users' personal data for marketing purposes in connection with targeting Users with contextual advertising (i.e. advertising that does not match the User's preferences). The processing of personal data then takes place in connection with the implementation of the Administrator's legitimate interest (Article 6(1)(f) of the GDPR).

Behavioral advertising

The Administrator processes Users' personal data, including personal data collected via cookies and other similar technologies, for marketing purposes in connection with targeting Users with behavioral advertising (i.e. advertising that is tailored to the User's preferences). The processing of personal data then also includes the profiling of Users. The use of personal data collected through this technology for marketing purposes, in particular in the field of promoting services and goods of third parties,

is based on the legitimate interest of the administrator and only on the condition that the User has consented to the use of cookies or similar technologies. Consent to the use of these files can be expressed by setting your preferences in the "Customize consents" tab on the Website or in the settings of the Mobile Application. This consent may be withdrawn at any time.

Newsletter

- 1. The administrator provides the newsletter service to persons who have provided their e-mail address for this purpose. Providing data is required in order to provide the newsletter service, and failure to provide them results in the inability to send it. This form of communication with the User may include profiling.
- 2. Personal data is processed:
- 2.1 in order to provide the newsletter service the legal basis for processing is the necessity of processing to perform the contract (Article 6(1)(b) of the GDPR);
- 2.2 in the case of sending marketing content to the User as part of the newsletter the legal basis for processing, including using profiling, is the Administrator's legitimate interest (Article 6(1)(f) of the GDPR) in connection with the consent given to receive the newsletter;
- 2.3 for analytical and statistical purposes the legal basis for processing is the Administrator's legitimate interest (Article 6(1)(f) of the GDPR), consisting in conducting analyzes of Users' activity on the Website in order to improve the functionalities used;
- 2.4 in order to possibly establish and pursue claims or defend against claims the legal basis for processing is the legitimate interest of the Administrator (Article 6(1)(f) of the GDPR), consisting in the protection of its rights.

Direct marketing

If the User has agreed to receive marketing information via e-mail, SMS and other means of electronic communication, the User's personal data will be processed for the purpose of sending such information. The basis for data processing is the legitimate interest of GL Sp. z o. o. consisting in sending marketing information within the limits of the consent given by the User (direct marketing). The user has the right to object to the processing of data for the purposes of direct marketing, including profiling. The data will be stored for this purpose for the duration of the legitimate interest of GL Sp. z o.o., unless the User objects to receiving marketing information.

Social media

The Administrator processes the personal data of Users visiting the Administrator's profiles in social media (Facebook, YouTube, Instagram, Twitter, Google +, Pinterest). These data are processed only in connection with maintaining a profile, including to inform Users about the Administrator's activity and to promote various types of events, services and products, as well as for communication purposes. with users through functionalities available in social media endurable. The legal basis for the processing of personal data by the Administrator for this purpose is its legitimate interest (Article 6(1)(f) of the GDPR) consisting in promoting its own brand and building and maintaining a community associated with the brand.

Data processing in connection with the use of Mobile Applications

1. The Administrator processes Users' personal data also in order to enable the use of services offered on the Website, as well as additional

services via Mobile Applications. In connection with the User's downloading and use of Mobile Applications, the Administrator may process technical data regarding the device on which the given application is installed, User's identification and contact data, data regarding activity in the application, including data on the scope and manner of using its functionality, location and payment details.

- 2. Users' data in connection with the use of Mobile Applications are processed:
- 2.1 for registration and use of mobile applications. The legal basis for data processing in this respect is the necessity to perform the contract (Article 6(1)(b) of the GDPR);
- 2.2 in order to provide services available via mobile applications the legal basis for processing is the necessity of processing to perform the contract (Article 6(1)(b) of the GDPR);
- 2.3 in order to possibly establish and pursue claims or defend against them the legal basis for processing is the Administrator's legitimate interest (Article 6(1)(f) of the GDPR) consisting in the protection of his rights;
- 2.4 for analytical and statistical purposes the legal basis for processing is the Administrator's legitimate interest (Article 6(1)(f) of the GDPR) consisting in conducting analyzes of Users' activity, as well as their preferences in order to improve the functionalities and services provided; 2.5 for marketing purposes the legal basis for processing is the Administrator's legitimate interest (Article 6(1)(f) of the GDPR) consisting in the promotion of its products and services.
- 3 Using mobile applications, the User may in particular: browse the Website's assortment, access their account on the Website, place orders and make payments for them, read the information provided in the mobile application and use other functionalities and content available in the mobile application. The Administrator informs that due to technical limitations, the mobile application does not provide the possibility of using all the functionalities of the Website that are available through the Website.

Cookies and similar technology

Cookies are small text files installed on the User's device (computer, telephone, tablet, etc.) while browsing the website (hereinafter "Website"). Cookies collect various information about the User, including his personal data, in particular such as device IP, cookie ID, location data or online ID. There are three basic types of cookies:

1. session cookies: specific to a specific visit, limited to sending the so-called session identifier (a random string of numbers generated by the server) so that the User does not have to re-enter the same information after going to the next page of the Website or after leaving it completely. Session files are not permanently stored on the User's device and are deleted when the browser is closed;

2. persistent cookies: files that save information about the User's preferences, stored in the cache of the browser or mobile device;

Cookies have various purposes and are an important element that improves the quality, comfort and safety of using the Website, we use cookies that perform the following functions:

Technical cookies:

Technical cookies are used primarily to provide services provided electronically and are necessary for the proper functioning of the Website. Due to their nature, technical cookies do not require the user's consent and are always active. These are in particular:

- authentication cookies used for services requiring authentication for the duration of the session;
- cookies used to ensure security, e.g. used to detect fraud in the field of authentication;
- session cookies of multimedia players (e.g. flash player cookies), for the duration of the session;
- cookies for the technical delivery of advertisements and content;

• persistent cookies used to personalize the User's interface for the duration of the session or slightly longer.

Functional cookies:

Functional cookies allow for greater functionality and personalization of the Website. They enable e.g. remembering the Website functionalities preferred by the User. If you do not allow these cookies, some or all of these services may not function properly.

Analytical cookies:

Analytical cookies are used to research and improve the quality of services provided. These types of cookies collect information on how Users use the Website. For example, they allow us to count visits and traffic sources so that we can measure and improve the performance of the Website. They help to determine which pages are the most and least popular and to see how visitors move around the Website. If you do not allow these cookies, we will not know when you have visited our website.

Deleting cookies

You can delete cookies through your browser settings. Ways to configure cookie settings in individual browsers can be found e.g. at the addresses:

• Google Chrome:

https://support.google.com/chrome/bin/answer.py?hl=en&answer=9564

- Mozilla Firefox: https://support.mozilla.org/pl/kb/usuwanie-ciasteczek
- Microsoft Edge: https://support.microsoft.com/pl-pl/microsoft-edge/deleting-file%C3%B3w-cookie-w-przegl%C4%85darce-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09
- Opera: https://help.opera.com/pl/latest/web-preferences/
- Safari: https://support.apple.com/pl-pl/guide/safari/sfri11471/mac.

Analytical and marketing tools used by the administrator's partners

The Administrator and his Partners use various solutions and tools used for analytical and marketing purposes. Below is some basic information about these tools. Detailed information in this regard can be found in the privacy policy of a given partner.

Google Analytics

Google Analytics cookies are files used by Google to analyze how the User uses the Website, to create statistics and reports on the functioning of the Website. Google does not use the collected data to identify the User, nor does it combine this information to enable identification. Detailed information on the scope and principles of data collection in connection with this service can be found at the following link: https://google.com/intl/pl/policies/privacy/partners.

Google AdWords

Google AdWords is a tool that allows you to measure the effectiveness of advertising campaigns carried out by the Administrator, allowing you to analyze data such as keywords or the number of unique users. The Google Adwords platform also allows us to display our advertisements to people who have visited the Website in the past. Information on data processing by Google in the scope of the above service is available at the following link: https://policies.google.com/technologies/ads?hl=pl.

The period of personal data processing

- 1. The period of data processing by the Administrator depends on the type of service provided and the purpose of processing. As a rule, data is processed for the duration of the service or order execution, until the consent is withdrawn or an effective objection to data processing is submitted in cases where the legal basis for data processing is the Administrator's legitimate interest.
- 2. The period of data processing may be extended if the processing is necessary to establish and pursue any claims or defend against them, and after that time only if and to the extent required by law. After the end of the processing period, the data is irreversibly deleted or anonymized.

User permissions

- 1. Data subjects have the following rights:
- a) The right to information about the processing of personal data on this basis, the person submitting such a request, the Administrator provides information about the processing of personal data, including primarily the purposes and legal grounds for processing, the scope of data held, entities to which personal data are disclosed and the planned date their removal;
- b) The right to obtain a copy of the data on this basis, the Administrator provides a copy of the processed data concerning the person submitting the request;
- c) The right to rectification on this basis, the Administrator removes any inconsistencies or errors regarding the processed personal data and completes or updates them if they are incomplete or have changed;
- d) The right to delete data on this basis, you can request the removal of data whose processing is no longer necessary to achieve any of the purposes for which they were collected;
- e) The right to limit processing on this basis, the Administrator ceases to perform operations on personal data, with the exception of operations to which the data subject has consented and their storage, in accordance with the adopted retention rules, or until the reasons for limiting data processing cease to exist (e.g. a decision of the supervisory authority will be issued, allowing further data processing);

- f) The right to transfer data on this basis, to the extent in which the data is processed in connection with the concluded contract or consent, the Administrator issues the data provided by the person to whom they relate, in a format that allows them to be read by a computer. It is also possible to request that these data be sent to another entity provided, however, that there are technical possibilities in this respect both on the part of the Administrator and that other entity;
- g) The right to object to the processing of data for marketing purposes the data subject may object to the processing of personal data for marketing purposes at any time, without the need to justify such an objection;
- h) The right to object to the processing of data for purposes related to satisfaction surveys the data subject may at any time object to the processing of personal data for purposes related to satisfaction surveys, in particular to object to sending e-mails with a request for issuing an opinion (review) or completing a satisfaction survey, without the need to justify such an objection;
- i) 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 the Administrator's legitimate interest (e.g. for analytical or statistical purposes or for reasons related to the protection of property). The objection in this regard should contain a justification and is subject to the Administrator's assessment;
- j) The right to withdraw consent if the data is processed on the basis of consent, the data subject has the right to withdraw it at any time, which, however, does not affect the lawfulness of the processing carried out before the withdrawal of this consent;
- k) Right to complain if it is found that the processing of personal data violates the provisions of the GDPR or other provisions regarding the protection of personal data, the data subject may submit a complaint to the President of the Office for Personal Data Protection.
- 2. An application regarding the exercise of the rights of data subjects may be submitted:
- a) in writing to the address of GL Sp. z o.o., ul. Fabryczna 14 (53-609 Wrocław);
- b) by e-mail to the following address: gl@globuslighting.pl
- 3. The application should, if possible, precisely indicate what the request concerns, i.e. in particular:

- a) what right the person submitting the application wants to exercise (e.g. the right to receive a copy of the data, the right to delete data, etc.);
- b) what processing process the request concerns (e.g. using a specific service, activity on a specific website, receiving a newsletter containing commercial information to a specific email address, etc.);
- c) what processing purposes the request concerns (e.g. marketing purposes, analytical purposes, etc.).
- 4. If the Administrator is unable to determine the content of the request or identify the person submitting the request based on the submitted application, he will ask the applicant for additional information.
- 5. A response to applications will be provided within one month of its receipt. If it is necessary to extend this period, the Administrator will inform the applicant about the reasons for such extension.
- 6. The answer will be provided to the e-mail address from which the application was sent, and in the case of applications sent by letter, by regular mail to the address indicated by the applicant, unless the content of the letter indicates the desire to receive feedback to the e-mail address (in this case e-mail address must be provided).

Data recipients

- 1. In connection with the provision of services, personal data will be disclosed to external entities, including in particular suppliers responsible for servicing IT systems, entities running the Customer Support Centre, entities such as banks and payment operators, entities providing accounting, legal, auditing and consulting services, couriers (in connection with the execution of the order), marketing agencies (in the field of marketing services) and entities related to the Administrator, including companies from its capital group and business partners, i.e. entrepreneurs running GL Sp. z o.o.. In the event of a complaint, the User's data may be transferred to the product distributor, manufacturer or guarantor, depending on the specific product covered by the rights.
- 2. If the User's consent is obtained, his data may also be made available to other entities for their own purposes, including marketing purposes.
- 3. The Administrator reserves the right to disclose selected information about the User to competent authorities or third parties who submit a

request for such information, based on the appropriate legal basis and in accordance with the provisions of applicable law.

Data transfer outside the EEA

- 1. The level of protection of personal data outside the European Economic Area (EEA) differs from that provided by European law. For this reason, the Administrator transfers personal data outside the EEA only when it is necessary and with an appropriate level of protection, in particular by:
- 1. cooperation with entities processing personal data in countries for which an appropriate decision of the European Commission has been issued;
- 2. the use of standard contractual clauses issued by the European Commission;
- 3. application of binding corporate rules approved by the competent supervisory authority;

The administrator always informs about the intention to transfer personal data outside the EEA at the stage of their collection.

Security of personal data

- 1. The administrator conducts risk analysis on an ongoing basis to ensure that personal data is processed by him in a safe manner ensuring, above all, that only authorized persons have access to the data and only to the extent that it is necessary due to the performance of not the task. The administrator makes sure that all operations on personal data are registered and performed only by authorized employees and associates.
- 2. The Administrator takes all necessary actions to ensure that its subcontractors and other cooperating entities guarantee the application of appropriate security measures whenever they process personal data at the request of the Administrator.

Contact details

- 1. Contact with the Administrator is possible via the e-mail address: gl@globuslighting.pl
- 2. Correspondence address of GL Sp. z o.o., ul. Fabryczna 14 (53-609 Wrocław).

Changing the privacy policy

The policy is reviewed on an ongoing basis and updated if necessary.