



## **PRIVACY AND COOKIES POLICY OF 3LP S.A.**

Dear Readers,

the document you are reading at the moment is a proof that 3LP S.A. seriously treats your privacy and legal requirements which, in relation to its protection, are imposed on 3LP S.A. with provisions of law, in particular the 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 (General Data Protection Regulation) (hereinafter referred to as GDPR).

The goal of this Privacy and Cookies Policy of 3LP S.A. is providing you with necessary and legally required information regarding rules of processing your personal data and used cookies by 3LP S.A.

At the beginning we would like to focus on the Controller of personal data, i.e. the entity which specifies goals and decides on the manner of processing your personal data: 3LP Spółka Akcyjna [joint-stock company] with its seat in Siechnice, ul. E. Kwiatkowskiego 24, 55-011 Siechnice, entered into the register of entrepreneurs kept by the District Court for the Wrocław - Fabryczna, 9th Commercial Department of the National Court Register, under the number KRS0000616228, share capital: PLN 59,100,000.00 fully paid, NIP [Tax Identification Number]: 896-155-12-25, REGON [the National Official Register of Business Entities]: 364411238; hereinafter referred to as: 3LP S.A. In all issues regarding privacy, you may contact 3LP S.A. by sending an e-mail to [zarzad@3lp.eu](mailto:zarzad@3lp.eu).

### **I. GOALS, LEGAL GROUNDS OF PROCESSING, CATEGORIES OF YOUR PERSONAL DATA**

#### **1. CONCLUDING AND EXECUTING A CONTRACT**

3LP S.A. shall process your personal data in order to undertake, upon your request, actions leading to concluding a contract with 3LP S.A. or, when necessary, to execute the already concluded contract (**Article 6, section 1, letter b) of GDPR**).

In practice it is related to the possibility of:

1. concluding contracts with 3LP S.A., in particular contracts on provision of services,
2. sending 3LP S.A. reports/information via an e-mail or a contact form available at [www.3lp.eu](http://www.3lp.eu) website in relation to concluding or executing the contracts using the above-mentioned website,
3. concluding contracts with 3LP S.A. on provision of services electronically; services referred to in the Regulations of Providing Delivery Services by 3LP S.A. available at [www.3lp.eu](http://www.3lp.eu).

## 2. LEGAL DUTIES

3LP S.A. processes your personal data in order to fulfil a legal obligation on 3LP S.A. (**Article 6, section 1, letter c of GDPR**).

In practice, it means the necessity of processing your personal data in relation to fulfilling obligations resulting from the provisions of law, in particular duties resulting from tax provisions, Accountancy Act, acts in the scope of social insurance, Civil Code, and acts regarding consumer's rights.

## 3. LEGALLY JUSTIFIED INTEREST OF 3LP S.A. OR A THIRD PARTY

3LP S.A. may process your personal data in case it is necessary for purposes resulting from the justified interests carried out by 3LP S.A. or by third party (**Article 6, section 1, letter f of GDPR**).

In practice it is related to processing your data in the following cases:

- Managing relations with customers. 3LP S.A., for internal purposes, analyses current cooperation with you in order to develop analyses and statistics regarding the provided services. On the basis of the above-mentioned information 3LP S.A. obtains knowledge helpful in developing offers and improving the quality of provided services.
- Marketing of services offered by 3LP S.A.

3LP S.A. contacts you by phone or sends you marketing information regarding services offered by 3LP S.A., as long as you expressed your content for telephone contact or contact via e-mail or text messages, carried out for direct marketing purposes.

3LP S.A. does not send spam, i.e. undesired commercial information. 3LP S.A. does not transfer any personal data, in particular e-mail addresses or telephone numbers to third parties in order to allow them to undertake direct marketing actions regarding goods or services offered by those entities.

- Pursuing claims by 3LP S.A. and protection against claims directed to 3LP S.A.

In case you fail to comply with or improperly comply with the Contract concluded with 3LP S.A., 3LP S.A., as part of the applicable law, may pursue claims from you, e.g. demand payment for the performed services. In case you direct claims against 3LP S.A., 3LP S.A. shall process your personal data in order to protect themselves against such claims.

- Securing claims related to provision of services. In case of justified with the value contracts on provision of services by 3LP S.A.

concluded by you as an entrepreneur, in case 3LP S.A. grants you the possibility of deferring payment, 3LP S.A. may request you to issue or guarantee a blank promissory note or establishing a different protection in order to ensure sufficient execution of the contract with 3LP S.A. by you.

- Evaluating Creditworthiness

In case the conditions of the Contract concluded between you and 3LP S.A. include deferred payment, 3LP S.A. collects and stores information about you regarding financial situation, allowing for evaluating your financial situation and analysing risk related to concluding a contract with you.

- Contacting 3LP S.A.

3LP S.A. allows you to send to 3LP S.A. a written report to the 3LP S.A.'s address, via e-mail or contact form available at [www.3lp.eu](http://www.3lp.eu).

- Storing data in order to ensure accountability, i.e. proving following the regulations regarding processing personal data.

## **II. RECIPIENT OF PERSONAL DATA**

In relation to processing your personal data for purposes referred to in part 1 of the Privacy Policy of 3LP S.A. (above), 3LP S.A. may share your data with the following recipients or categories of recipients:

- Entities providing shipping services (couriers), entities providing postal services, economic information bureaus, entities providing services of sharing economic reports of companies, banks where 3LP S.A. hold a bank account, entities providing 3LP S.A. with documents archiving services, services of auditing Financial Statements, accounting services, tax, financial, business, and legal consultancy, IT services, entities which 3LP S.A. commissions executing debt-collection operations and attorneys-at-law representing 3LP S.A.

## **III. PLANNED PERIOD OF STORING DATA**

The personal data are stored for the period necessary to fulfil goals indicate in part 1 of the Privacy and Cookies Policy of 3LP S.A. (above).

- In case of data processed in order to conclude and execute a contract, 3LP S.A. processes personal data until the civil law claims resulting from them expire.
- In case of data processed in order to fulfil a legal obligation - the period of processing data results from the provisions of law.

- In case of data processed in order to execute justified interest of 3LP S.A. or third party - the period of storing personal data differs depending on the detailed purpose of processing.
  - ✓ In case of processing data in order to manage relations with customers, 3LP S.A. processes personal data collected for this purpose for the indefinite period of time or by the moment you submit an objection pursuant to Article 21, section 1 of GDPR due to your particular situation.
  - ✓ In case of processing personal data for the purpose of marketing services provided by 3LP S.A., 3LP S.A. processes personal data collected for this purpose by the time you withdraw your consent for sending you commercial information using e-mails, text messages, or making phone calls.
  - ✓ In case of processing personal data for purposes of pursuing claims by 3LP S.A. or in order to protect themselves from claims against 3LP S.A., 3LP S.A. processes personal data for this purpose by the time the pursued claim is executed or the claim expires, whichever occurs earlier.
  - ✓ In case of processing personal data for the purpose of securing claims related to provision of services by 3LP S.A., 3LP S.A. processes personal data for indefinite time, as long as you remain in business relations with 3LP S.A., there are unsatisfied claims of 3LP S.A. against you.
  - ✓ In case of processing personal data for purposes of accountability, 3LP S.A. processes personal data for the period necessary to document fulfilment of legal requirements and allow controls of their fulfilment by the authorised public bodies.

#### **IV. RIGHTS OF THE PERSON PERSONAL DATA REFER TO**

##### **1. RIGHT TO ACCESS DATA**

You have the right to access your data, obtain a copy of your data, also electronically.

##### **2. RIGHT TO CORRECT DATA**

You have right to demand correcting the above-mentioned incorrect personal data. You have right to demand completing the above-mentioned incomplete personal data.

##### **3. RIGHT TO DELETE DATA**

You have right to demand from 3LP S.A. deleting personal data in the following cases:

- ✓ when data are not necessary for purposes they were collected for or processed otherwise,
- ✓ when you file an objection due to your particular situation against processing personal data by 3LP S.A. on the basis of a premiss of legally justified purpose of 3LP S.A. or third party and there are no superior legally justified grounds for processing,

- ✓ when you submit an objection against processing your data for purposes of direct marketing,
- ✓ when your personal data were processed illegally,
- ✓ personal data have to be deleted for the purpose of fulfilling the legal obligation under the EU law or under Polish law applicable to 3LP S.A.

3LP S.A. draws your attention to the fact that this law is subject to significant limitations.

3LP S.A. will not be able to fulfil your request in case further processing is necessary to:

- ✓ fulfil by 3LP S.A. the legal obligation requiring processing subject to the EU or national law (e.g. the tax obligations related to the contract concluded between you and 3LP S.A. have not expired, the period of obligatory storing of accounting documents issued in relation to the contract concluded between 3LP S.A. and you has not expired),
- ✓ establish, pursue, or protect against claims.

#### **4. RIGHT TO LIMIT PROCESSING**

You have right to demand limiting processing in case:

- ✓ you question the correctness of your personal data - for the period allowing 3LP S.A. to check the correctness of such data;
- ✓ processing of data is illegal and you object deleting personal data demanding limiting their processing, instead;
- ✓ 3LP S.A. does not need personal data any more for the purpose of processing them but you need them to settle, pursue, or protect claims;
- ✓ you file an objection due to your particular situation against processing personal data by 3LP S.A. on the basis of a premiss of legally justified purpose of 3LP S.A. or third party - by the time it is stated whether the legally justified grounds on the 3LP S.A.'s side are superior against the grounds of the objection submitted by you.

#### **5. RIGHT TO TRANSFER DATA**

You have right to receive data provided by you which 3LP S.A. processes in an automated manner pursuant to the contract concluded with you, in the form of a file in the commonly used format readable by computer software. You also have right to demand sending the above-mentioned file to a different data Controller, if it is technically possible.

#### **6. RIGHT TO OBJECT**

- You have right at any time to file an objection - due to your particular situation - against processing of your personal data, based on legally justified aim of 3LP S.A. or a third party. 3LP S.A. has right to refuse stopping processing your data in case it presents:

- ✓ the existence of significant legally justified grounds for processing, superior against your interest or rights and freedoms, or
  - ✓ existence of grounds to establish, pursue, or protect claims.
- You have right at any time to file an objection in case 3LP S.A. processes your data for direct marketing purposes.

## **V. CLAIM TO A SUPERVISING BODY**

You have right to file a claim to a supervising body, i.e.: the President of the Personal Data Protection Office.

## **VI. VOLUNTARY PROVISION OF DATA**

1. You may browse [www.3lp.eu](http://www.3lp.eu) website without the necessity of providing your personal data.
2. In case you plan to conclude a contract with 3LP S.A. via a website, not providing personal data required in a given situation may prevent you from contacting 3LP S.A.

## **VII. SOURCES OF OBTAINING DATA**

1. 3LP S.A. obtains your personal data directly from you, subject to provisions of the Privacy and Cookies Policy of 3LP S.A., in particular section 2, point VIII below.
2. In case you are an entrepreneur who makes deferred payments for 3LP S.A., 3LP S.A. may collect information about you using economic information bureau, in conformity with the Act of 09.04.2010 on giving access to business information and business data exchange. Moreover, 3LP S.A. collects from entities providing services of sharing business reports on companies, information on your creditworthiness, especially on-time payment of liabilities towards other business entities, e.g. payment history, value of liabilities, payment structure, history of late payments, and average delay. 3LP S.A. obtains the above-mentioned information from the following entities: Krajowy Rejestr Długów Biuro Informacji Gospodarczej S.A., ul. Danuty Siedzikówny 12, 51-214 Wrocław, BISNODE Polska Sp. z o.o., Plac Europejski 2, 00-844 Warszawa, Coface Poland Credit Management Services Sp. z o.o., Aleje Jerozolimskie 142A, 02-305 Warszawa, EULER HERMES COLLECTIONS Sp. z o.o., Aleje Jerozolimskie 98, 00-807 Warszawa.

## **VIII. COOKIES POLICY**

1. When you use [www.3lp.eu](http://www.3lp.eu) website your data are collected automatically. Those data include: IP address, domain name, type of browser, and type of operating system. Those data may be collected by cookies, Google Analytics system, and may be saved on the server's logs.
2. Cookies referred to in point 1 are files sent to computer, smartphone or other device you use to browse [www.3lp.eu](http://www.3lp.eu) website. Cookies save user's preferences which allows

improving the quality of provided services, search results, and relevance of displayed information, as well as following user's preferences.

3. 3LP S.A. uses types of cookies mentioned above (unless specified otherwise):
  - Necessary cookies - files of crucial importance, allowing users to move around [www.3lp.eu](http://www.3lp.eu) website and use its functions. Without these cookies, [www.3lp.eu](http://www.3lp.eu) website may not be displayed correctly. These are cookie files of the users - unique identifiers appointed to each user, used for identifying them when visiting [www.3lp.eu](http://www.3lp.eu) website and coming back to the website.
  - Performance cookies - collecting information about how the users use [www.3lp.eu](http://www.3lp.eu), which part of the above-mentioned website are visited most frequently, and if they receive notifications about errors from the website. Data collected by those cookies are anonymous and are to improve the functioning of [www.3lp.eu](http://www.3lp.eu).
  - Functional cookies - registering choices made by users (such as user's name, language, or region) Those files may also use to save changes made by the user, e.g. changes of text size and font, as well as other parts of the above-mentioned website which may be edited. Information collected by cookies may be used by the User in order to identify behaviours of the users and sharing content).
4. Consent to store and obtain access to cookies by 3LP S.A. on your device is expressed by you using settings of your web browser installed on your device. If you want to clear the existing cookies from your device, you can do it using an option on your browser, software dedicated to it or specific tools available as part of the operating system you use.
5. Information on the ways of clearing the cookies in the most popular web browsers can be found under the following links:
  - Firefox: <http://support.mozilla.org/pl/kb/usuwanie-ciasteczek>,
  - Opera: <http://help.opera.com/Linux/9.60/pl/cookies.html>,
  - Internet Explorer: <http://support.microsoft.com/kb/278835/pl>,
  - EDGE <https://www.microsoft.com/pl-pl/edge> ,
  - Chrome: <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>
  - Safari: [http://support.apple.com/kb/HT1677?viewlocale=pl\\_PL](http://support.apple.com/kb/HT1677?viewlocale=pl_PL)
6. 3LP S.A. informs you that changes in configurations of a web browser which prevents or limits storing cookie files on your end device may cause limitations of functionalities of the provided services. Similar results may be caused by clearing cookies during the provision of services.
7. On [www.3lp.eu](http://www.3lp.eu) 3LP S.A. uses Google Analytics referred to on point 1 above, service of analysing traffic on websites shared by Google, Inc., hereinafter referred to as "Google".
8. Google Analytics uses cookies in order to allow 3LP S.A. analyse the way users use [www.3lp.eu](http://www.3lp.eu) website. Information generated by cookies regarding your usage of [www.3lp.eu](http://www.3lp.eu) website shall be transferred to Google.
9. Google shall use those information in order to evaluate using [www.3lp.eu](http://www.3lp.eu) by the user, including you, developing reports regarding the traffic on the website for websites



operators and providing other services related to traffic on websites and using the internet.

10. Google may also transfer such information to third parties if it is obliged to do so pursuant to provisions of law or in case the parties process such information on behalf of Google.
11. You may switch off Google Analytics by installing a free add-ons to a browser blocking Google Analytics, which is available here: <https://tools.google.com/dlpage/gaoptout?hl=pl>.

## **IX. PROTECTING PERSONAL DATA**

3LP S.A. uses technical and organisational means securing personal data against sharing them with unauthorised parties, losing or damaging them, appropriate for a discovered risk related to processing data.

## **X. FINAL PROVISIONS**

1. Any additional questions and information related to the Privacy and Cookies Policy of 3LP S.A. should be sent to following e-mail address: [zarzad@3lp.eu](mailto:zarzad@3lp.eu).
2. The Privacy and Cookies Policy of 3LP S.A. shall be effective from 01.02.2021.