



# PRIVACY POLICY

## 1. WHO IS WHO IN THE PRIVACY POLICY?

We, the **Lood Is Good Spółka z ograniczoną odpowiedzialnością**, with its registered office in Kraków, Radzikowskiego 35, 31-315 Kraków.

You, that is our **Guest** - a natural person whose personal data is processed for at least one purpose specified in the Privacy Policy.

## 2. WHAT IS THE PURPOSE OF THIS PRIVACY POLICY?

We attach great importance to the protection of your privacy and your personal data. When processing your personal data, we make sure that they are safe. The Privacy Policy explains how we use your personal data in connection with:

- your participation in the 'Good Lood' Loyalty Programme (to create and maintain your User Account). It is available on the Programme website <https://goodlood.com/app>.
- fulfillment of orders and deliveries of our products with the use of the Good Lood App Mobile Application on the basis of the Good Lood Delivery Terms and Conditions.
- fulfillment of orders and deliveries of our products with the use of the website <https://goodlood.com/delivery>.
- as well as by providing answers to questions, claims, complaints and suggestions. You will also find information about the rights you hold in connection with the fact that we process your personal data, as well as how you can use these rights.

## 3. WHO IS YOUR PERSONAL DATA ADMINISTRATOR AND WHAT ARE ITS CONTACT DETAILS?

The administrator of your personal data is Lood Is Good Spółka z ograniczoną odpowiedzialnością with registered office in Kraków, Radzikowskiego 35, 31-315 Kraków., entered into the register of entrepreneurs kept by the District Court

for Kraków-Śródmieście in Kraków, XI Commercial Division of the National Court Register under KRS number 0000603176. Our contact details: ul. Radzikowskiego 35, 31-315 Kraków, email: [privacy@goodlood.com](mailto:privacy@goodlood.com).

We have appointed an **Inspector for Personal Data Protection** who can be contacted on all matters related to the processing of your personal data and in order to use the rights pertaining to the processing of your personal data. To contact the Inspector for Personal Data Protection:

- email us at: [privacy@goodlood.com](mailto:privacy@goodlood.com).
- send us a letter (preferably with a note: 'Inspector for Personal Data Protection') to **Lood Is Good Sp. z o.o. ul. Radzikowskiego 35, 31-315 Kraków**.

#### **4. WHAT PERSONAL DATA DO WE PROCESS AND WHERE DO WE GET IT FROM? FOR WHAT PURPOSE DO WE PROCESS YOUR PERSONAL DATA AND ON WHAT BASIS**

##### **User Account maintenance:**

- If you decide to create a User Account in our Programme to fulfill the agreement pertaining to your participation in the 'Good Lood' Loyalty Programme as well as to create and maintain your User Account, we will process your personal data specified in the registration form, such as: name, phone number.
- The legal basis for the processing of the above-mentioned data is the fulfillment of the agreement of the 'Good Lood' Loyalty Programme and the creation and maintenance of the User Account as well as taking action on your request (Article 6 (1) (b) GDPR). In addition, the possibility of the processing of personal data is confirmed by the acceptance of the Terms and Conditions of the 'Good Lood' Loyalty Programme.

##### **Support for the collection of rewards using a Mobile Application in the 'Good Lood' Loyalty Programme:**

- In order to collect rewards using the mobile application Good Lood App, we will process information connected with the collection of awards: your personal data specified in the registration form, such as name and phone number as well as indicated at a later stage, such as date of birth, and those associated with the mobile application Good Lood App, such as QR-codes and their validity.
- The legal basis for the processing of the above-mentioned data is the necessity to fulfill the part of the agreement concerning the collection of rewards and taking action at your request (Article 6 (1) (b) GDPR). In addition, the possibility

of the processing of personal data is confirmed by the acceptance of the Terms and Conditions of the 'Good Lood' Loyalty Programme.

#### **Fulfillment of product orders and deliveries using the Mobile Application:**

- In order to process orders and deliver products using the Good Lood App, we will process your personal data provided in the registration forms: name, surname, telephone number e-mail address, and alternatively the NIP (taxpayer identification number) of the person who orders; the order forms: name, surname, telephone number and e-mail address of the person who receives the product; and information shared for the purposes of submitting any remarks when ordering; as well as the data necessary to process your payment using the payment methods available in the Good Lood App (such as payment card, BLIK and others in the future). Additionally, we will process the automatically gathered analytical data. In case of your consent, we will also process your personal data for the purpose of processing subsequent orders and payments. Data relating to payment instruments (including payment cards) will be processed by a payment service provider (payment institution) with the appropriate authorisation required by law.
- The legal basis for our processing of the aforementioned data is the necessity for the fulfillment of the agreement concluded as a result of the acceptance of your order placed with the Good Lood App and for payment for the order placed (Article 6 (1) (b) GDPR). We may process the aforementioned personal data for the purpose of processing subsequent orders on the basis of your consent (Article 6 (1) (a) GDPR).

#### **Fulfillment of product orders and deliveries using the website**

**<https://goodlood.com/delivery>.**

- In order to process orders and the delivery of products using the website <https://goodlood.com/delivery>, we will process your personal data provided on the website concerning the placement and fulfillment of the order: contact details such as name, surname, telephone number, e-mail address, and alternatively the NIP (taxpayer identification number) of the person who orders; product delivery place; name, surname, telephone number and e-mail address of the person who receives the product; and information shared for the purposes of submitting any remarks when ordering; data regarding the internet connection; as well as the data necessary to process your payment using the payment methods available in the Good Lood App (such as

payment card, BLIK and others in the future). Additionally, we will process the automatically gathered analytical data. In case of your consent, we will also process your personal data for the purpose of processing subsequent orders and payments. Data relating to payment instruments (including payment cards) will be processed by a payment service provider (payment institution) with the appropriate authorisation required by law.

- The legal basis for our processing of the aforementioned data is the necessity for the fulfillment of the agreement concluded as a result of the acceptance of your order placed with the website <https://goodlood.com/delivery> and for payment for the order placed (Article 6 (1) (b) GDPR). We may process the aforementioned personal data for the purpose of processing subsequent orders on the basis of your consent (Article 6 (1) (a) GDPR).

#### **Performance of legal obligations:**

- For the purposes of fulfilling the obligations imposed on us by law, e.g. the Accounting Act or tax legislation (e.g. the storage of accounting documents) we will process the data from your User Account as well as information related to claims and complaints, such as: your name, postal or email address if they are specified by you in your communication with us.
- The legal basis for the processing of the above-mentioned data is the legal obligation incumbent upon us pursuant to Article 6 (1) (c) GDPR.

#### **Survey of the preferences and behaviours, creation of your profile for marketing purposes (profiling), and direct marketing:**

- Preference survey and profile creation for marketing purposes: To find out your personal preferences and behaviours in order to provide you with information about products, news and discounts offered by us that we believe may be of interest to you and meet your needs, we will create your guest profile (profiling). To create it, we will process your personal data specified in the registration form of the 'Good Lood' Loyalty Programme and your User Account, information related to your activities within the User Account in the last 24 months, information gathered as part of the process of fulfillment of orders placed in the Application (order history, information about the points awarded and used, and rewards redeemed), the frequency and way of using your User Account (i.e. through the Mobile Application / programme website), as well as data regarding orders placed on the website <https://goodlood.com/delivery>; your feedback, cookies and related technologies for collecting user activity

data, i.e. places visited and your activities on our sites, technical information about your device (IP / MAC address, operating system and browser type).

- Direct marketing: For direct marketing purposes, i.e. to inform you about products, news and our promotional campaigns, we will process your profile data, as well as any information provided during ordering on the website <https://goodlood.com/delivery>.
- The legal basis for the processing of the above-mentioned data is a legitimate interest involving our survey of your preferences and behaviours in order to prepare and provide you with information about products, news and promotional campaigns that we believe may be of interest to you and will meet your needs (profiling), and direct marketing of the above-mentioned products (Article 6 (1) (f) GDPR). In addition, the possibility of the processing of personal data is confirmed by the acceptance of the Terms and Conditions of the 'Good Lood' Loyalty Programme.

#### **Marketing communications:**

We will send you marketing communications about our products, news and promotional campaigns, to which you have previously given your voluntary consent. You can withdraw your consent at any time, as easily as it was given. Consent withdrawal does not affect the lawfulness of actions taken before the withdrawal.

#### **Determination, assertion of and defence against claims:**

- To determine or assert claims, and to defend against such claims, we will process your User Account data, information about the orders placed in the Mobile Application and on the website <https://goodlood.com/delivery>, as well as the data related to your claims and complaints.
- The legal basis for the processing of the above-mentioned data is a legitimate interest involving the possibility to determine and assert claims or to defend against claims (Article 6 (1) (f) GDPR).

#### **Support for requests, claims, complaints or suggestions:**

- To process your request, claim, complaint or suggestion, we will process your data specified in the question, claim, complaint or suggestion.
- The legal basis for the processing of the above-mentioned data is a legitimate interest involving the possibility of providing you with an answer (Article 6 (1) (f) GDPR).

### **Guest satisfaction survey and the determination of service quality:**

- In order to survey the satisfaction of our Guests and determine the quality of our products and service, we will process your data specified in the questionnaire you may be asked to fill in.
- The legal basis for the processing of the above-mentioned data is a legitimate interest involving the obtainment of relevant information to improve the quality of our products and services (Article 6 (1) (f)).

## **5. AUTOMATED DECISION-MAKING**

We will not make decisions concerning your personal data based solely on automated data processing which would result in any legal consequences for you, or which would otherwise affect you significantly.

## **6. WHO IS YOUR PERSONAL INFORMATION PROVIDED TO?**

We will transfer your data to the entities that work on our behalf, i.e. service and IT solutions providers, payment service providers processing payments for orders placed using the Mobile Application, marketing agencies, companies providing accounting and administrative services, organisations that carry out Guest satisfaction surveys on our behalf.

## **7. WILL YOUR PERSONAL DATA BE TRANSFERRED TO A THIRD COUNTRY (I.E. A COUNTRY OUTSIDE THE EUROPEAN ECONOMIC AREA)?**

We will not transfer your personal information to third countries (i.e. countries outside the European Economic Area).

The payment service provider that handles payments within the Mobile Application processes your personal data on servers located within the European Economic Area, where the data may be accessed by employees or subcontractors of the payment service provider from third countries. The possible transfer of personal data to the payment service provider's subcontractors secures the acceptance of the Standard Contractual Clauses.

## 8. HOW LONG DO WE STORE YOUR PERSONAL DATA?

We keep your data for no longer than is necessary to achieve our purposes for which we process it. We will store your data:

- For the purposes of maintenance and service of your User Account and to enable you to participate in the 'Good Lood' Loyalty Programme and collect rewards until your withdrawal (the withdrawal can be submitted by deleting your account [an option in your account available after logging in], sending us a message to the email address [privacy@goodlood.com](mailto:privacy@goodlood.com), or sending us a mail to: Lood Is Good Spółka z ograniczoną odpowiedzialnością, ul. Radzikowskiego 35, 31-315 Kraków), your exclusion from participation in accordance with the Terms and Conditions, or the termination of the 'Good Lood' loyalty programme. We may extend this period by the limitation period of your or our claims arising from the law, if the processing of these data is important for the determination or assertion of claims as well as for the protection against such claims.
- For the purposes of order processing and delivery of products using the Mobile Application and the website <https://goodlood.com/delivery> - for the period necessary to fulfill the agreement concluded as a result of order acceptance or until the withdrawal of consent to data processing for subsequent orders.
- For the purposes of fulfilling our obligations under the provisions of law (e.g. the Accounting Act or tax legislation) - throughout the period arising from such provisions (e.g. for the billing purposes, your data will be stored for 5 years from the end of the calendar year in which the payment term of the tax associated with the order has expired). The payment service provider handling payments done within the Mobile Application shall keep the data concerning the handled payment transactions for a period of time resulting from the law applicable to the payment service provider.
- For the realisation of our legitimate interests specified in section 4 of the Policy (creation of guest profile for marketing purposes and direct marketing) - for the period of existence of a legally justified interest, unless you exercise your right and provide objections to the processing of your data for marketing purposes.
- For the realisation of our legitimate interests, i.e. the determination and assertion of claims or protection against claims - throughout the limitation period of your claims against us or our claims against you arising from the provisions of law (for example, the general limitation period for claims related to business activities is 3 years, while the general limitation period for our

Guest claims against us is 10 years; the above period of storage of personal data may change along with changes in current legislation).

- For the realisation of our legitimate interests, i.e. responding to your question, claim, complaint or suggestion - within the time required to respond, but for no more than 30 days, with the reservation that we may extend this period by the limitation period of your or our claims if the processing of these data is necessary to determine or assert claims, as well as to protect against such claims.
- For the realisation of our legitimate interests, i.e. our Guest satisfaction survey and the assessment of the quality of our services - during the period of our legally justified interest, but not more than 24 months.
- For the realisation of our legitimate interests, i.e. the analysis and amendment of errors in the operation of the Mobile Application. We will keep them for the duration of our legally justified interest, but not more than 24 months.

## **9. DO YOU HAVE THE RIGHT TO OBJECT TO THE PROCESSING OF YOUR DATA?**

### **WHAT ARE YOUR RIGHTS IN CONNECTION WITH THE PROCESSING OF YOUR PERSONAL DATA?**

#### **HOW CAN YOU EXERCISE YOUR RIGHTS?**

##### **Objection to the processing of data for marketing purposes:**

You have the right to object at any time to the processing of your data for marketing purposes, including profiling via sending an e-mail on the address: [privacy@goodlood.com](mailto:privacy@goodlood.com); or sending a registered letter on the head office's address included at the beginning of this privacy policy.

##### **Objection with regard to your specific situation:**

You have the right to file objections, at any time, to the processing of your personal data for the purposes of the realisation of our legitimate interest (other than marketing) for the reasons related to your specific situation. In this case, you should specify the situation that you believe justifies the cessation of the processing of your personal data subject to the objection.

##### **In addition, you have the following rights:**

- The right to receive a confirmation that process your personal data, as well as the right to access these data and their copies.



- The right to request the rectification (correction) or supplementing your personal data if they are incomplete or incorrect.
- The right to demand the restriction of the processing of personal data, for example if:
  1. you question the correctness of the processing of your personal data;
  2. the processing of your personal data is illegal, but you object to the deletion of these data demanding a restriction in their use instead;
  3. we no longer need your personal data to realise our objectives, but you need them to determine, assert or defend claims;
  4. you have raised an objection to our processing of your personal data in regard to your specific situation, in which case you may request us to limit the processing of your data until such time as our legitimate interests are determined to take precedence over the basis of your objection.

In the event of the restriction of the processing of your personal data, we will be able to store them and, additionally, use them only to determine, assert or defend claims, to protect the rights of a natural or legal person, or to provide for important considerations of public interest of the European Union or a member state. We can take other actions only with your consent.

- The right to request the deletion of your personal data, for example, if:
  1. Your personal data is no longer needed to achieve the purposes for which they were collected and processed;
  2. you file an objection to our processing of your personal data in regard to your specific situation and we have no grounds for the processing that would take precedence over your objection;
  3. you file an objection to our processing of these data for marketing purposes;
  4. we processed your personal data illegally.
- The right to transfer data: due to the fact that your data is processed automatically by consent or agreement, you have the right to receive from us the data that you provided to us on the basis of consent or agreement, in a structured, widely available machine-readable format (e.g. for reading on computer screen). You also have the right to request that your personal data be transferred by us directly to another administrator, if technically possible.
- The right to withdraw your consent, at any time, to the processing of your personal data in respect of the data that we process on the basis of the consent. The withdrawal does not affect the compliance with law of the processing performed by us on the basis of the consent prior to its withdrawal.

### **The right to withdraw the consent to marketing communications:**

You may withdraw the consent to marketing communications at any time. To do this, log in and change settings in your user account or email us at [privacy@goodlood.com](mailto:privacy@goodlood.com).

**To exercise your rights, you may contact us directly (contact details are given in section 3 above).**

### **A complaint lodged with a supervisory authority:**

You also have the right to file a complaint to the President of the Personal Data Protection Office of your habitual residence, place of work or place of alleged violation of personal data.

## **10. DO YOU NEED TO GIVE US YOUR PERSONAL DATA?**

The provision of your personal data for the purpose of creating a user account is voluntary, but necessary for the conclusion of the agreement concerning the participation in the 'Good Lood' Loyalty Programme, the creation and maintenance of the User Account and to order using the Mobile Application. If you do not provide these data, we will not be able to create your User Account. The provision of your personal data for the purpose of ordering using the website <https://goodlood.com/delivery> is likewise voluntary, but required to finalize the order.

## **11. WHAT IS GDPR?**

The GDPR is a regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of individuals in connection with the processing of personal data and the free flow of such data, and the repeal of Directive 95/46/EC (general data protection regulation).

## **12. WHEN DOES THIS PRIVACY POLICY COME INTO FORCE?**

This privacy policy applies from 21.08.2018.

## 13. COOKIE POLICY

### Information on the use of Cookies:

Lood Is Good Sp. z o.o. uses the so-called cookies in connection with the functioning of the website <https://goodlood.com> (and its subpages), and specifically the scope of orders placed on the website <https://goodlood.com/delivery>.

### What are cookies?

Cookies are a specific type of information that a website transfers to the hard drive of a user's computer or smartphone in order to store this information. They identify the user's browser and improve the operation of the service. Cookies can make the use of the Web easier, for example, by saving user passwords and preferences when he revisits a website. Good Lood does not use cookies to retrieve personal information from a user's device that has not been sent in a cookie. While most browsers automatically accept cookies, it is possible to change your browser setting to reject cookies. However, some features of the site may not function correctly.

### What user data do we collect?

During your visit, our servers automatically save the so-called system logs - anonymous information such as your visit time, IP address, URL address, browser data, etc. The collected logs are kept for indefinite period of time and are treated as an auxiliary material for service administration. The information contained therein is not disclosed to anyone other than those authorized to manage and maintain the servers and the network.

In addition, our service collects anonymous data about the sites visited, such as: number of visits, country, browser type, time of visit, etc. We analyze the collected data using a third-party solution. We currently use Google Analytics, but this might be subject to change in the future. The tool works on the basis of the so-called cookies and does not contain data that would allow to identify a person. For more details, please read the Google Analytics privacy policy.

### For what purposes are we processing your data?

Your data collected using cookies will be processed in order to adapt the content of the website to your needs, as well as to detect abuse and measure statistical data, and to improve the services provided by the website.

The processing of your data for the above-mentioned purposes is done on the basis of our legitimate interest. Our legitimate interest is to adapt the contents of the website,

to ensure the security of these services, and to further improve them.

### **For how long do we store your data?**

As for adapting the site's contents, detecting bots and abuse, measuring statistical data, and improving the service, your data will be processed until you object or stop using the services provided by the website. Otherwise, your data will be stored until the expiration of the statute of limitations for any claims related to your use of the services provided through the website.

### **Your rights regarding the processing of data**

You have the following rights regarding the processing of your data:

- The right to access your data, including obtaining a copy of your data,
- The right to request correction of your data,
- The right to request removal of your data,
- The right to request the restriction of data processing,
- The right to file a complaint with the supervisory authority in charge of personal data protection, i.e. the President of the Personal Data Protection Office.

To exercise the above-listed rights contact us via [privacy@goodload.com](mailto:privacy@goodload.com) or the mailing address: **Lood is Good sp. z o.o., ul. Radzikowskiego 35, 31-315 Kraków.**

### **The willingness to provide personal data:**

Processing your data for the purposes of adapting the website's content to your interests, detecting bots and abuse in the services we provide, measuring statistical data, and improving these services is necessary to ensure the high quality of the services we provide. Failure to collect your personal data for these purposes may prevent us from providing our services correctly.

### **How to change cookie settings or delete cookies?**

Most web browsers automatically accept cookies as a default. If you do not wish for cookies to be stored on your device, you can change your browser settings so that cookies are blocked: either partially or entirely. You can also change the settings so that you receive a message each time cookies are sent to your device.

However, please note that if you block the cookies we use, it will adversely affect your complete and comfortable use of the site. Moreover, it will also prevent us from collecting anonymous information about the use of the site in order to continuously improve its services and content. Comprehensive information is available in your

software (browser) settings. Instructions for managing cookies depending on the browser you use:

- Przeglądarka Internet Explorer:  
<http://support.microsoft.com/kb/196955/pl>
- Przeglądarka Mozilla Firefox:  
<http://support.mozilla.org/pl/products/firefox/cookies>
- Przeglądarka Chrome:  
<http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>
- Przeglądarka Opera:  
<http://help.opera.com/Linux/9.22/pl/cookies.html>
- Przeglądarka Safari:  
<http://support.apple.com/kb/PH5042>

The administrator of the data is:

Lood is Good sp. z o.o.

ul. Radzikowskiego 35, 31-315 Kraków

NIP 676 250 19 04, KRS 0000603176