I. GENERAL INFORMATION

This Privacy Policy sets out the rules governing the processing and use of personal data obtained from you by the online store PIERRE RENÉ, available at **pierrerene.pl**, the online store MIYO MAKE UP, available at **miyomakeup.com**, and the store LUBICZ GARDENS, available at **lubiczgardens.pl** (hereinafter jointly referred to as the "Online Store"), operated by **PIERRE RENE sp. z o.o.** (a Polish limited liability company), with its registered office in Ustka.

The Controller of personal data takes every reasonable measure to ensure respect for your privacy and the protection of the personal information provided when you use and make purchases through the Online Store, and undertakes all necessary actions to that end. As the manufacturer and seller of the goods offered in the store, supplying customers (including consumers) by means of the electronic provision of services, the Controller feels particularly responsible for the security of personal data processed in connection with its sales activity.

The purpose of this Privacy Policy is to duly inform you of all matters relating to the processing of personal data, in particular in light of the provisions on the protection of personal data, including **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, repealing Directive 95/46/EC GDPR").

This Privacy Policy and personal data protection policy applies to all cases in which PIERRE RENE sp. z o.o., with its registered office in Ustka, acts as the Controller of personal data and processes personal data. The personal data processed by the Controller comprise principally: first name and surname, e-mail address, telephone number and place of residence, and — in the event that a user account in the Online Store is created — also the following data: delivery addresses for orders placed; order history and order details; and any discount or promotional vouchers granted to you in connection with completed orders.

As a rule, personal data are obtained directly from the data subjects. In some cases, personal data may also originate from other persons or entities, in particular from: customers of the Online Store who provide the data of the recipients of orders, or from entities handling payments or the delivery of orders.

Terms not defined in this Privacy Policy shall be construed in accordance with the definitions contained in the Terms and Conditions (Regulamin) of the Online Stores: PIERRE RENÉ PROFESSIONAL, MIYO MAKE UP and LUBICZ GARDENS, available at: pierrerene.pl, miyomakeup.com and lubiczgardens.pl.

II. PERSONAL DATA CONTROLLER AND DATA PROTECTION OFFICER

The Controller of personal data is **PIERRE RENE sp. z o.o.**, with its registered office in Ustka at ul. Ogrodowa 7, entered in the Register of Entrepreneurs maintained by the District Court Gdańsk-Północ in Gdańsk, 8th Commercial Division of the National Court Register,under no. KRS 0000066419, Polish tax identification number NIP 839-27-87-943 and National Business Registry Number (REGON): 771512740.

The Controller's Data Protection Officer (DPO; in Polish: *Inspektor Ochrony Danych*, IOD) may be contacted at the following e-mail address: **violetta@pierrerene.pl**, as well as via the contact form and the contact details indicated on the website.

III. DETAILED INFORMATION

Depending on the nature of your relationship with the Controller, your personal data shall be processed for the purposes, for the periods and to the extent set out below:

1. Users of the websites: pierrerene.pl, miyomakeup.com and lubiczgardens.pl

A. Purpose of processing and legal basis

a. ensuring the proper operation of the website (Article 6(1)(f) GDPR) — processing is necessary for the purposes arising from the legitimate interest pursued by the Controller, consisting in operating the Controller's website;

b. marketing activities (Article 6(1)(f) GDPR) — processing is necessary for the purposes arising from the legitimate interest pursued by the Controller, consisting in marketing its products.

B. Data retention period

Data processed for statistical purposes and for the purpose of analysing website traffic shall be stored on a session basis or for a defined period determined by the parameters of the relevant cookie files.

C. Obligation to provide data

Use of the websites does not require the provision of personal data.

2. Customers of the Online Store

A. Purpose of processing and legal basis

a. for the purpose of performing a sales contract or taking steps prior to the conclusion of a contract at the request of the data subject (Article 6(1)(b) GDPR) — where you are a customer of the Online Store;

b. for the purpose of performing a contract for the provision of services by electronic means or taking steps prior to the conclusion of such a contract at the request of the data subject (Article 6(1)(b) GDPR) — where you have registered an account in the Online Store;

c. for the purpose of fulfilling obligations arising from legal provisions (Article 6(1)(c) GDPR), e.g. tax law or accounting regulations, that is, for the purposes of conducting settlements, accounting and financial reporting, archiving and the destruction of documents, and the handling of complaints ;

d. in connection with the pursuit of other legitimate interests of the Controller (Article 6(1)(f) GDPR) — the legitimate purpose being: the establishment, exercise and defence of legal claims; statistical purposes; purposes connected with improving work efficiency, the quality of the services rendered and tailoring them to recipients; and the preparation of and response to enquiries or other notifications.

B. Data retention period

Your personal data shall be stored for the period required by law or — if justified — until the expiry of the limitation periods for claims arising from the contract or from the Controller's public-law obligations, whichever is the longer; in any event, however, no longer than 10 years from the end of the calendar year, counting from the year following that in which the event capable of giving rise to such claims occurred.

In the event of registration of an account on the website, the Controller shall process your data until you delete the user account or in the event of prolonged (a minimum of 3 years) inactivity of the account.

Where data are processed in connection with the pursuit of the Controller's legitimate interests, the data shall be retained until an objection has been lodged. After such objection has been raised, the personal data may continue

to be retained for the purposes of demonstrating proper compliance with the legal obligations incumbent on the Controller.

C. Obligation to provide data

Where the processing of data is connected with your conclusion of a sales contract with the Controller, the provision of personal data is a contractual requirement or a condition for entering into the contract; and in the case of the Controller's obligation to render account of the business activity carried on by it — the obligation arises from the requirements of law. Failure to provide such data will make it impossible for the Controller to conclude or perform the contract or to fulfil its legal obligations, including the financial and accounting documentation required by law.

When you register an account in the Online Store, the provision of personal data is voluntary; however, failure to provide it will preclude the use of the full functionality of the Online Store available to registered users.

In the case of replies to enquiries or other notifications, the provision of personal data is not mandatory but is necessary for the effective handling of submissions and the provision of replies to individual enquiries.

3. Recipients of Commercial Information — Newsletter and SMS Messages

A. Purpose of processing and legal basis

a. processing of personal data for the purpose of sending commercial information by means of the newsletter or SMS messages takes place on the basis of the prior, explicit consent of the data subject (Article 6(1)(a) GDPR).

B. Data retention period

If your personal data are processed on the basis of consent, they shall be retained until consent is withdrawn. You are at all times entitled to withdraw the consent given for the processing of data, without prejudice to the lawfulness of the processing carried out on the basis of consent before its withdrawal. Withdrawal of consent given to the processing of personal data for the purpose of sending commercial information may consist in your unsubscribing from the newsletter or SMS messages, which can be effected — among other ways — by sending an e-mail or SMS message containing the word "STOP" to the e-mail address or telephone number indicated to you for this purpose by the Controller. **C. Obligation to provide data**

The provision of data is not mandatory but is necessary for the use of the newsletter or SMS message service.

4. Persons Contacting the Controller via the Contact Form or by E-mail

A. Purpose of processing and legal basis

a. for the purpose of handling and replying to an enquiry or other communication addressed to the Controller via the contact form or by e-mail (Article 6(1)(b) GDPR) — taking steps at the request of the data subject and for the purpose of performing the contract associated with the submission, where you are or shall be a party to such a contract;
b. for the purpose of considering the complaint, request or warranty claim submitted (Article 6(1)(f) GDPR), that is, the legitimate purpose of the Controller, consisting in the establishment, exercise and defence of legal claims, in statistical purposes and in the analysis of website traffic, connected with the improvement of work efficiency, the assurance of website functionality, the quality of the services rendered and their adaptation to recipients;
c. for the purpose of fulfilling obligations arising from legal provisions (Article 6(1)(c) GDPR), that is, for the purposes of conducting settlements, accounting and financial reporting, the archiving and destruction of documents — where applicable.

With regard to the processing of personal data contained in the body of the contact form or in the e-mail message, the legal basis for the processing of such data — depending on what the content thereof concerns — may also be provided in other parts of this Privacy Policy.

B. Data retention period

Your personal data shall be retained for the period necessary for the purposes for which the data are processed, but no longer than 10 years from the end of the calendar year, counting from the year following that in which the submission via the contact form or by e-mail took place.

The retention period for the data constituting the content of a submission via the contact form or by e-mail may depend on the purpose of processing to which such content relates. In such circumstances — where different deletion deadlines apply — information to that effect is contained in a separate part of this Privacy Policy.

Personal data processed for statistical purposes and for the purpose of analysing website traffic shall be retained for the period during which the Controller has legal bases for processing the data other than those purposes; once the legal bases for processing have ceased, the personal data shall not be processed for statistical or traffic-analysis purposes.

C. Obligation to provide data

The provision of data is voluntary; however, in the event of failure to provide personal data, the Controller will not be in a position to respond appropriately to your submission via the contact form or by e-mail.

5. Persons Contacting the Controller by Telephone

A. Purpose of processing and legal basis

a. for the purpose of pursuing the Controller's legitimate interest (Article 6(1)(f) GDPR), consisting in the operation of a telephone helpline, in the consideration of complaints, requests or warranty claims submitted, as well as for the purpose of the establishment, exercise and defence of legal claims and ensuring appropriate contact with the Controller;
b. for the purpose of performing the contract or, where information is to be provided, for the purpose of taking steps at the request of the data subject prior to the conclusion of a contract (Article 6(1)(b) GDPR).

B. Data retention period

The Controller does not record or otherwise capture telephone conversations. The processing of personal data (in particular the telephone number or other data provided by the person) takes place for the period necessary for the achievement of the purpose of processing.

C. Obligation to provide data

The provision of your data is voluntary, but is necessary for establishing telephone contact with the Controller and for handling the matter to which the telephone contact relates.

IV. INFORMATION ON THE RECIPIENTS OF PERSONAL DATA

The Controller may disclose personal data to the following categories of recipients:

a. companies providing maintenance and support services for IT systems, including web-hosting services;
b. entities providing postal services, courier and transport companies, for the purposes of delivering the products ordered;

c. banks and the entity handling electronic payments;

d. law firms — in the event of legal advisory services and the representation of the seller's interests, where such a need arises;

e. companies providing marketing services — where the customer has consented to the processing of data for marketing purposes;

f. entities processing personal data on the basis of data-processing entrustment agreements (data processors);

g. entities providing services in the area of survey research, including customer satisfaction surveys; h. recruitment companies;

i. debt-collection companies;

j. auditors and statutory auditors;

k. tax advisers and other entities providing advisory and audit services;

l. State authorities or other entities authorised by virtue of law, for the purpose of fulfilling the obligations imposed on the Controller; m. law-enforcement authorities, regulatory authorities and other public-administration authorities.

Whenever it is necessary to disclose your personal data to third parties, the Controller takes every reasonable step to ensure that the volume of data transferred is limited to the minimum necessary.

As a rule, the Controller does not intend to transfer your data to a third country whose seat lies outside the European Economic Area (EEA), nor to international organisations. Bearing in mind, however, the services provided by the Controller's subcontractors in the context of support for ICT services and IT infrastructure, the Controller may entrust the performance of certain IT-related tasks or activities to reputable subcontractors operating outside the EEA (e.g. providers of Google Analytics, Google Tag Manager and the Klaviyo platform), which may result in the transfer of your data outside the EEA.

Any transfer of data outside the EEA shall take place on the terms set out in the GDPR — in particular, the transfer may take place in accordance with a European Commission decision ensuring an adequate level of data protection in the country of the data recipient, in line with EEA standards.

V. INFORMATION ON AUTOMATED DATA PROCESSING

The Controller processes data in an automated manner, including information collected by means of cookie files, analytical and marketing tools used during the use of the Online Store, as well as in sessions, shopping carts (quotes), logs and events captured by Magento.

Cookie files are small text files sent by the Online Store and stored on your computer that contain certain information related to your use of the Online Store. Magento is an online sales platform used to create and manage online stores, enabling the online sale of products and the automated processing of users' data.

1. Types of cookies used during use of the Controller's Online Store

Classification by storage period on the user's device:	**Classification by purpose of use:**

1) **session cookies** (which expire after a certain time, defined by the parameter *cookie_lifetime*, or upon closing the web browser); and 2) **persistent cookies** (stored for a defined period determined by the parameters of each individual file or until manually deleted).	1) **strictly necessary** — these assist in the proper functioning of the website by enabling fundamental functions, such as page navigation and access to secured areas of the site. The website cannot function properly without these cookies; 2) **preference cookies** — these enable the website to remember information that changes the way it operates or its appearance, such as the chosen language or the region in which the user is located; 3) **statistical cookies** — these help website owners to understand how visitors interact with the site by collecting and reporting information anonymously; 4) **marketing cookies** — these are used to track users across various websites. Their purpose is to display advertisements that are relevant to and engaging for the individual user, and thereby more valuable to publishers and third-party advertisers.

List of key cookie files used by the Controller:

Type	**Description of purpose**	**Maximum storage period**
PHPSESSID	strictly necessary cookie maintaining the user's session state during navigation between pages	1 day
form_key	strictly necessary cookie used to ensure the security of the website and of the visitor and to prevent cyberattacks	1 day
private_content_version	this cookie facilitates the storage of content in the browser's cache so that pages load more quickly	1 year
mage-cache-sessid	strictly necessary cookie used for load balancing — it optimises the response time between the visitor and the website by distributing network traffic across multiple connections or servers	1 day
mage-messages	strictly necessary cookie used to ensure the proper operation of the chat function on the website	1 day
sectiom_data_ids	this cookie is used to ensure the functionality of the shopping cart — it remembers items from the wishlist and the visitor's login data during checkout	1 day

2. Purposes of processing data contained in cookie files during use of the Controller's Online Store

Purposes of using cookies in the Controller's Online Store	**Description**
Purposes	identifying users as logged in to the Online Store and indicating that they are logged in (strictly necessary cookies)
	remembering products added to the shopping cart for the purpose of placing an order (strictly necessary cookies)
	remembering data entered in order forms, surveys or login details for the Online Store (strictly necessary cookies and/or functional/preference cookies)
	tailoring the content of the Online Store website to users' individual preferences (e.g. as regards colours, font size or page layout) and optimising the use of the Online Store's pages (functional/preference cookies)
	conducting anonymous statistics presenting how the Online Store website is used (statistical cookies)
	transmitting information about the user to Google for advertising purposes
	remarketing — that is, examining the behavioural characteristics of visitors to the Online Store by anonymously analysing their actions (e.g. repeated visits to specific pages, keywords, etc.) in order to construct their profile and deliver them advertisements matched to their predicted interests, including when they visit other websites within the Google advertising network (marketing, advertising and social-media cookies)

3. Methods by which users may verify the cookies in use

In Chrome:	**In Mozilla Firefox:**	**In Microsoft Edge:**
click on the padlock or sliders icon on the left-hand side of the address bar, select "Cookies and site data", and then go to the "Manage on-device site data" section.	go to Settings → Privacy & Security → Cookies and Site Data.	click on the padlock icon on the left-hand side of the address bar, select "Permissions for this site", and then go to the "Cookies and site data" section.

In Safari:	Alternatively (Edge):
open the Safari menu → Preferences, go to the "Privacy" tab, then click "Manage Website Data...".	go to Settings → Cookies and site permissions → Manage and delete cookies and site data, or type into the address bar: `edge://settings/content/cookies`.

4. Users' consent to the use of cookies and the determination of the conditions of their use

Upon the user's first visit to the Online Store website, the Controller requests consent to the use of optional cookie files, that is to say those that are not strictly necessary for the proper functioning of the site (by clicking the "Accept all" field). The user may consent to the use of individual categories of cookie files on the Online Store website (by clicking the "Customise" field), or do so by means of the user's own browser settings. The Controller likewise enables the user to refuse consent to the use of optional cookie files (by clicking the "Reject optional" field).

Each user has the ability to specify the conditions for the use of cookies through the settings of their own web browser — it is possible, for example, to partially restrict (e.g. on a temporary basis) or entirely disable the saving of cookie files. In the latter case, however, this may affect certain functionalities of the Online Store.

The settings of the web browser as regards cookie files are material from the standpoint of consent to the use of cookies by the Online Store. Detailed information on changing cookie settings and on independently deleting them in the most popular web browsers is available in the help section of the relevant browser and on the following pages (simply click the relevant link):

in Chrome in

Firefox in Safari

in Microsoft

Edge

5. Analytical and marketing tools

In the Online Store, the Controller may use the services of Google Analytics 4 (GA4) and Google Tag Manager, as well as the Klaviyo platform, supplied by providers established outside the European Economic Area (e.g. in the United States), in the following manner:

Google Analytics 4 (GA4) — the Controller uses identifiers (*client_id*); Google automatically anonymises users' IP addresses and applies pseudonymisation of data;

Google Tag Manager — a tool for managing tags and scripts, enabling the implementation of analytical and marketing tools;

Klaviyo — the Controller uses user identifiers (e.g. cookies or identifiers such as *_kla_id*) and tracking mechanisms (pixels, events).

These services assist the Controller in compiling statistics and analysing traffic in the Online Store, as well as in collecting data on customer behaviour for the purpose of directing marketing actions at customers in order to increase engagement and sales. The data collected are processed within the framework of the foregoing services to generate statistics, conduct marketing activities and analyse user behaviour. The data may be aggregated in nature (e.g. Google Analytics) or individual (e.g. Klaviyo). When using the foregoing services in the Online Store, the Controller collects, inter alia, the following data: the sources and medium by which visitors are acquired to the Online Store; their behaviour on the Online Store website; information on the devices and browsers from which

the site is visited; approximate location; information on the user's network and device; and estimated demographic data (age, gender and interests).

VI. RIGHTS OF DATA SUBJECTS

Natural persons are afforded specified rights in respect of their personal data, and the Controller is responsible for giving effect to those rights in accordance with the applicable provisions of law.

For this purpose, please contact the Data Protection Officer (DPO) at the e-mail address indicated in Section II. With regard to any questions or requests concerning the scope and exercise of these rights, and in order to exercise a specific entitlement in the area of personal data protection, the Controller asks you to make contact at the e-mail address of the DPO indicated.

1. Right of access to your data (Article 15 GDPR)

You have the right of access to the personal data that you have made available to the Controller. The Controller exercises this right principally by means of electronic communication, by providing you, upon request, with information as to which data are subject to processing. You may also obtain from the Controller copies of the data held by the Controller. No charge is made for the preparation, compilation and provision of the first copy of the data. In the event of subsequent requests, the Controller may charge you a fee covering the costs of the preparation, compilation and provision of such data.

2. Right to rectification (Article 16 GDPR)

You have the right to have your personal data rectified (corrected). The Controller exercises this right principally by means of electronic communication, by enabling you to submit information regarding any change to your personal data.

3. Right to erasure (Article 17 GDPR)

You have the right to request the erasure of your personal data. The Controller gives effect to this right on the basis of an explicit request to delete the data submitted by you. A request for the erasure of personal data may result in the cessation of the provision of electronic services by the Controller. You may exercise the right to erasure where:

a. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

b. you withdraw the consent on which the processing is based and there is no other legal basis for further processing;

c. the personal data have been processed unlawfully;

d. the personal data have to be erased for compliance with a legal obligation in Union law or Member State law.

The exercise of the right to request the erasure of personal data may be limited where the processing of data is necessary for the Controller to fulfil an obligation arising from legal provisions, or for the establishment, exercise or defence of legal claims.

4. Right to restriction of processing (Article 18 GDPR)

You have the right to request the restriction of the processing of personal data. The Controller gives effect to this right on the basis of an explicit request for restriction of processing, together with a justification, submitted by you. You may exercise the right to restriction of processing in the following circumstances:

a. where you contest the accuracy of the personal data provided — for a period enabling the accuracy of the data contested to be verified;

b. the processing of personal data is unlawful but you oppose the erasure of your personal data;

c. the personal data processed by the Controller are no longer necessary for the purposes for which they were processed, but you require them for the establishment, exercise or defence of legal claims;

d. you have lodged an objection to the processing of personal data.

5. Right to data portability (Article 20 GDPR)

You have the right to lodge a request concerning the transfer of personal data to another service provider. However, for security reasons and in the absence of standards relating to the portability of data, the Controller is unable to give effect to such a request. In accordance with the principles adopted by the Controller, you may instead receive from the Controller a copy of the personal data provided.

6. Right to object to the processing of data (Article 21 GDPR)

You have the right to object to the processing of your personal data. The Controller gives effect to this right on the basis of an explicit objection to the processing of personal data submitted by you. You may exercise the right to object to the processing of personal data in cases where such processing takes place in connection with the pursuit by the Controller of a legitimate interest.

7. Right not to be subject to decisions taken under conditions of automated processing of data, including profiling (Article 22 GDPR)

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, unless such processing is necessary for entering into or performing a contract between you and the Controller, is authorised by Union law or by Polish law which lays down suitable measures to safeguard the rights, freedoms and legitimate interests of the data subject, or is based on your explicit consent.

8. Right to lodge a complaint with the supervisory authority (Article 77 GDPR)

You have the right to lodge a complaint relating to the processing of your personal data with the supervisory authority, that is, the President of the Personal Data Protection Office (in Polish: *Prezes Urzędu Ochrony Danych Osobowych*), ul. Stawki 2; 00-193 Warsaw.

9. Right to withdraw consent (Article 7(3) GDPR)

Where personal data are processed on the basis of consent, you have the right to withdraw such consent at any time. Information on the possibility of withdrawing consent is communicated at the moment when consents are collected, and consent may be withdrawn as easily as it was given. In the absence of any indication to the contrary, the withdrawal of consent shall be effected by sending a message to the e-mail address of the Data Protection Officer (DPO) indicated in Section II of this Privacy Policy.

VII. METHODS AND TECHNICAL MEANS FOR DETECTING AND CORRECTING ERRORS IN DATA ENTERED

If you hold an account, during the placement of an order — until the moment when the “Place order” button is clicked — you may rectify the data entered yourself, by editing your account profile.

The verification of data or the correction of an order may also be effected by sending an e-mail to the Controller at the address: **sklep@pierrerene.pl** (in respect of PIERRE RENÉ PROFESSIONAL products), **sklep@miyomakeup.com** (in respect of MIYO MAKE UP products) or **sklep@lubiczgardens.pl** (in respect of LUBICZ GARDENS products).

You have the ability to amend the data entered when creating the account at any time, within the options made available.

Information on the principles and methods of recording, securing and making available to the other party of the contract the content of the contract concluded:

a. the recording, securing and making available of the content of the contract concluded shall be effected by sending an appropriate e-mail message after the conclusion of the sales contract;

b. the recording, securing and making available of the content of the sales contract concluded shall be effected by sending you, at the e-mail address provided, the content of the contract concluded, or by providing the order specification together with the proof of purchase;

c. the content of the contract concluded is additionally recorded and secured in the Controller's ICT system and is made available at your every request.

VIII. METHODS AND MEANS FOR ENSURING THE SECURITY OF PERSONAL DATA

The Controller takes every reasonable measure in order to safeguard your data and to protect them against the actions of third parties. To that end, the Controller employs all necessary safeguards in respect of servers, connections and websites for the protection of your data.

All connections used in connection with the execution of electronic payments by you, where such option is selected, shall be effected via a secure encrypted connection.

The actions taken by the Controller may, however, prove insufficient if you yourselves do not observe the principles of security. In particular, you must keep your login and password to the Online Store confidential and must not disclose them to third parties. Please be aware that the Online Store will never request that you provide them, save for at the moment of logging in. In order to prevent unauthorised use of your account by unauthorised persons, please log out upon completion of your use of the Online Store.

From time to time, links to other websites may appear within the Online Store. Such websites operate independently of the Controller's Online Store and are not in any way supervised by the Controller. Such sites may have their own privacy policies, with which we recommend that you familiarise yourselves. The Controller bears no responsibility for the principles governing the handling of data on such sites.