

PRIVACY AND COOKIES POLICY

1. General provisions

- 1.1. This Privacy and Cookies Policy sets out the rules for the use, sharing and protection of your personal data (hereinafter: “**Personal Data**”) obtained via the website: <https://packetastore.com/> (hereinafter: the “**Website**”) and from our Users.
- 1.2. This Privacy Policy forms an integral part of the Terms and Conditions of the Website <https://packetastore.com/> (hereinafter: the “Terms and Conditions”). Definitions of the terms used in this Privacy Policy are set out in the Terms and Conditions. The provisions of the Terms and Conditions apply accordingly.
- 1.3. The Website is managed by Packhelp S.A., with its registered office in Warsaw, ul. Kolejowa 5/7, 01-217 Warsaw, entered in the register of entrepreneurs of the National Court Register maintained by the District Court for the Capital City of Warsaw in Warsaw, 13th Commercial Division of the National Court Register, under KRS number: 0000831872 (hereinafter: “**Packhelp**” or the “**Controller**”);
- 1.4. Packhelp is the controller of your personal data within the meaning of 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 the “**GDPR**”.
- 1.5. The Controller can be contacted on matters related to the processing of personal data by e-mail at: gdpr@packhelp.com.
- 1.6. The Controller takes particular care to respect the privacy of Users who visit the Website and use services through it. The Controller guarantees the confidentiality of all personal data provided and ensures that all security and personal data protection measures required by data protection regulations are taken. Personal data is collected with due care and is adequately protected against access by unauthorised persons.

2. Information we collect

- 2.1. We collect information about our Users and Visitors.
- 2.2. When you visit our Website, Packhelp automatically collects the following information about you: IP address, operating system type, web browser type and activity on the website: visits to individual pages and clicks on function buttons.
- 2.3. If you provide us with your Personal Data by completing the registration form in order to create an Account or to contact us, Packhelp collects the following Personal Data: e-mail address, first name, surname.
- 2.4. If you provide us with your Personal Data in order to fulfil an Order, Packhelp collects the following Personal Data: e-mail address, first name, surname, company name, country, tax identification number (or its equivalent), address, postcode, city, province (or its equivalent).
- 2.5. If you contact our Packhelp customer service staff, you may also provide us with other Personal Data, depending on the subject of your enquiry to customer service. In the case of telephone contact, we will process your voice recorded during the call, of which you will be informed before the call begins.
- 2.6. From time to time, the Controller may offer you the opportunity to take part in lotteries, competitions and surveys on our Website. If you participate in them, we will collect other Personal Data, depending on the terms of the lotteries, competitions and surveys. Participation in such lotteries, surveys and competitions is entirely voluntary, and you therefore have the choice of whether to disclose the requested information.
- 2.7. Providing Personal Data is voluntary, but failure to provide Personal Data marked as mandatory will prevent the Controller from providing the relevant services and performing Sales Agreements.

3. Purposes, scope and period of personal data processing

- 3.1. Purpose of processing: performance of the agreement by the Controller

Legal basis: Article 6(1)(b) GDPR with regard to the conclusion, performance and termination of the agreement (processing is necessary for the performance of the agreement concluded with the Controller).

Retention period: the period necessary for the performance, termination or expiry of the agreement. Scope of data: e-mail address, first name, surname, company name, telephone number, job title, tax identification number, address.

- 3.2. Purpose of processing: contacting the Controller, including responding to your enquiries via chat

Legal basis: Article 6(1)(a) GDPR (consent given to the processing of Personal Data).

Retention period: until the User withdraws consent and, after consent is withdrawn, for a period corresponding to the limitation period for claims that may be raised by or against the Controller.

Scope of data: first name, surname, e-mail address and other data voluntarily included in the content of the message.

- 3.3. Purpose of processing: telephone contact with Packhelp, including responding to your enquiries, improving the quality of customer service, assessing the quality of services provided by Packhelp, and training Packhelp employees and associates

Legal basis: Article 6(1)(a) GDPR (consent given to the processing of Personal Data).

Retention period: until the User withdraws consent or for a period of 6 months from the date the data was obtained.

- 3.4. Purpose of processing: fulfilment of tax obligations Legal basis: Article 6(1)(c) GDPR in conjunction with Article 86 § 1 of the Tax Ordinance Act of 29 January 1997 (consolidated text: Journal of Laws 2019, item 900) and/or Article 74(2) of the Accounting Act of 29 September 1994 (fulfilment of a legal obligation).

Retention period: the data is stored for the period required by the laws obliging the Controller to keep tax records (until the limitation period for the tax liability expires, unless tax laws provide otherwise) or accounting records (5 years from the beginning of the year following the financial year to which the data relates).

Scope of data: first name and surname, company name, the User's tax identification number (NIP), financial data related to the performance of the agreement.

- 3.5. Purpose of processing: establishing, pursuing or defending claims that may be raised by or against the Controller in connection with a placed order or concluded agreement Legal basis: Article 6(1)(f) GDPR (pursuit of the Controller's legitimate interests related to establishing, pursuing and defending claims).

Retention period: the data is stored until the limitation period for claims arising from the agreement concluded with the Controller expires, with the limitation period being determined by the provisions of the Civil Code.

Scope of data: e-mail address, first name and surname, tax identification number (NIP), PESEL number, financial data, telephone number.

- 3.6. Purpose of processing: carrying out promotional and marketing activities, including sending marketing and commercial information electronically to the Controller's customers

Legal basis: Article 6(1)(f) GDPR (the Controller's legitimate interest in carrying out marketing activities towards its customers).

Retention period: the term of the agreement concluded with the Controller, not shorter than the period during which the User has an active account.

Scope of data: first name, surname, e-mail address and other data voluntarily included by the User in the content of the message.

3.7. Purpose of processing: sending the newsletter

Legal basis: Article 6(1)(a) GDPR (consent given to the processing of Personal Data) and Article 9(1)(f) GDPR (pursuit of the Controller's legitimate interests related to the promotion of the services and products it offers).

Retention period: until the User withdraws consent and, after consent is withdrawn, for a period corresponding to the limitation period for claims that may be raised by or against the Controller.

Scope of data: first name, surname, e-mail address and other data voluntarily included by the User in the content of the message.

3.8. Purpose of processing: maintaining and improving our Website, including the security and personalisation of your use of the Internet, ensuring that content is presented in the most effective way for you, as well as administering our Website and carrying out internal operations, including troubleshooting, data analysis, research, testing, and statistical and research purposes.

Legal basis: Article 6(1)(f) GDPR, i.e. the Controller's legitimate interest in improving the Website and serving Website visitors

Retention period: 6 months

Scope of data: first name, surname, e-mail address, IP address, operating system type, web browser type, activity on the website: visits to individual pages and clicks on function buttons.

Where the basis for processing personal data is your consent, you may withdraw it at any time by contacting us by e-mail at: gdpr@packhelp.com. Withdrawal of consent to data processing does not affect the lawfulness of the processing of personal data carried out before its withdrawal.

4. Recipients of Personal Data

4.1. For the Website to function properly and for services to be provided professionally, the Controller needs to use the services of external entities. The Controller only uses the services of processors that provide sufficient guarantees of implementing appropriate technical and organisational measures so that processing meets the requirements of the GDPR and protects the rights of data subjects.

4.2. We may entrust the processing of your Personal Data to third parties. In that case, the recipients of your Personal Data are:

4.2.1. for operations specified in the Terms and Conditions: we may transfer your Personal Data to entities supporting us in our day-to-day operations, including entities performing components of Orders or other services of the Controller specified in the Terms and Conditions, or enabling such operations to be performed. In particular, these may be: (a) providers of accounting, financial, legal and advisory services, (b) the Website hosting provider, (d) the company providing technical support for the Website, (e) the payment processing company, (f) the carrier, (g) the company supplying software used in performing the operations specified in the Terms and Conditions, including service

providers supplying the Company with technical, IT and organisational solutions, (h) the Partner, if necessary to fulfil Orders, (i) other entities, if the use of their services is necessary for the proper functioning of the Website and the provision of services by the Controller,

- 4.2.2. for external partners: we may cooperate with third parties to provide you with access to information about Goods or services that we think may be of interest to you. We will only disclose your Personal Data to third parties if you have consented to receiving information from third parties,
- 4.3. Personal Data collected by the Controller may also be disclosed: to the relevant state authorities at their request on the basis of the relevant legal provisions, or to other persons and entities – in cases provided for by law.
- 4.4. Each entity to which the Controllers entrust the processing of Personal Data guarantees an appropriate level of security and confidentiality in the processing of Personal Data. The processor will process Personal Data on the basis of a Data Processing Agreement.
- 4.5. The Controller may transfer Personal Data to third countries where any of the entities indicated in point 4.1 above processes data in a third country, and only where the European Commission has issued an adequacy decision or using contractual clauses approved by the European Commission.

5. Profiling

- 5.1. Profiling is carried out on the Websites through session recording, analysis using “clickmaps” and event-based analytics (Segment), which will involve creating dynamic and automated:
 - 5.1.1. advertising messages and content,
 - 5.1.2. forms of after-sales communication,
 - 5.1.3. methods of segmenting contacts and sending e-mails,
 - 5.1.4. abandoned cart reminders,
 - 5.1.5. methods of selecting communication channels,
 - 5.1.6. contact management methods.
- 5.2. The result of profiling will be the generation of personalised marketing activities and the creation of sales analyses and forecasts.
- 5.3. You can object to the profiling of your person by writing to this e-mail address: gdpr@packhelp.com.

6. User rights

- A User of the Website has the following rights arising from the processing of their personal data:
- 6.1. the right to request access to their own personal data – the User has the right to obtain confirmation as to whether the Controller processes their personal data and, if so, is entitled to access the data and receive information about the data, such as: the purpose of processing, the categories of data, information about the recipients or categories of recipients to whom the data has been or will be disclosed, the planned retention period of the personal data or the criteria for determining that period; this right also includes the right to receive a copy of the data free of charge (for any further copies requested by the User, the Controller may charge a reasonable fee based on administrative costs),
 - 6.2. the right to rectification of personal data (where it is inaccurate), which also includes the right to request that incomplete personal data be completed,
 - 6.3. the right to erasure of personal data (the so-called “right to be forgotten”) in the following circumstances: the User’s personal data is no longer necessary for the purposes for which it was collected; the User has withdrawn consent to its processing and there is no other basis for processing; the User has objected to the processing; the personal data has been processed unlawfully; the personal data must be erased to comply with a legal obligation under European Union law or the law of a Member State to which the Controller is subject; the personal data has been collected in connection with the offer of information society services,
 - 6.4. the right to restriction of processing where: the User contests the accuracy of the personal data (for a period enabling the Controller to verify its accuracy); the processing is unlawful and the User opposes the erasure of the data; the Controller no longer needs the personal data for the

purposes of processing, but the User needs it to establish, pursue or defend claims; the User has objected to processing, pending verification of whether the Controller's legitimate grounds override the User's grounds for objection,

- 6.5. the right to object to processing where: the User does not want the Controller to process their data on the basis of a legitimate interest – Article 6(1)(f) GDPR,
- 6.6. the right to data portability, including receiving from the Controller, in a structured, commonly used and machine-readable format, the personal data provided by the User, including the right to request that the personal data be transmitted by the Controller directly to another controller (where technically feasible),
- 6.7. the right to withdraw consent to data processing at any time (withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal),
- 6.8. the right to lodge a complaint with the President of the Personal Data Protection Office if the User considers that the processing of personal data infringes the provisions of the Regulation.

7. Cookies

- 7.1. Packhelp uses cookies, i.e. small pieces of text information stored on the User's end device (e.g. computer, tablet, smartphone) which can be read by Packhelp's ICT system.
- 7.2. Cookies are text files containing small amounts of information that are downloaded to a personal computer, mobile phone or other device when a user visits a website. Cookies are then sent back to that website on each subsequent visit, or to another website that uses cookies. Cookies perform many different tasks; for example, they allow you to navigate efficiently between pages, remember your preferences and generally improve the user experience. They can also help ensure that the advertisements you see online are more relevant to you and your interests.
- 7.3. We use the following categories of cookies on our Website. Detailed information about the cookies currently in use can be found in the cookie settings available on the Website:

7.3.1. Strictly necessary cookies

These cookies are essential to enable you to move around the Website and use its features, such as accessing secure areas of the Website. Without these cookies, services you have requested, such as shopping baskets or e-invoicing, cannot be provided. You can disable these cookies in your browser settings, but this may adversely affect how the Website works.

7.3.2. Analytics cookies

These cookies help us understand user behaviour in order to provide a more relevant browsing experience or to personalise content on our website. For example, we collect information about the pages visited to help us present more relevant information.

7.3.3. Functional cookies

These cookies are necessary for the Website to function properly. They allow the Website to remember the choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have requested, such as watching a video or commenting on a blog.

7.3.4. Advertising cookies

These cookies collect information about your browsing habits in order to deliver advertising tailored to you and your interests, provided that you consent to this by selecting the appropriate options in the cookie settings or in your browser. They are also used to limit the number of times you see an advertisement and help measure the effectiveness of advertising campaigns. They are usually placed by advertising networks with our permission. They remember that you have visited a website, and this information is shared (in an aggregated and anonymous way) with other entities such as advertisers. Quite often, advertising cookies will be linked to site functionality provided by another entity. If you enable these cookies, you can still use the Website without restrictions.

7.4. How can you change your cookie settings?

On your first visit to our Website, information about the use of cookies is displayed together with a request for consent to the use of cookies. The User can manage cookies from the website. You can change your preferences regarding the collection of cookies at any time in the cookie settings. You can also change your cookie settings in your browser or delete cookies altogether. Please remember that disabling cookies may make it difficult to use the website. The Help option on the menu bar of most browsers will tell you how to enable or prevent your browser from accepting new cookies, how to have your browser notify you when you receive a new cookie, and how to disable cookies altogether. You can also disable or delete similar files used by browser add-ons, such as Flash cookies, by changing the add-on settings or by visiting your provider's website.

If you are using a computer – click the "Help" button at the top of the browser window and select the "About" option. If you are using a MacBook – with the browser window open, click the Apple menu and select the "About" option. • For Flash cookies (or Local Shared Objects) – the Adobe website provides comprehensive information on how to delete or disable Flash cookies – see <http://www.adobe.com/security/flashplayer/>. • For third-party cookies – if you want to disable third-party cookies, set your browser accordingly.

8. Server logs

- 8.1. Using the website involves sending requests to the server on which the website is stored. Each request sent to the server is recorded in the server logs.
- 8.2. The logs include, among other things, the User's IP address, the server date and time, and information about the User's web browser and operating system. The logs are recorded and stored on the server.
- 8.3. The data recorded in the server logs is not associated with specific persons using the Website and is not used by Packhelp to identify the User.
- 8.4. The above data is used solely for server administration purposes. Server logs are only auxiliary material used to administer the website, and their content is not disclosed to anyone other than persons authorised to administer the server

9. Security of the Website and Personal Data

- 9.1. The Controller applies all the necessary technical measures specified in Articles 25, 30, 32-34 and 35-39 GDPR to ensure enhanced protection and security of the processing of Personal Data.
- 9.2. We maintain physical, electronic and procedural safeguards to the extent necessary to protect your Personal Data against loss, misuse, disclosure and alteration. For example, we use Transport Layer Security (TLS) technology to encrypt payment information when you purchase products via our Website.
- 9.3. If you create an Account on the Website, you must choose a password to protect the information in your Account. The strength of the password is up to you: you should choose a unique password and keep it secure. You can change your password as often as you like by going to the My Account section of the Website. You are responsible for keeping your password secret. Please do

not share your password with other people. Our login process has been designed to protect your privacy. If you have trouble logging in to our website, make sure you are using your registered e-mail address and the correct password. If you are using your registered e-mail address and the correct password and still have trouble logging in to our Website, please contact us using the details provided above.

- 9.4. We would also like to point out that using the Internet and services provided electronically, especially public Wi-Fi networks, may involve particular ICT risks, such as the presence and activity of Internet worms, spyware or malware, including computer viruses, as well as exposure to cracking or phishing (password fishing), and others. To obtain detailed and professional information on staying safe on the Internet, we recommend consulting entities specialising in this type of IT service.

10. Final provisions

- 10.1. This Privacy Policy enters into force on 01.10.2026.