

PRIVACY AND COOKIES POLICY

This Privacy and Cookies Policy (hereinafter: the “Privacy Policy”) constitutes a set of rules governing the processing of Users’ personal data and the collection of cookies on the websites www.greektrade.com.pl and www.b2b.greektrade.com.pl, owned by Greek Trade Sp. z o.o. with its registered office in Kraków (hereinafter: the “Website”).

Before using the Website, the User should read this Privacy Policy. The purpose of the Privacy Policy is, among others, to fulfil the information obligation referred to in Article 13(1) and (2) 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”.

This Privacy Policy also contains information on the processing of personal data of:

- persons who contact Greek Trade Sp. z o.o. (by telephone, e-mail, via contact form, or by post) or who are contacted by Greek Trade Sp. z o.o. (by telephone, e-mail, or by post),
- persons who are contractors of Greek Trade Sp. z o.o., or employees or representatives of contractors of Greek Trade Sp. z o.o. with its registered office in Kraków.

INFORMATION FOR CONTRACTORS, EMPLOYEES AND REPRESENTATIVES OF CONTRACTORS; PERSONS WHO CONTACT GREEK TRADE SP. Z O.O. IN ANY FORM (BY TELEPHONE, E-MAIL, VIA CONTACT FORM, BY POST); PERSONS CONTACTED BY GREEK TRADE SP. Z O.O. (BY TELEPHONE, E-MAIL OR BY POST), AND USERS OF THE WEBSITE www.greektrade.com.pl AND www.b2b.greektrade.com.pl .

Pursuant to Article 13(1) and (2) 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”), we hereby inform you that we process your personal data.

The necessary information in this regard is provided below.

How we obtained your personal data

We obtained your personal data:

1. directly from you, as a result of sending an e-mail message, completing a contact form, or contacting us in any other manner;

2. from your employer/co-worker or from the entity you represent, which provided us with your data – including your name, business telephone number and business e-mail address – indicating you as a contact person or publishing your contact details in marketing materials, publications, or online.

Who is the Controller of your personal data

The Controller of your personal data is Greek Trade Sp. z o.o., with its registered office in Kraków.

You can contact us as follows:

- by post: Greek Trade Sp. z o.o., ul. Tadeusza Śliwiaka 14, 30-797 Kraków, Poland
- by e-mail: iod@greektrade.com.pl
- by telephone: +48 12 345 20 65

Data Protection Officer (DPO)

We have appointed a Data Protection Officer: Ms Ewa Zielińska-Siakas (hereinafter: the “DPO”).

You may contact the DPO in all matters relating to the processing of your personal data and the exercise of your rights under data protection law.

Contact details of the DPO:

- by post: Data Protection Officer, Greek Trade Sp. z o.o., ul. Tadeusza Śliwiaka 14, 30-797 Kraków, Poland
- by e-mail: iod@greektrade.com.pl
- by telephone: +48 12 345 20 65

Purposes and legal bases for processing your personal data

Your personal data may be processed for the following purposes and on the following legal bases:

1. Responding to your enquiries and contacting you in matters for which you have contacted us, including via the contact form or by e-mail. Legal basis: legitimate interest of the Controller (Article 6(1)(f) GDPR), i.e. the need to provide a response.
2. Ongoing communication related to the performance of agreements between us and you or the entity you represent, including presenting offers, receiving orders, providing answers to queries. Legal basis: legitimate interest of the Controller (Article 6(1)(f) GDPR), i.e. the need for ongoing contact with contractors.
3. Performance of agreements concluded between us and you or the entity you represent (e.g., receiving and fulfilling orders, bookkeeping, accounting services, debt recovery). Legal bases:

- necessity for the performance of a contract or to take steps prior to entering into a contract (Article 6(1)(b) GDPR),
 - legitimate interest of the Controller (Article 6(1)(f) GDPR), i.e. proper performance of contracts.
4. Compliance with legal obligations imposed on us, particularly obligations under tax law. Legal basis: compliance with a legal obligation (Article 6(1)(c) GDPR).
 5. Establishment, exercise or defence of legal claims, whether on our side or yours. Legal basis: legitimate interest of the Controller (Article 6(1)(f) GDPR), i.e. the ability to pursue or defend claims.
 6. Ensuring the security of the use of our websites, adapting them to Users' needs, and carrying out marketing of our own goods and services. The legal basis for processing is the Controller's legitimate interest (Article 6(1)(f) GDPR), consisting in the need to ensure the secure use of the Website, provide convenient access to it, and offer our own goods and services to customers.

Recipients of personal data

We may share your personal data with external entities to which we outsource services related to personal data processing and with whom we have concluded data processing agreements.

These entities include providers of IT services, postal and courier operators, legal advisors, and auditors.

Your personal data will not be transferred to third countries outside the European Union.

Retention period for personal data

We will store your personal data for the period necessary to achieve the purposes indicated above.

Specifically:

1. If your personal data is processed in connection with the performance of a contract concluded with you or with the entity you represent, we will store it for the duration of the contract and, to the extent necessary, for a period of five years, counted from the end of the calendar year in which the deadline for payment of the tax due in connection with the conclusion and performance of the product sale agreement expired, or for a longer period if required by law or by the applicable limitation periods for claims arising from that agreement.
2. If you contacted us, your data will be processed for three years from the end of the contact.

3. If your data is processed based on your consent, it will be stored until you withdraw your consent.

After your personal data is no longer necessary for the purposes for which it was collected, it may be further processed solely for the purpose of establishing, exercising or defending legal claims, for the duration of relevant limitation periods.

Consequences of failing to provide personal data

Except where the provision of personal data is a legal requirement, providing your data is voluntary. However, failure to provide data may hinder or prevent the achievement of the purposes outlined above.

Your rights under the GDPR

We guarantee the exercise of all rights granted to you under the GDPR, including:

1. Right of access – to obtain information on how and to what extent your data is processed and access to your data.
2. Right to rectification – if your data is inaccurate or incomplete.
3. Right to erasure (“right to be forgotten”), in particular when:
 - a) the data is no longer necessary for the purposes for which it was collected;
 - b) you withdraw your consent;
 - c) you object and there are no overriding legitimate grounds for processing;
 - d) the data is processed unlawfully;
 - e) the data must be erased to comply with a legal obligation.
4. Right to restriction of processing, e.g.:
 - a) when you contest the accuracy of the data;
 - b) when processing is unlawful but you oppose erasure;
 - c) when the data is no longer required by us but is needed by you for legal claims;
 - d) when you object to processing – until the balance of interests is assessed.
5. Right to object to processing based on our legitimate interests, on grounds relating to your particular situation.
6. Right to withdraw consent at any time (withdrawal does not affect processing carried out before withdrawal).
7. Where the processing of your personal data is based on:
 - a) your consent, or

b) is necessary for the performance of a contract concluded with you, or
c) is necessary in order to take steps at your request prior to entering into a contract, or
d) is carried out by automated means,
you have the right to receive your personal data from us in a structured, commonly used and machine-readable electronic format (e.g. a .pdf file). You may transmit this data to another controller or request that we transmit it to another controller on your behalf. We will do so only where such transmission is technically feasible.

8. You have the right to lodge a complaint regarding the processing of your personal data by us with the supervisory authority, i.e. the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych), ul. Stawki 2, 00-193 Warsaw, Poland.

Automated decision-making

Your personal data may be processed by automated means; however, such processing will not result in any legal effects concerning you or significantly affect your situation. We do not use profiling. To exercise the above rights, please contact us or our Data Protection Officer. The relevant contact details are provided above.

COOKIES

What are cookies?

Cookies are IT data stored on Users' end devices, intended to facilitate the use of websites. They are text files containing the name of the website, the storage duration, and a unique identifier. Cookies provide statistical information on User traffic, activity, and Website usage, allowing us to tailor content and services to user preferences.

The term "cookie" refers to cookies and other similar tools described in Directive 2009/136/EC of the European Parliament concerning the processing of personal data and the protection of privacy in the electronic communications sector (the ePrivacy Directive), as well as in Article 173 of the Telecommunications Law.

What are cookies used for?

In connection with our use of cookies, we provide below the most important information regarding their purpose and application.

1. Cookies are not used to collect any information about Users other than their behaviour on the Website.
2. Cookies enhance the functionality of the Website, including:

- enabling Users to log in and maintain their session across subsequent pages of the Website, so that, for example, the User does not have to enter their login and password on each subpage; tailoring Website content to User preferences;
 - tailoring the Website's content to the User's preferences by means of cookies that recognise the User's device and display the Website accordingly;
 - creating statistics that help us understand how Users make use of the Website, which in turn enables us to improve its content and functionality;
 - adjusting advertising content through remarketing (e.g., Google Analytics, Meta Ads, TikTok Ads).
3. The Website uses two main types of cookies:
- a) "session cookies": Session cookies are temporary files which are stored on the User's end device until they log out, leave the website, or close their web browser;
 - b) "persistent cookies": Persistent cookies are stored on the User's end device for the period specified in the cookie parameters, or until they are deleted by the User.
4. The Website uses the following categories of cookies:
- a) "necessary" cookies, which enable the use of the Website's functionalities; for example, services requiring authentication within the Website require the use of authentication cookies.
 - b) security cookies, used to ensure security, e.g. to detect misuse of authentication within the Website.
 - c) "performance" cookies, which allow the collection of information on how the Website is used.
 - d) "functional" cookies, which enable the storage of User-selected settings and the personalisation of the User interface, for example by remembering the User's chosen language, region, font, or the appearance of the Website.
 - e) "advertising" cookies, which are used to deliver personalised advertisements to Users based on the websites they previously visited, as well as to analyse the effectiveness of advertising campaigns.

How to block cookies

Users may change cookie settings at any time via the "Adjust consent preferences" window on the Website or through browser settings, including disabling certain types of cookies.

Disabling cookies may affect some functionalities of the Website.

Cookies placed on the User's device may also be used by partners cooperating with the Website operator.