

## Privacy Policy – Ultinon Motion Poland S.A. profiles in social media

### Part I – General provisions

#### § 1

##### Administrator

1. The administrator of your personal data is us, i.e. Ultinon Motion Poland S.A. based in Pabianice. Further in the Privacy Policy, we refer to ourselves as "Administrator" or "We".
2. Our registration files are kept by the District Court for Łódź-Śródmieście in Łódź, 20th Commercial Division of the National Court Register. We are entered in the register of entrepreneurs of the National Court Register under the number 60888. Our Tax Number is 764-000-14-43. Our share capital amounts to PLN 40,614,299. Our files contain the most important information about us, e.g. financial statements and the articles of association of our company.
3. You can contact us:
  - a. by letter: Partyzancka 66/72, 95-200 Pabianice,
  - b. by e-mail: [Dane.osobowe@ultinon-motion.com](mailto:Dane.osobowe@ultinon-motion.com)

#### § 2

##### Terms used in the Privacy Policy

If you notice one of the following terms written with a capital letter later in our Privacy Policy, you should understand them in accordance with the definitions below:

- a. **"Policy"** - means this document, i.e. the privacy policy you are reading,
- b. **"GDPR"** - 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. You can find the text of the GDPR [here](#),
- c. **"Social media"** - the social networking site we use, i.e. Facebook.

#### § 3

##### Your rights regarding personal data

1. We process your personal data, therefore:
  - a. you have the right to access your personal data,
  - b. you can correct them,
  - c. you can request the deletion of your personal data if the GDPR allows it,
  - d. you have the right to limit processing to the extent specified in the GDPR.
2. In parts II and III of the Policy, you will find information about additional rights. In some situations, you will have additional options.
3. Do you want to exercise your rights or learn more about them? Contact us. Our contact details can be found in § 1 section 3 of this Policy.

## § 4

### The right to object

1. After providing us with your personal data or if we collect it ourselves, you can exercise your right to object. You have it in two situations when we process your personal data:
  - a. for direct marketing purposes; you do not have to justify such an objection;
  - b. based on our other legitimate interests; such an objection must be justified by your particular situation. Tell us why we should not process your data.
2. Do you want to exercise your right to object? Contact us. Our contact details can be found in § 1 section 3 of this Policy.

## § 5

### Complaint to the President of the Personal Data Protection Office

If you believe that we are processing your personal data unlawfully, you can lodge a complaint with the supervisory authority. In Poland, it is the President of the Personal Data Protection Office, and its website is available at: <https://uodo.gov.pl/>

## § 6

### Personal data security

We use technical measures required by current provisions on the protection of personal data to prevent unauthorized persons from obtaining and modifying personal data sent electronically, i.e. within our Store.

## § 7

### Threats

We would like to point out that the threats related to the use of social media include: malware, spyware, information phishing by impersonating trustworthy entities (so-called phishing), hacker activities aimed at breaking into IT systems.

## § 8

### Questions about the Policy and where it is published

If you have any questions about the Policy, please let us know.

## Part II – our social media profiles

## § 9

### Using our social media profiles

If you use our social media profile, please pay attention to the following:

- a. For what purpose and on what legal basis do we process your personal data?

Purpose of processing	Legal basis for processing
Replying to private messages you send to us.  <u>Example:</u> We will respond to messages you send to us using tools available in social media, e.g. private messages.	The legal basis for the processing of your personal data for this purpose is our legitimate interest, i.e. Art. 6 section 1 letter f GDPR.  <u>Our legitimate interest is:</u> Resolving your case and responding to your message.

<p>Conducting discussions with you in the comments under individual posts.</p> <p><u>Example:</u> If you comment on our post or tag us in a discussion, we will most likely respond to your message. We will then see the name of your account on a given social networking site and your profile photo. If your comment violates the law, e.g. you defame another user, we will delete your comment.</p>	<p>The legal basis for the processing of your personal data for this purpose is our legitimate interest, i.e. Art. 6 section 1 letter f GDPR.</p> <p><u>Our legitimate interest is:</u> Conducting discussions with users who comment on our posts on social media or tag us in discussions there.</p>
<p>Statistical purpose, which involves social media providers presenting us with data on the views of our posts, their reach, the number of interactions, and the demographic data of our followers.</p> <p>The data presented to us by social media providers is statistical data, but is created on the basis of the company's observation of your behavior on our profile.</p> <p><u>Example:</u> We will obtain information from social media providers about what hours and days the largest number of our followers are logged in to a given portal.</p>	<p>The legal basis for the processing of your personal data for this purpose is our legitimate interest, i.e. Art. 6 section 1 letter f GDPR.</p> <p><u>Our legitimate interest is:</u> Obtaining knowledge about users who follow our social media profiles and interact with our posts. This allows us to optimize our communication methods, including matching them to the average age of our followers or selecting optimal times for publishing posts.</p>
<p>Marketing purpose consisting in informing about the use of our products and about ourselves through posts that we place on our profiles, including sponsored posts that are displayed to a wider group of social media users.</p> <p><u>Example:</u> Within this framework, we may display information relating to our brand to you.</p>	<p>The legal basis for the processing of your personal data for this purpose is our legitimate interest, i.e. Art. 6 section 1 letter f GDPR.</p> <p><u>Our legitimate interest is:</u> Conducting our marketing.</p>

**b. How long will we process your data?**

For the time needed to carry out the activities described above, i.e. replying to your messages, conducting discussions in social media and achieving the above marketing and statistical purposes. However, we will not process your personal data longer than until you object.

**c. What are your rights?**

We described them in § 3 and 4 of this Policy.

**d. Do you have to provide us with your data?**

This is voluntary. However, due to the rules applied by Social Media, we will see your name and surname or nickname and photo if you write to us or comment on our post.

- 1) Who will we transfer your data to? Social media providers, i.e. Meta Platforms Ireland Limited,
- 2) The entity handling our social media profiles.

e. Will we transfer your personal data outside the European Economic Area?

Your personal data will be transferred to the United States on the basis of the decision of the European Commission of July 10, 2023, issued pursuant to the regulation of the European Parliament and of the Council (EU), stating the adequate level of personal data protection provided under EU-US data protection. You can obtain a copy of your personal data that we transfer outside the European Economic Area at any time. To do this, please contact us.

f. Will automated decisions be made based on your data, including profiling?

NO.