

PRIVACY POLICY OF
WWW.CHOPINWATCHES.COM
ONLINE SHOP

I. **Definitions**

Following terms used in this Policy shall have the meaning ascribed to them below:

1. **Company** – means the company Błonie Sp. z o.o. with its registered seat in Warsaw, address: ul. Górnośląska 5, 00- Warsaw, Poland, entered into the register of entrepreneurs of the National Court Register maintained by the District Court for the capital city of Warsaw in Warsaw, XII Commercial Division of National Court Register, KRS no. 0000514611, REGON (statistical no.) 147275361, NIP (tax no.) 7010430409, share capital PLN 100,000.00.
2. **Personal data** – means any information relating to an identified or identifiable natural person.
3. **We, us, our** etc. – refer to the Company.
4. **Policy** – means the present Privacy policy.
5. **GDPR** – means 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) (OJ L 119, p. 1).
6. **Shop** – means online shop run by the Company at www.chopinwatches.com
7. **Product** – means the product promoted by the Company in the Shop which can be the subject of a sale contract.

II. **The aim of Policy and indication of controller**

1. This Policy sets terms under which we process your personal data that we have obtained through Shop.
2. The Company is a controller of your personal data within the meaning of Article 4(7) of GDPR.

III. **Your personal data and purposes of the processing for which they are intended**

1. We collect and process only those personal data, processing of which is connected to the use of Shop services, i.e. which is justified by at least one of purposes described below, and only provided that adequate legal basis for such processing out of the following exists:
 1. processing is **necessary for conclusion** at your request **and performance of a sales contract of the Product** and/or in order to take other steps at your request prior to entering into such contract, including in particular answering your questions, making reservation of a Product or placing an order thereof, etc.
legal basis: Article 6(1)(b) of GDPR
 2. processing takes place **with your explicit consent** given by ticking appropriate boxes at Shop's website, what in particular refers to processing of your e-mail address and phone number with a view to obtain from us commercial information, including newsletters, as well as personal data you voluntarily provided us with other than necessary for performance of a sales contract of the Product.
legal basis: Article 6(1)(a) of GDPR

3. processing is **necessary for compliance with a legal obligation to which the Company is subject**, i.e. keeping documentation of accounting records confirming commercial transactions carried out with you and disclosing such documentation to competent public authorities and informing on amendments to the Policy.
legal basis: Article 6(1)(c) of GDPR
4. processing is necessary for the **purposes of the legitimate interests pursued by the Company controller**, i.e. it is carried out in order to adopt measures aiming at improvement of functionality of services provided online through the Shop by the Company and to facilitate the use thereof, including adapting Shop to client's preferences, as well as to establish, exercise and execute legal claims or defend therefrom, including judicial and other proceedings.
legal basis: Article 6(1)(f) of GDPR
2. Providing personal data is voluntarily. However, refusal to provide personal data will prevent us from contacting you and preclude you from sending us inquiries (in case of contacting us through contact form). Therefore, we won't be able to conclude a sales contract of the Product and realization of your order.
3. We process your personal data as follows:
 1. contact data (necessary for provision of electronic services):
 1. e-mail address,
 2. phone number;
 2. address data for Product's shipping and issuance of invoice:
 1. name,
 2. address (street, home/flat number, postal code, city/town, country),
 3. phone number,
 4. business name and tax number – in case of entrepreneurs;
 3. data pertaining to bank account you provide us with at the moment of payment for Product.
4. While you use Shop's website we can also gather other information, such as in particular:
 1. IP address of your device or IP address of Internet provider,
 2. domain name,
 3. internet browser type you are using,
 4. access time,
 5. operating system type your device uses,
 6. navigation data, i.e. information on links and references on Shop's website you click on.

IV. Mode and place of processing your personal data

1. We do respect your privacy and therefore we process your personal data with utmost care and in accordance with applicable provisions of law, in particular with conditions laid down in GDPR.
2. Appropriate technical and organisational measures to ensure secure processing of your personal data are implemented in the Company.

3. We process your personal mainly within the territory of Poland (in Company's registered seat and in other places where the Company runs its business activity or where such activity is run by entities cooperating with the Company which are involved in your personal data processing under specific legal basis). Your personal data may be transferred also to other countries of European Economic Area and third countries which ensure the adequate level of protection of personal data.
4. We use „cookies" files, what means that we introduce safe files to the system you are using which gather information enabling us to customize our services and Products to individual needs of persons who visit the Shop, as well as enable us to prepare visitor statistics. You can delete "cookies" files at any time using functions available in your internet browser you are using. Also you can use your internet browser to change settings of "cookies" files on your own. However, we point out that restrictions regarding "cookies" files may affect some functionalities of the Shop. Detailed information on possibilities and ways of managing "cookies" files are available in the settings of your internet browser.

V. Your rights and how to exercise them

1. You have the right to:
 1. obtain our confirmation whether we processed your personal data and if it applies – also to obtain access to them and any other information regulated by law, including GDPR;
 2. withdraw your consent for processing of your personal data at any time; however, such request is effective as of the date of consent withdrawal and it doesn't affect processing carried out legitimately before the consent withdrawal;
 3. request to obtain from us without undue delay the rectification of your inaccurate personal data, including your right to have incomplete personal data completed;
 4. obtain from us the erasure of all your personal data or some of them without undue delay and we are obliged to erase them without undue delay where one of the grounds stipulated in Article 17(1) of GDPR ("right to be forgotten") applies, i.e. in particular when:
 1. your personal data are no longer necessary for us in relation to the purposes for which they were collected or otherwise processed,
 2. you have withdrawn your consent and there is no other legal ground for the processing,
 3. you have objected to our processing of your personal data on the basis of legal grounds referred to in section 3.1.4. above, and there are no overriding legitimate grounds for the processing;
 4. you have objected to our processing of your personal data for direct marketing purposes (to the extent the processing is related to such direct marketing);
 5. your personal data have been unlawfully processed;
 6. your personal data have to be erased for compliance with a legal obligation in Polish or European Union law;
5. obtain from us restriction of processing of your personal data where any case determined in Article 18(1) GDPR applies, i.e. where:
 1. you contest the accuracy of your personal data – for a period enabling us to verify the accuracy of such data,

2. the processing is unlawful and you oppose the erasure of your personal data and request the restriction of their use instead,
 3. we no longer need your personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims,
 4. you have objected to our processing of your personal data on the basis of legal grounds referred to in section 3.1.4. above – pending the verification whether our legitimate grounds override those of you;
 6. portability of your personal data;
 7. object at any time to processing of your personal data on grounds relating to your particular situation in accordance with Article 21(1) or 21(2) of GDPR;
 8. lodge a complaint with a supervisory authority, i.e. to President of the Personal Data Protection Office, ul. Stawki 2, 00-193 Warsaw, Poland.
2. Requests concerning exercising of your rights can be filed by ways of contact chosen freely by you out of ones indicated in section VIII below.
 3. Immediately after the receipt of your request we will analyse it and we will adopt relevant measures in order to agree to justified request or to reject the one which is groundless, provided that requirements for such rejection are met. In particular we will conduct explanatory activities and contact you in order to determine what kind of right and to what extent you wish to exercise, as well as which information you would like to acquire from us. Subsequently, without undue delay we will respond you and give you information how your request had been recognised.
 4. We recognise requests within one month of receipt thereof. However, we are entitled to extend that period by two further months where necessary, taking into account the complexity and number of the requests. In such a case we will inform you of any such extension within one month of receipt of the request, together with the reasons for the delay.
 5. In case it is clear from request's contents that that request haven't been filed by data subject, then we demand from the person who filed such request to submit relevant power of attorney, otherwise the request may be rejected.

VI. Retention time

We store your personal data for no longer than is necessary for the purposes for which they are processed.

1. Personal data obtained for the performance of a contract and taking other steps prior to entering into it are stored as long as it is essential for the performance of a contract (see section 3.1.1. above) and then for the period equivalent to period of:
 1. limitation of claims (see section 3.1.4. above) which lasts 6 years (as a rule) or
 2. keeping documentation of accounting records and limitation of tax obligations (see section 3.1.3. above) which lasts 5 years calculated from the beginning of a year following the year when the sale took place (as a rule)

- whichever of those periods elapse later.
2. Personal data processed on the basis of your consent (see section 3.1.2. above) are processed until the withdrawal of your consent and then for the period equivalent to period of limitation of claims (see section 3.1.4. above) which lasts 6 years as a rule.

VII. Recipients of the personal data

We disclose your personal data to our service providers which we use in order to run the Shop, including purposes of production and sale of Products, such as providers of hosting, IT, accounting, marketing, legal, bank and courier services.

VIII. Contact us

You can contact us on issues pertaining to the processing of your personal data as follows:

1. through the contact form on Shop's website,
2. by e-mail to contact@chopinwatches.com,
3. by mail to the Company's address, i.e.:
ul. Górnośląska 5, 00- 443 Warsaw, Poland
(with a note „personal data”).

IX. Final provisions

1. The Company is entitled to amend the Policy. The new wording of the Policy will be available on Shop's website. In case the amendment of the Policy takes place within the period where your personal data are processed by us, then you will be additionally informed about implemented changes by e-mail.
2. The Policy is available on Shop's website at www.chopinwatches.com throughout the whole term when it is applicable.
3. Date of the last Policy's update: 25 April 2019.