

PRIVACY AND COOKIES POLICY FOR THE LASPA ONLINE STORE

OVERVIEW OF OUR PRIVACY POLICY

WHO ARE WE?

We are **Arges Gerard Szwarczyński**, a company operating the Laspa online store, available at www.laspa24.com. We are responsible for how we use and protect the personal data of Platform Users.

WHAT DO WE USE USER DATA FOR?

We will use User data (obtained online) to, among other things, manage their registration, handle product or service purchases, respond to inquiries, and—if the User wishes—to send notifications and offers tailored to their individual needs. This includes considering the User's geographical location and price preferences. The data will also be used to analyze User behavior to optimize the store's functionality.

WHY DO WE USE IT?

We have the right to process data for several reasons. The most important is the need to process it to **fulfill the contract** that the User accepts when they register on our site or make a purchase. We also process data to handle inquiries or send Newsletters and SMS messages, for which the User has given consent. Data processing for analytical purposes and offer customization is based on our **legitimate interest**.

TO WHOM DO WE SHARE USER DATA?

We will share User data with our cooperating service providers with whom we have signed agreements, including technology, payment, analytical, and geolocation service providers.

USER RIGHTS

The User has the right to **access** their data, **rectify** or **delete** it. In some cases, they also have other rights, such as the right to **object** to the use of their data or to its **portability**, which we explain in detail below.

We encourage you to read the entire Privacy and Cookies Policy below to fully understand how we will use your personal data and to learn about your rights.

BEFORE YOU START...

In this Privacy and Cookies Policy, the User will find all important information regarding our use of their personal data, regardless of the channel through which they interact with us.

We are transparent about the use of personal data so that the User is aware of the consequences associated with its processing and their rights. This policy is permanently available on the online store's website at www.laspa24.com.

The term "**Platform**" refers generally to the Laspa online store available at www.laspa24.com.

1. WHO IS RESPONSIBLE FOR PROCESSING USER DATA?

The entity responsible for processing User data is:

Arges Gerard Szwarczyński

with its registered office in Mieroszów (ul. Leśna 4, 58-350 Mieroszów)

Tax ID (NIP): PL8862038542

BDO registration number: 000108122

Email address for data protection matters: biuro@laspa24.com

2. FOR WHAT PURPOSE DO WE PROCESS USER PERSONAL DATA?

Depending on the service chosen, we will need different data. Generally, depending on the situation, this includes:

- Data allowing User identification (e.g., name, surname, email address, contact details, delivery address);
- Financial and transactional information (e.g., payment details, information about purchases, orders, returns);
- Connection, geolocation, and browsing data (e.g., IP address, device ID, geographical location data);
- Commercial information (e.g., whether the User is subscribed to the Newsletter or SMS Club);
- Data regarding the User's tastes and preferences.

Please remember that if we ask you to provide your personal data to access any of our services, some fields may be marked as **mandatory**, as they are essential for us to provide those services. If you choose not to provide this data, you may not be able to register as a User or use those services.

In other cases, we may collect information passively, using tracking tools such as browser cookies and other similar technologies.

Depending on how the User uses our Platform, we will process their personal data for the following purposes:

2.1 Managing Platform User registration

If the User decides to register, we will need to process their data to identify them and grant them access to the specific features, products, and services available to registered Users. The User's account can be closed at any time by contacting us at: biuro@laspa24.com.

2.2 Development, implementation, and execution of a sales or service contract

Data is processed to:

- Contact the User to provide information related to their orders.
- Manage payments for purchased products.
- Implement mechanisms to prevent unauthorized use of the Platform and abuses.
- Manage returns, exchanges, and inquiries about item availability.
- Issue receipts and invoices for purchases.
- Enable the use of other available features.

Offer and price customization based on geolocation: We process geolocation data (e.g., IP address) to determine the country from which the User is accessing the Platform. Based on this information, we can adjust the displayed prices (e.g., currency, price levels) and product offers. For this purpose, we use external geolocation service providers: ipdata.com, getgeoapi.com, ipinfo.io.

2.3 Handling requests and inquiries submitted via Customer Service channels

We process only the personal data that is absolutely necessary to manage or resolve requests and inquiries. Contact is possible via mail, email: biuro@laspa24.com, or phone: **+48 74 845 82 53**. Users can also use the contact form on the Store's website.

Please be aware that when using the **Chatbot**, an automatic chat feature, its operation is based on services provided by **Google** (including Dialogflow). When using the Chatbot, the User's personal data may be transferred directly to Google as a separate data controller, in accordance with Google's privacy policy.

2.4 Marketing purposes

Data is processed to:

- **Personalize services and suggest recommended products** based on interactions with our Platform and an analysis of the User's profile, including geolocation data.
- **Newsletter and SMS Club:** If the User signs up to receive our Newsletter or join the SMS Club, we will process their personal data (email address for the Newsletter, phone number for the SMS Club) to manage their subscription and send information about our products or services. The User can unsubscribe from these services at any time free of charge.
- **Conduct promotional activities** (e.g., contests).

2.5 Analysis of usability and quality to improve our services

When using our Platform, we will process the User's browsing data for analytical and statistical purposes to make improvements to the services we offer.

For this purpose, we use analytical tools such as **Hotjar** to create click maps and session recordings. Hotjar helps us visualize how Users interact with the Platform's elements. This information is processed in an anonymized or pseudonymized manner, minimizing the risk of User identification.

2.6 Fraud detection and prevention and compliance with legal obligations

We may process User data to comply with any applicable legal obligations and to prevent fraud and other abuses.

3. WHAT IS THE LEGAL BASIS FOR PROCESSING USER DATA?

Purpose	Legal Basis
Managing Platform User registration	Data processing is necessary for the performance of the User Account service agreement.
Development, implementation, and execution of a sales or service contract (including offer and price customization)	Data processing is necessary for the performance of the sales contract. Regarding offer and price customization based on geolocation, processing is based on our legitimate interest .
Handling requests and inquiries submitted via Customer Service channels	We process data based on our legitimate interest . When a request concerns the exercise of rights or a complaint, processing is carried out as part of our legal obligations .
Marketing purposes	The legal basis is the User's consent (Newsletter, SMS Club). To offer personalized

	services, we believe we have a legitimate interest in creating a User profile.
Analysis of usability and quality to improve our services (including Hotjar)	Processing is based on our legitimate interest in improving the User's experience and the quality of our services.
Fraud detection and prevention and compliance with legal obligations	Processing is based on our legitimate interest in preventing fraud and on the legal obligation to comply with applicable laws.

4. HOW LONG DO WE STORE USER DATA?

The data storage period depends on the purposes for which it is processed:

Purpose	Storage Period
Managing Platform User registration	Until the User decides to unregister.
Development, implementation, and execution of a sales or service contract	For the time necessary to manage the purchase, including returns and complaints.
Handling requests and inquiries submitted via Customer Service channels	For the time necessary to fulfill the request, and also for the period specified by law.
Marketing purposes	Until the User withdraws consent to receive marketing communications.
Analysis of usability and quality	Only for the duration of a specific analytical activity or until the data is anonymized.

Fraud detection and prevention and compliance with legal obligations	For the period necessary to achieve the purpose and resulting from legal regulations.
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After the expiration of the statute of limitations for any claims, we will proceed to delete the User's personal data.

5. SHARING PERSONAL DATA WITH THIRD PARTIES

To achieve the purposes listed in this Policy, we will share the User's personal data with third parties who support us in providing our services. The categories of these entities are:

- Financial institutions (e.g., Przelewy24, Klarna, PayPal, PayPo);
- Technology and analytical service providers (e.g., Hotjar, Google);
- Logistics, transport, and delivery service providers and partners;
- Customer service providers (e.g., within the Chatbot - Google);
- Marketing and advertising service providers and partners;
- Public authorities, to the extent required by law.

Specific geolocation service providers:

To customize offers and prices based on geolocation, we use external providers:

- **ipdata.com**
- **getgeoapi.com**
- **ipinfo.io**

Specific analytical tool providers:

To analyze website usability and improve User experience, we use:

- **Hotjar** (enabling the creation of click maps and session recordings).

To ensure the greatest possible effectiveness of our service, some of these service providers may be based in countries outside the European Economic Area. In such cases, we transfer data with appropriate safeguards and always with the assurance of data security, using the most suitable tools for international data transfer, such as **Standard Contractual Clauses**.

6. WHAT RIGHTS DOES THE USER HAVE AFTER SHARING THEIR DATA WITH US?

We are committed to respecting the confidentiality of the User's personal data and guaranteeing their ability to exercise their rights. The User can exercise them free of charge by sending a request via email to: **biuro@laspa24.com**.

If we deem it necessary, we may request a copy of an identity document.

Regardless of the purpose of processing personal data, the User has the right to:

- **Request access** to the data we hold about them.
- **Request rectification** of the data.
- **Request deletion** of their data if it is no longer needed for the purposes for which it was processed.
- **Request restriction** of the processing of their data.
- **Withdraw consent** to data processing at any time.
- **Request data portability** if the legal basis for processing is consent or contract performance.
- **Object** to data processing if it is based on our legitimate interest.

We also inform Users of their right to file a **complaint** with the supervisory authorities regarding personal data protection, specifically with the President of the Personal Data Protection Office (UODO).

7. WHAT HAPPENS WHEN A USER SHARES THIRD-PARTY DATA WITH US, OR A THIRD PARTY PROVIDES US WITH THE USER'S DATA?

If a User shares a third party's personal data with us, it means that the User has informed the third party about the purposes and methods of processing their data.

If a third party has provided us with the User's data or the User themselves has provided their data as a result of a feature or service requested by another User, this data will be used to perform that specific function or service, in accordance with the limitations set out in this Privacy Policy.

8. CHANGES TO THE PRIVACY AND COOKIES POLICY

The information contained in this Policy may change. If we make any changes, we will inform Users via the Platform. A User with an Account or who uses the Newsletter/SMS Club services will be notified of the change via email or SMS. We recommend that Users regularly check this Policy.

9. INFORMATION ABOUT COOKIES

We use cookies and other similar mechanisms to facilitate the use of the Platform, to understand how Users interact with it, and, in some cases, to display advertisements tailored to their habits. Cookies are essential for facilitating navigation and improving our services.

9.1 What is a cookie?

A cookie is a small text file that a website or other platform stores on a computer, tablet, smartphone, or other similar device, containing information about the User's browsing or use of certain content.

9.2 What types of cookies are there?

Depending on the owner:

- **First-party cookies:** Sent from our domain.
- **Third-party cookies:** Sent from a domain that is not managed by us but by another entity.

Depending on the purpose:

- **Essential (technical) cookies:** Enabling navigation on the site and the use of services (e.g., payment management).
- **Functional cookies:** Allowing for personalization (e.g., remembering language or currency).
- **Analytical cookies:** Allowing for a statistical analysis of Platform usage. This category includes cookies used by **Hotjar** to collect data for click maps and session recordings.
- **Behavioral (advertising) cookies:** Storing information about User behavior to display personalized advertisements.

9.3 What are cookies used for on our Platform?

The main purpose of our cookies is to ensure a more comfortable and efficient browsing experience. They serve to remember your preferences (language, country, currency, etc.) and to continuously improve our services and Platform, as well as to offer personalized advertisements.

We never store sensitive information in the cookies we use, such as passwords, credit or debit card data.

9.4 How can I manage the use of cookies on this Platform?

A cookie configuration panel will be available on our Platform at all times. The User can manage the activation and deactivation of those cookies that are not absolutely essential for the Platform's operation.

The User can also disable the use of cookies in their browser, including third-party cookies they have previously accepted and now wish to reject. Information on how to manage cookies in the most popular browsers is usually available on their respective websites (e.g., Google Chrome, Mozilla Firefox, Opera, Apple Safari).

9.5 Who uses the information stored in cookies?

The information stored in our Platform's cookies is used mainly by us, with the exception of those identified as "Third-party cookies," which are used and managed by external entities to provide us with services aimed at improving our services and the User's experience.

Among the third-party entities we allow to place cookies on our Platform are:

- **Google** (e.g., Google Analytics, services related to the Chatbot);
- **Hotjar**;
- Geolocation service providers (**ipdata.com**, **getgeoapi.com**, **ipinfo.io**).