

PRIVACY POLICY

1. This Privacy Policy informs how we process personal data, primarily: a) who is the Administrator of personal data; b) what types of data are processed; c) for what purpose and on what basis we process personal data; d) who is the recipient of personal data; e) how long we process personal data; f) what rights are available to individuals whose personal data we process.
2. The Administrator of personal data is JJPM sp. z o.o. with its registered office in Warsaw (formerly "JJ Management" limited liability company partnership) at ul. Rzeczycka 26, (04-940) Warsaw (hereinafter referred to as "JJPM", "Administrator" or "we", "our" used in various forms). Email address for contact with the Administrator: rodo@adbl.eu.
3. Our goal is to process personal data in accordance with the Act of 10 May 2018 on personal data protection (consolidated text Journal of Laws of 2019, item 1781) and the Regulation of the European Parliament and of the Council (EU) 2016/679 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 referred to as "GDPR"
4. This Privacy Policy concerns, in particular, the processing of personal data of the following categories of individuals:
 - a) JJPM customers, including persons purchasing ADBL brand products in the ADBL B2B online store operated by JJPM (hereinafter referred to as the "ADBL B2B Online Store"), participants in trainings organized by JJPM, and persons ordering the newsletter service;

b) individuals who contact us or with whom we contact in connection with cooperation between JJPM and these individuals or their employers/clients;

c) individuals who contact us regardless of whether they are our clients or cooperate with us in another way.

5. Categories of processed personal data (although not all of the following categories of personal data are always processed in individual cases):

a) first name and last name;

b) company;

c) address;

d) position;

e) email address;

f) phone number;

g) other data provided in connection with contact.

6. Personal data is processed:

a) on the basis of Article 6(1)(a) of the GDPR in the following cases, which are also the purposes of the processing:

- provision of the newsletter sending service;
- use of participants' image for informational and promotional purposes in training;
- marketing of JJPM's own services and products provided electronically;

b) on the basis of Article 6(1)(b) of the GDPR in the following cases, which are also the purposes of the processing:

- contact with customers or other entities with whom JJPM cooperates in connection with the conclusion and performance of the concluded agreement; in the case of customers of the ADBL B2B Online Store, in particular for the purpose of:
 - registration of the Customer Account (as defined in the ADBL B2B Online Store Regulations) in the ADBL B2B Online Store;
 - ensuring customer service and account maintenance in the ADBL B2B Online Store;
 - for the purpose of fulfilling orders, concluding and performing sales agreements concluded through the ADBL B2B Online Store;
 - consideration of applications for the ADBL Family group on Facebook before joining the ADBL Family group;
 - contact with members of the ADBL Family group on Facebook;
 - consideration of complaints filed on the basis of the quality guarantee provided;
- c) on the basis of Article 6(1)(c) of the GDPR in the following cases, which are also the purposes of the processing:
- fulfilling legal and tax obligations imposed on JJPM;
 - consideration of complaints filed on the basis of the law on warranty for defects;
- d) on the basis of Article 6(1)(f) of the GDPR in the following cases, which are also the purposes of the processing:
- contact with representatives of customers or other entities with whom JJPM cooperates in connection with the performance of the concluded agreement or for the purpose of concluding an agreement;
 - pursuing potential claims;

- handling current correspondence;
- contact with an individual for a purpose other than those specified above in this point 6, e.g. responding to a request or a question for advice not related to agreements concluded by JJPM.

7. The recipients of personal data may be entities providing services to JJPM, including IT service providers, hosting services, financial and accounting services, advisory services, legal services, auditing services, courier and transportation companies, and other business partners, as well as, in cases provided for by law, public administration bodies.
8. In the case of orders for products or services of the Administrator originating from third countries and indicating the place of delivery in a third country, personal data may be transferred to a third country, as it is not possible to fulfill the order otherwise. The legal basis for the transfer of personal data to a third country in such a situation is Article 6(1)(b) of the GDPR (processing is necessary for the performance of a contract to which the data subject is party) and, provided that the transfer does not take place to such a third country for which the European Commission has found to provide an adequate level of protection - Article 49(1)(b) of the GDPR (the transfer is necessary for the performance of a contract between the data subject and JJPM).
9. Personal data will be processed:
 - a) on the basis of Article 6(1)(a) of the GDPR - until the consent given is withdrawn.

Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal;
 - b) on the basis of Article 6(1)(b) of the GDPR - for the duration of the contract, including the validity of quality guarantees, if applicable, and after its termination or expiration - until the

expiry of the limitation period for any claims arising from cooperation based on the contract;
in the case of an application of a candidate to the ADBL Family group - for a month from the submission of the application (in case of rejection of the candidacy);

c) on the basis of Article 6(1)(c) of the GDPR - until the expiry of the limitation period for tax obligations, and in the case of complaints filed under the law on warranty for defects - during the consideration of the complaint, and also after its consideration - until the expiry of the limitation period for any claims arising from that complaint;

d) on the basis of Article 6(1)(f) of the GDPR:

- in the case of contact with representatives of clients or other entities with which JJPM cooperates - for the duration of that cooperation, and after its termination - until the expiry of the limitation period for any claims arising from that cooperation;

- in the case of processing in connection with the enforcement of claims - for the duration of the consideration of the claim and the duration of any dispute related to the claim, and also until the expiry of the limitation period for that claim;

- in the case of contact taking place for another purpose - for the duration of the exchange of information related to that contact, and also after its conclusion - until the expiry of the limitation period for any claims arising from that contact.

10. The following rights are granted to individuals whose personal data is processed:

a) the right to access their data (Article 15 of the GDPR);

b) the right to rectification and completion of their data (Article 16 of the GDPR);

c) the right to erasure of their data (Article 17 of the GDPR);

d) the right to restriction of processing of their data (Article 18 of the GDPR);

e) the right to data portability (where the data is processed based on Article 6(1)(a) or (b) of the GDPR in an automated manner) (Article 20 of the GDPR);

f) the right to object to processing of their data (where the data is processed based on Article 6(1)(f) of the GDPR) (Article 21 of the GDPR);

g) the right to withdraw consent at any time (where the processing is based on consent) without affecting the lawfulness of processing based on consent before its withdrawal.

To exercise these rights, you can send a message to the email address: rodo@adbl.eu.

11. If the individual whose personal data is processed believes that JJPM is processing their personal data in violation of data protection laws, including the GDPR, they have the right to lodge a complaint with the President of the Personal Data Protection Office in Warsaw, ul. Stawki 2 (00-193 Warsaw).

12. Providing personal data is voluntary, but at the same time necessary, depending on the case, for:

a) receiving a newsletter (in relation to newsletter subscribers);

b) receiving information about products and services using electronic communication means;

c) receiving a response to a query, including, for example, a response to a reported complaint;

d) taking necessary actions to conclude an agreement;

e) performing a contract;

f) creating a customer account, placing an order, and concluding a sales contract in the ADBL B2B online store, and thus making purchases of goods offered by JJPM in the ADBL B2B online store.

Failure to provide personal data will result in the inability to take the appropriate actions mentioned above.

13. JJPM reserves the right to update the Privacy Policy without the obligation to inform customers and individuals whose personal data is processed, unless required by law. The current Privacy Policy is available on the website: <https://adbl.eu/>.