

# Privacy Policy

## I. General information

As we respect your privacy, we hereby make available this Privacy Policy so that each one of you knows in what scope your personal data are processed, what is the purpose of their collection, to whom they can be made available, how they are protected, and what rights you have in relation to this.

We wish to inform you that we make every effort and view it as our priority to process the data you provide to us in accordance with applicable legal provisions, in particular with the 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, GDPR).

This document and its contents refer to the website [www.soplica.pl](http://www.soplica.pl) (hereinafter: **Website**).

### 1. Who is the Data Controller?

The Data Controller of your personal data is CEDC International sp. z o.o., with its registered office in Oborniki (post code 64-600), Kowanowska 48 St., entered into the Register of Entrepreneurs of the National Court Register under the number KRS 0000051098, whose documentation is kept in the District Court in Poznań – Nowe Miasto and Wilda, Poznań, 9<sup>th</sup> Commercial Division of the National Court Register (hereinafter: **Data Controller**).

If you have any questions regarding the processing of your personal data, the Data Controller can be contacted by post at the above-mentioned address (please add the phrase “personal data” on the envelope) or by e-mail at [iod@cedc.com](mailto:iod@cedc.com).

### 2. What do we mean by „personal data”?

The personal data mentioned in this Privacy Policy are information relating to an identified or identifiable natural person to which they refer, i.e. one that can be identified directly or indirectly, in particular by an identifier such as a first name and surname, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### 3. Which data do we process?

In connection with the use of our Website, we process your data in the form of:

- a. IP address;
- b. cookies;
- c. your date of birth in order to confirm that you are of age.

## II. Scope of processing personal data

### 1. Cookies

We process cookies from the moment you visit our Website, of which we inform you by means of dedicated notices. These notices also allow you to choose what cookies we will process. By default, in accordance with the “privacy by default” and “privacy by design” rules, cookies are processed in the amount necessary for the correct functioning of the Website. Detailed information regarding cookies can be found further on in this document.

## 2. Date of birth

As the Website’s content centres on alcoholic beverages, we take care to make sure the audience are solely persons of age. We ask you to provide your date of birth in two instances: when you enter the Website and when you register an account. In both cases giving your date of birth is obligatory, and this information is processed only in order to confirm that you are not underage.

## III. Purpose and legal basis of processing

Your personal data will be processed for the purpose:

- a. of fulfilling our duties resulting from legal provisions, in particular in the scope of counteracting alcoholism – the legal basis is the necessity to fulfil the legal obligation resting on the Data Controller (Art. 6.1.c of the GDPR);
- b. connected with ICT security – the legal basis for processing is legitimate interest of the Data Controller consisting in keeping statistics and logs (including your device’s IP and connection date), as well as monitoring the behaviours of our visitors in order to ensure the security of the Website, including your data (Art. 6.1.f of the GDPR);
- c. necessary for the correct functioning and optimization of the Website – which is legitimate interest of the Data Controller (Art.6.1.f of the GDPR) consisting in raising the quality of offered services and increasing our customers’ satisfaction.

## IV. Data processing period

As a rule, the personal data are processed as long as the purpose of their processing remains valid, in accordance with the following:

- a. for purposes connected with ICT security – 3 months back;
- b. as regards particular cookies, the processing periods are presented in the following chapter;
- c. as regards your date of birth – 1 hour for persons visiting the Website and, in the case of registering an account, until the account is deleted.

## V. Cookies

### 1. General information

The Website uses cookies. We only store them on your device if you explicitly consent to this. This does not apply only to functional cookies, which are essential for ensuring the Website functions and is safe to use (“essential cookies”). You can give your consent by means of using the Website without changing the cookie settings, i.e. by clicking the “Accept and close” button. Please remember that the notice regarding cookies appears when you first visit our Website and remains visible until you accept the cookies or change the settings by clicking the “Cookie settings” button. Once you have made your choice, the notice will no longer appear, but you can go to the “Cookie settings” tab at any time to

make appropriate changes. By changing cookie settings it is possible to delete stored cookies (e.g. including the history of visited sites and cache files) or block the storing of new cookies. Depending on the settings chosen, you can block or delete all cookies except those which are essential for the functioning of the Website.

## 2. Essential cookies (functional cookies)

Some of the cookies we use are essential for the functioning of the Website and cannot be turned off as they enable users to navigate the Website and use it. As part of those cookies what is also stored are cookie settings defined by the user. We base this activity on the legitimate interest of the Data Controller consisting in the obligation to be accountable for held consents to process personal data, in accordance with Art. 6.1.f of the GDPR.

## 3. Third-party cookies

Some of the cookies we use give us with additional Website functionalities and are provided by third parties. The use of such cookies is described in points 4 and 5 below.

## 4. Analysis and effectiveness assessment (analytical cookies – additional)

We use the Google Analytics tool provided by Google Analytics Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. We carry out our activity in this scope on the basis of legitimate interest of the Data Controller consisting in the analysis of user behaviours on the Website in order to optimize it. You can object to this activity at any time by turning off Google Analytics cookies with the use of the tool available upon clicking the “Cookie settings” link, which can be found in the Website footer. By means of this tool we do not collect any data which make it possible to directly identify you. Analytical cookies allow us to collect information on the number of visits to our Website and their source, and are used in order to enhance the Website’s functioning. By visiting our Website for the first time, you decide to give consent to our using this tool. Please remember that you can change your decision at any time by going to the “Cookie settings” tab. Google Analytics automatically collects information about using the Website. Information collected in this way is usually transferred to Google servers in the United States. Due to the fact that we have activated IP address randomization, your IP address is shortened before it is passed on. The aim and extent of data collection and their further processing and use by Google’s controller, contact options, your rights in this scope, as well as the possibility of selecting settings ensuring the protection of your privacy have been described in Google’s privacy policy.

You can familiarize yourself with it at:

<https://support.google.com/analytics/answer/6004245>.

If you block these cookies, we will not have information regarding your visit to the Website and so we will not be able to use it to better its functioning.

## 5. Analysis and the possibility of customizing promotional activities (marketing cookies – additional)

We use the Meta Pixel (formerly Facebook Pixel) tool provided by Meta Platforms, Inc., 1601 Willow Road, Menlo Park, CA 94025, USA. We carry out our activity in this scope, i.e. in the scope of using the above-mentioned tool, on the basis of legitimate interest of the Data Controller consisting in the marketing of the Data Controller’s products or services.

In order to present you with marketing content personalised in regard to behaviours on our Website, we have implemented Pixel Meta, which automatically collects information on your use of our Website as regards the visited subpages. By means of this tool we do not collect any data which make it possible to directly identify you. Marketing cookies allow us only to collect information about users' activity on the Website, in particular as regards activity related to viewing the contents of a given subpage. You can object to this activity at any time by turning off marketing cookies with the use of the tool available upon clicking the "Cookie settings" link, which can be found in the Website footer. By visiting our Website for the first time, you decide to voluntarily consent to our using this tool as well as to the processing of the personal data collected in connection with its use. Please remember that you can change your decision at any time by going to the "Cookie settings" tab.

Please also be informed that Facebook can combine such collected information with other information about you it collects within the scope of your using the Facebook platform and can use it for purposes other than those of the Data Controller. We have no influence on such Facebook's actions.. We point out, however, that you can manage privacy settings from the level of your Facebook account. The aim and extent of data collection and their further processing and use by Meta Platforms, contact options, your rights in this scope, as well as the possibility of selecting settings ensuring the protection of your privacy have been described in Facebook's privacy policy.

You can familiarize yourself with it at: <https://free.facebook.com/privacy/policy/>.

#### Types of cookies processed:

Name	Type	Functions	Storing period	Is it obligatory?
<b>Essential cookies</b>				
AP_ALLOW	Essential cookies	This cookie stores the user's settings	does not expire	YES
AP_ANALYTICS	Essential cookies	This cookie stores the consent to use analytical cookies	does not expire	YES
AP_ADS	Essential cookies	This cookie stores consent to use marketing cookies	does not expire	YES
<b>Additional cookies – analysis and effectiveness assessment</b>				
_ga	Third-party cookies: Google Analytics	Makes it possible to track movement on the Website	2 years from setting or update	NO
_gat	Third-party cookies: Google Analytics	Makes it possible to track movement on the Website	2 years from setting or update	NO
_gid	Third-party cookies: Google Analytics	Makes it possible to differentiate users on the Website	24 hours	NO
<b>Additional cookies – marketing</b>				
_fbp	Third-party cookies: Meta Pixel	Set by Facebook to present advertisements (on Facebook or in an advertising network)	3 months	NO

usida	Third-party cookies: Meta Pixel	Set by Facebook, used by means of collecting a combination of the user's browser and a unique identifier in order to customize advertisements vis-à-vis users	until the end of the session	NO
datr	Third-party cookies: Meta Pixel	Set by Facebook, used by means of identifying the browser used to connect with Facebook in order to provide security	2 years from setting or update	NO

More information regarding `_ga`, `_gid` and `_gat` cookies can be found at:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>.

More information regarding `_fbp`, `usida` and `datr` cookies can be found at:

<https://www.facebook.com/business/help/742478679120153?id=1205376682832142>.

## VI. Profiling

The personal data processed by us will not be subject to automated decision-making, including profiling.

## VII. Data sharing

In order to ensure the proper functioning of the Website and services provided under the agreement, your personal data can be transferred to third parties acting on behalf of the Data Controller, i.e. IT providers providing services in connection with the Website's functioning.

Additionally, your personal data can be shared with entities authorized to receive them, including the appropriate judicial and law-enforcement authorities, in a manner compatible with and on the basis of applicable legal regulations.

Please be informed that your personal data will not be shared by the Data Controller outside the European Economic Area or with international organizations.

## VIII. Rights of the data subjects

1. Each person whose personal data is processed by the Data Controller in connection with use of the Website is entitled to:

- a. require access to the content of your personal data, rectification, erasure, restriction of processing;
- b. object to personal data processing;
- c. withdraw consent to personal data processing for the purpose(s) for which the consent was granted, at any time, without affecting the lawfulness of processing based on the consent before its withdrawal;
- d. portability of personal data.

2. In order to exercise the above rights, please contact the Data Controller in a manner described in Art. I.1 of this Policy.

4. If you believe we are infringing your rights or that a personal data breach has occurred, you have the right to file a complaint with regard to the processing of personal data with a supervisory authority, being in Poland, the President of the Personal Data Protection Office, 00-193 Warsaw, Stawki 2 St.

## IX. Freedom of choice regarding data provision

It is your choice to provide us with your personal data, however their provision is necessary for the purposes for which they are processed.

## X. Data security

In order to ensure a high level of security as regards using the Website, in particular in the scope of personal data, the Data Controller has implemented, maintains and monitors on an ongoing basis technical and organizational measures which minimize the risk connected with losing the confidentiality, integrity and availability of the provided data. This is carried out by means of:

- a. implementing internal policies and procedures in the scope of information security protection, including the protection of personal data;
- b. carrying out internal trainings which raise awareness of person who has access to the data;
- c. using only proven external providers;
- d. implementing appropriate tools which encrypt data transmission and guarantee safety from viruses;
- e. using a number of measures protecting from unauthorised access;
- f. regular testing and assessment of used technical and organizational measures meant to ensure processing security;
- g. periodic audits.

If you suspect information security has been breached, please promptly contact the Data Controller at [kontaktsoplica@soplica.pl](mailto:kontaktsoplica@soplica.pl).

## XI. Final provisions

1. The Data Controller reserves the right to amend the Privacy Policy if business conditions change or in order to adapt it to changes in legal provisions.
2. Any questions regarding the Privacy Policy and personal data protection should be sent by e-mail to: [kontaktsoplica@soplica.pl](mailto:kontaktsoplica@soplica.pl) or by post to: CEDC International sp. z o.o 64-600 Oborniki, Kowanowska 48 St. (please add the phrase “personal data” on the envelope).