

## Privacy Policy

In fulfillment of the information obligation set out in 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, hereinafter: "GDPR"), the Data Controller hereby informs that:

### **The Data Controller of personal data of users of *Business the arab way* is:**

Agnieszka Klimczak, conducting business activity under the name "Iddeni by Agnieszka Klimczak," with its registered office in Gdańsk, ul. Jelitkowski Dwór 11c21, 80-365 Gdańsk, POLAND NIP (Tax ID): 584-222-8321, REGON: 363050034, registered and listed in the Central Register and Information on Economic Activity, holding the status of an entrepreneur.

### **The Data Controller may be contacted at:**

1. Correspondence address:  
Agnieszka Klimczak, conducting business activity under the name "Iddeni by Agnieszka Klimczak," ul. Jelitkowski Dwór 11c21, 80-365 Gdańsk, POLAND
2. Email: [a.klimczak@iddeni.com](mailto:a.klimczak@iddeni.com)
3. Phone: +48 505 239 865

### **Purposes, legal basis, and retention periods for processing personal data:**

- **Conclusion and performance of an electronic services contract** – Art. 6(1)(b) GDPR – data will be stored for the duration of the contract, and thereafter for the period required by law.
- **Conclusion and performance of a sales contract** – Art. 6(1)(b) GDPR – data will be stored for the duration of the sales contract, and thereafter for the period required by law.
- **Compliance with tax and accounting obligations** – Art. 6(1)(c) GDPR – data will be stored for the period necessary to fulfill the Controller's tax obligations.
- **Defense, establishment, or exercise of legal claims** – Art. 6(1)(f) GDPR – data will be processed for the duration of pursuing claims, no longer than until the expiry of the limitation period.
- **Handling of pre-contract inquiries from Buyers** – Art. 6(1)(b) GDPR – data will be processed for the period necessary to establish contact and resolve the matter.
- **Marketing purposes** – Art. 6(1)(a) or (f) GDPR – data will be processed for the duration of the marketing campaign or until consent is withdrawn or an objection is raised.
- **Cookies and similar technologies** – Art. 6(1)(a) GDPR – data will be processed until such files are deleted through browser settings (bearing in mind that deleting cookies does not always equal deletion of the data collected via those cookies), or until consent is withdrawn.

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### **Technical data processing**

In order to perform the service agreement, the Controller also processes information about the Buyer's device to ensure proper functioning of the services: IP address, cookie data, session data, browser information, device information, and activity data on the Website, including subpages.

Such data is processed under Art. 6(1)(b) GDPR to perform services in line with the Store's Terms and Conditions, and under Art. 6(1)(a) GDPR when consent is given for specific cookies or similar technologies through browser settings, in line with telecommunications law. Data is processed until the Client ceases to use the Store.

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## **Data recipients**

Recipients or categories of recipients of the Buyer's personal data include:

- tax authorities,
- accounting office,
- law firm,
- hosting provider,
- invoicing system provider,
- mailing system provider,
- Google Analytics,
- social media platforms (e.g., Facebook),
- banks,
- payment service providers.

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## **Rights of data subjects**

Each data subject has the right to:

- access their personal data,
- rectify their personal data,
- erase their personal data (“right to be forgotten”),
- restrict the processing of their personal data,
- data portability,
- object to processing,
- lodge a complaint with a supervisory authority.

Where processing is based on:

a) Art. 6(1)(a) GDPR (consent), or

b) Art. 9(2)(a) GDPR (explicit consent for special categories of data),

the data subject has the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

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## **Right to object**

The data subject may object at any time to the processing of their personal data in the following cases:

- Processing based on Art. 6(1)(e) GDPR (task carried out in the public interest or in the exercise of official authority) or Art. 6(1)(f) GDPR (legitimate interests pursued by the Controller or a third party), including profiling, on grounds relating to their particular situation. The Controller may no longer process the data unless it demonstrates compelling legitimate grounds overriding the interests, rights, and freedoms of the data subject, or for the establishment, exercise, or defense of legal claims.
- Processing for direct marketing purposes, including profiling.

- Processing for scientific or historical research or statistical purposes under Art. 89(1) GDPR, on grounds relating to their particular situation, unless processing is necessary for the performance of a task carried out for reasons of public interest.

To exercise these rights, the data subject should contact the Data Controller using the provided contact details and specify which right and to what extent they wish to exercise.

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### **Supervisory authority**

The data subject has the right to lodge a complaint with the supervisory authority, which in Poland is the President of the Personal Data Protection Office (PUODO), ul. Stawki 2, 00-193 Warsaw.

Contact options:

1. By mail: ul. Stawki 2, 00-193 Warsaw
  2. Via electronic inbox available at: <https://uodo.gov.pl/pl/p/kontakt>
  3. By phone: +48 (22) 531 03 00
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### **Requirement to provide personal data**

Providing personal data by the Buyer is a condition for concluding the contract. Without providing the data, conclusion and performance of the contract is impossible.

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### **Security of processing**

The Data Controller applies appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including, where applicable:

- a) pseudonymization and encryption of personal data,
  - b) the ability to ensure ongoing confidentiality, integrity, availability, and resilience of processing systems and services,
  - c) the ability to restore availability and access to personal data in a timely manner in the event of a physical or technical incident,
  - d) regular testing, assessing, and evaluating the effectiveness of technical and organizational measures to ensure processing security.
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### **Cookies**

The Controller's system uses cookies - small text files sent by a web server and stored on the Buyer's device (computer, tablet, smartphone, etc.) used to browse websites.

The Controller uses the following third-party cookies within the Website:

### **Homepage**

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### **Technical requirements for using services**

To use the services, the Buyer must have:

- a computer or other device with Internet access,
- a standard operating system,
- a standard web browser,

- an active email address,
  - cookies enabled in the browser.
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### **Forms used within the Store and *Business the arab way* Updates**

***This Privacy Policy may be supplemented or updated as needed to ensure Buyers receive current and accurate information regarding their personal data and related information.***

- **Contact form** – allows electronic communication with the Controller. Requires: name, surname, phone number, and email. Data will be processed in accordance with this Privacy Policy and stored until the expiry of claims.
- **Store registration form** – allows the Buyer to create an account and make purchases. Requires: name, surname, phone number, and email. Data stored until the expiry of claims and for the period necessary for tax obligations.
- **Order form** – enables placing an order and concluding a sales contract. Requires: name, surname/company name (optional), delivery address, email, phone number, NIP (optional). Data stored until the expiry of claims and for the period necessary for tax obligations.
- **Club registration form** – allows the Buyer to create an account in the Club. Requires: email. Data stored until the expiry of claims or for the period necessary for tax obligations.
- **Streaming platform registration form** – allows the Buyer to create an account and access functionalities, including an Audiobook. Requires: email. Data stored until the expiry of claims and for the period necessary for tax obligations.
- **Training platform registration form** – allows the Buyer to create an account and access functionalities, including Courses. Requires: email. Data stored until the expiry of claims and for the period necessary for tax obligations.
- **Contract withdrawal form** – allows the Buyer to withdraw from the contract as described in the Terms and Conditions. Requires: name and address. Use of the form is optional. Data processed for withdrawal handling and stored until the expiry of claims.
- **Newsletter subscription form** – allows the Buyer to subscribe to the newsletter. Requires: name and email. By subscribing, the User consents to:
  - receiving marketing and commercial information by email,
  - the Controller’s use of telecommunications devices for direct marketing,
  - receiving commercial information.

These consents are voluntary but necessary for sending the newsletter. They may be withdrawn at any time, which will result in the cessation of newsletter delivery in line with this Privacy Policy.

### **Updates**

This Privacy Policy may be supplemented or updated as needed to ensure Buyers receive current and accurate information regarding their personal data and related information.