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### **Data controller is:**

Alfex sp. z o.o.

ul. Skłodowskiej 22-24

55-120 Oborniki Śląskie

E-Mail: [sklep@internetowysupermarket.pl](mailto:sklep@internetowysupermarket.pl)

Thank you for visiting our online shop. Protection of your privacy is very important to us. Below you will find extensive information about how we handle your data.

## **1. Access data and hosting**

You may visit our website without revealing any personal information. With every visit on the website, the web server stores automatically only a so-called server log file which contains e.g. the name of the requested file, your IP address, the date and time of the request, the volume of data transferred and the requesting provider (access data), and documents the request. These access data are analysed exclusively for the purpose of ensuring the smooth operation of the website and improving our offer. This serves according to Art. 6 (1) (f) GDPR the protection of our legitimate interests in the proper presentation of our offer that are overriding in the process of balancing of interests. All access data are deleted no later than one month after the end of your visit on our website.

## **Hosting**

The services for hosting and displaying the website are partly provided by our service providers on the basis of processing on our behalf. Unless otherwise stated in this privacy policy, all access data and all data collected in forms provided for this purpose on this website are processed on their servers. If you have any questions about our service providers and the basis of our cooperation with them, please use the contact option described in this privacy policy.

## **2. Data processing for the purposes of processing the contract, establishing contact**

### **2.1 Data processing for the purposes of performing the contract**

For the purpose of performing the contract (including enquiries regarding the processing of any existing warranty and performance fault claims as well as any statutory updating obligations) in accordance with Art. 6 (1) (b) GDPR, we collect personal data if you provide it to us voluntarily as part of your order. Mandatory fields are marked as such, as in these cases we necessarily need the data to process the contract and we cannot send the order without their specification. Which data is collected can be seen from the respective input forms.

Further information on the processing of your data, in particular on the forwarding of the data to our service providers for the purpose of order, payment and shipping, can be found in the following sections of this privacy policy. After complete processing of the contract, your data will be restricted for further processing and deleted after expiry of the retention periods under tax and commercial law in accordance with Art. 6 (1) (c) GDPR, unless you have expressly consented to further use of your data in accordance with Art. 6 (1) (a) GDPR or we reserve the right to use data beyond this, which is permitted by law and about which we inform you in this privacy policy.

## **Merchandise management system**

We use merchandise management systems of external service providers for order and contract processing. We engage our service providers on the basis of processing on our behalf. If you have any questions about our service providers and the basis of our cooperation with them, please use the contact option described in this privacy policy.

## **2.2 Customer account**

Insofar as you have given your consent to this in accordance with Art. 6 (1) (a) GDPR by deciding to open a customer account, we will use and store your data for the purpose of opening the customer account as well as for further future orders on our website. Deletion of your customer account is possible at any time and can be done either by sending a message to the contact option described in this privacy policy or via a function provided for this purpose in the customer account. After deletion of your customer account, your data will be deleted unless you have expressly consented to further use of your data in accordance with Art. 6 (1) (a) GDPR or we reserve the right to use data beyond this, which is permitted by law and about which we inform you in this privacy policy.

## **2.3 Establishing contact**

As part of our customer communication, we collect personal data in order to process your enquiries in accordance with Art. 6 (1) (b) GDPR if you voluntarily provide us with this data when contacting us (e.g. via contact form or e-mail). Mandatory fields are marked as such, as in these cases we necessarily need the data to process your enquiry. Which data is collected can be seen from the respective input forms. After your enquiry has been fully processed, your data will be deleted unless you have expressly consented to further use of your data in accordance with Art. 6 (1) (a) GDPR or we reserve the right to use data beyond this, which is permitted by law and about which we inform you in this privacy policy.

## **3. Data processing for the purposes of shipment**

We forward your data to the shipping company within the scope required for the delivery of the ordered goods according to Art. 6 (1) (b) GDPR. If you have any questions about our service providers and the basis of our cooperation with them, please use the contact option described in this privacy policy.

## **4. Data processing for the purposes of payment**

As part of the payment process in our online shop, we work together with these partners: technical service provider, credit institution, payment service provider.

#### **4.1 Data processing for the purposes of transaction processing**

Depending on the selected payment method, we transfer the data necessary for processing the payment transaction to our technical service providers, to the commissioned credit institutions, or to the selected payment service provider, insofar as this is required for processing the payment. This is done for the performance of the contract pursuant to Art. 6 (1) (b) GDPR. In some cases, the payment service providers themselves collect the data required for processing the payment, e.g. on their own website or via a technical integration in the ordering process. In this respect, the privacy policy of the respective payment service provider applies

Depending on the selected payment method, data transfers may occur to third countries outside the EU/EEA for which the European Commission has determined an adequate level of data protection by decision. Insofar as data transfers take place to third countries outside the EU/EEA for which the European Commission has not issued a decision on an adequate level of data protection, the cooperation is based on the European Commission's standard contractual clauses.

If you have any questions regarding our partners for payment processing or the basis of our cooperation with them, please contact the point of contact specified in this privacy policy.

#### **4.2 Data processing for the purposes of fraud prevention and optimisation of our payment processes**

Where applicable, we transfer additional data to the aforementioned service providers. They use this data together with the information necessary for processing the payment for the purposes of fraud prevention and optimizing our payment processes (e.g., invoicing, handling disputed payments, supporting accounting). This processing is carried out pursuant to Art. 6 (1) (f) GDPR on the basis of our overriding legitimate interests, in protecting ourselves against fraud and ensuring efficient payment management.

### **5. Marketing via E-mail**

If you subscribe to our newsletter, we will regularly send you our email newsletter based on your consent according to Art. 6 (1) (a) GDPR, using the data required or disclosed by you separately for this purpose.

You can unsubscribe from the newsletter at any time. This can either be done by sending a message to the contact option described in this privacy policy or via a link provided for this purpose in the newsletter. After unsubscribing, we will delete your e-mail address from the list of recipients, unless you have expressly consented to the further use of your data according to Art. 6 (1) (a) GDPR or we have reserved the right to use your data for other purposes that are permitted by law and about which we inform you in this privacy policy.

## **Sending review requests by e-mail**

If you have given us your explicit consent to do so during or after placing your order in accordance with Art. 6 (1) (a) GDPR, we will use your e-mail address to request a review of your order via the review system we use. This consent can be withdrawn at any time by sending a message to the contact option described in this privacy policy or via a link provided for this purpose in the review request. After you have withdrawn your consent, we will delete your e-mail address from the recipient list unless you have expressly consented to further use of your data in accordance with Art. 6 (1) (a) GDPR or we have reserved the right to use data beyond this, which is permitted by law and about which we inform you in this declaration.

The review requests may also be sent by our service provider Trusted Shops SE Subbelrather Str. 15C, 50823 Cologne ("Trusted Shops").

In the process, we receive information on the respective status through Trusted Shops (e.g. whether the review request was sent out or received). This is done in accordance with Art. 6 (1) (f) GDPR to fulfill our legitimate interest in receiving information about the review requests in order to make optimizations based on them, if necessary, as well as to fulfill the legitimate interest of Trusted Shops in being able to offer this service.

We and Trusted Shops act as joint controllers in regards to sending review requests and the collection and display of review or status information.

Within the framework of the joint controllership between us and Trusted Shops, please contact Trusted Shops if you have any data protection questions or wish to assert your rights. You can find their contact details [here](#). Further information on data protection can be found in the following link [here](#). Regardless of this, you can also always contact us using the contact option described in this privacy policy. Your inquiry will then, if necessary, be passed on to the party responsible for responding to it.

## **6. Cookies and further technologies**

## **General information**

In order to make visiting our website attractive and to enable the use of certain functions, to display suitable products or for market research, we use technologies on various pages, including so-called cookies. Cookies are small text files that are automatically stored on your end device. Some of the cookies we use are deleted after the end of the browser session, i.e. after closing your browser (so-called session cookies). Other cookies remain on your end device and enable us to recognise your browser during your next visit (persistent cookies). You can find the storage period in the overview of your web browser's cookie settings.

### **Protection of privacy for terminal devices**

When you use our online services, we use technologies that are absolutely necessary in order to provide the telemedia service you have expressly requested. The storage of information in your terminal device or access to information that is already stored in your terminal device does not require consent in this respect.

For functions that are not absolutely necessary, the storage of information in your terminal device or access to information that is already stored in your terminal device requires your consent. Please note that if you do not give your consent, parts of the website may not be available for unrestricted use. Any consent you may have given will remain valid until you adjust or reset the respective settings in your terminal device.

### **Any downstream data processing through cookies and other technologies**

We use such technologies that are strictly necessary for the use of certain functions of our website (e.g. shopping cart function). These technologies are used to collect and process IP addresses, time of visit, device and browser information as well as information on your use of our website (e.g. information on your preferences). This serves to safeguard our legitimate interests in an optimised presentation of our offer that are overriding in the process of balancing of interests according to Art. 6 (1) (f) GDPR.

In addition, we use technologies to fulfil the legal obligations, which we are subject to (e.g. to be able to prove consent to the processing of your personal data) as well as for web analysis and online marketing. Further information on this, including the respective legal basis for data processing, can be found in the following sections of this privacy policy.

### **What types of cookies are being used?**

#### **Cookie settings**

You can find the cookies settings for your browser by clicking on the following links:

[Microsoft Edge™](#) / [Safari™](#) / [Chrome™](#) / [Firefox™](#) / [Opera™](#)

If you have consented to the use of the technologies in accordance with Art. 6 (1) (a) GDPR, you can withdraw your consent at any time by sending a message to the contact option described in the privacy policy.

## **7. Use of cookies and other technologies**

We use the following cookies and other third-party technologies on our website. Unless otherwise specified for the individual technologies, this is done on the basis of your consent in accordance with Art. 6 (1) (a) GDPR. The data collected in this context will be deleted after the relevant purpose has been fulfilled and we have ended the use of the respective technology. You can withdraw your consent at any time with effect for the future. Further information on your withdrawal options can be found in the section "cookies and further technologies". Further information, including the basis of our cooperation with the service providers can be found within the respective technologies. If you have any questions about our service providers and the basis of our cooperation with them, please use the contact option described in this privacy policy.

### **Use of Google services**

We use the following technologies of Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). The information automatically collected by Google technologies about your use of our website is usually transferred to a server of Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA and stored there. Unless otherwise specified for the specific technologies, data processing is based on an agreement concluded for the respective technology between jointly responsible parties in accordance with Art. 26 GDPR. Further information about data processing by Google can be found in [Google's privacy policy](#).

Our service providers are located and/or use servers in countries outside the EU and the EEA for which the European Commission has established by decision an adequate level of data protection.

Our service providers are located and/or use servers in countries outside the EU and the EEA. For these countries there is no adequacy decision by the European Commission. Our cooperation is based on standard data protection clauses adopted by the European Commission.

### **Google Analytics**

For the purpose of website analysis, Google Analytics automatically collects and stores data (IP address, time of visit, device and browser information as well as information on your use of our website), from which usage profiles are created using pseudonyms. Cookies may be used for this purpose. If you visit our website from the EU, your IP address will be stored on a server located in the EU to derive location data and then deleted immediately before the traffic is forwarded to further Google servers for processing. The data processing is carried out on the basis of an order processing agreement by Google.

In order to optimize the marketing of our website, we have activated the **data sharing settings for "Google products and services"**. This allows Google to access the data collected and processed by Google Analytics and then use it to improve Google services. The data sharing to Google within the scope of these data sharing settings is based on an additional agreement between the data controllers. We have no influence on the subsequent data processing by Google.

For web analytics purposes, the extension function of Google Analytics **Google Signals** enables so-called "cross-device tracking". If your internet-enabled devices are linked to your Google Account and you have activated the "personalised advertising" setting in your Google Account, Google can generate reports on your usage behaviour (in particular cross-device user numbers), even if you change your device. We do not process personal data in this respect; we only receive statistics based on Google Signals.

For web analytics and advertising purposes, the extension function of Google Analytics enables the so-called **DoubleClick cookie** to recognize your browser when visiting other websites. Google will use this information to compile reports about your website activities and to provide other services related to the use of the website.

If you **do not give us your consent** to the use of Google Analytics in accordance with Art. 6 (1) (a) GDPR, no cookies will be stored on your device or read out. The data processing described in the previous paragraphs does not take place. In order to close gaps in web analysis through behaviour and conversion modelling, pings with data (user agent, information on your consent behaviour, screen resolution, IP address) are sent to Google.

## **Google AdSense**

Our Website markets advertising space to third party service providers and advertising networks via Google AdSense. Those advertisements will be shown to you in different places on this website. The so-called DoubleClick cookie enables the display of interest-based advertising through the collection and processing of data (IP address,

time of visit, device and browser information as well as information on your use of our website) and the automatic assignment of a pseudonymous UserID, which is used to determine interests based on visits to this and other websites.

## **Google Ads**

For advertising purposes in the Google search results as well as on the websites of third parties, the so-called Google **Remarketing** Cookie is used when you visit our website, which automatically enables interest-based advertising through the collection and processing of data (IP address, time of visit, device and browser information as well as information on your use of our website), by means of a pseudonymous cookie ID and on the basis of the pages you visit. Any further data processing only takes place if you have activated the setting "personalised advertising" in your Google account. In this case, if you are logged into Google while visiting our website, Google will use your data together with Google Analytics data to create and define target group lists for cross-device remarketing.

For website analysis and event tracking, we use Google Ads **Conversion Tracking** to measure your subsequent usage behavior when you arrive on our website via a Google Ads ad. For this purpose, cookies may be used and data (IP address, time of visit, device and browser information as well as information on your use of our website based on events specified by us, such as a visit to a website or newsletter registration) may be collected, from which usage profiles are created using pseudonyms.

If you **do not give us your consent** to the use of Google Ads in accordance with Art. 6 (1) (a) GDPR, no cookies will be stored on your device or read out. The data processing described in the previous paragraphs does not take place. In order to close gaps in web analysis through behaviour and conversion modelling, pings with data (user agent, information on your consent behaviour, screen resolution, IP address, page URL, information on ad clicks in URL parameters) are sent to Google. Your IP address is used to derive the IP country.

## **Google Maps**

For the visual representation of geographical information, Google Maps collects data on your use of the Maps functions, in particular the IP address and location data, and transmits this data to Google and then processes it by Google. We have no influence on this subsequent data processing.

## **Google reCAPTCHA**

For the purpose of protection against misuse of our web forms as well as against spam by automated software (so-called bots), Google reCAPTCHA collects data (IP address, time of visit, browser information as well as information on your use of our website) and performs an analysis of your use of our website by means of a so-called JavaScript and cookies. In addition, other cookies stored in your browser by Google services are evaluated. Personal data is not read out or stored from the input fields of the respective form.

## **Google Tag Manager**

By means of the Google Tag Manager, we can manage various codes and services on our website. When implementing the individual tags, Google may also process personal data (e.g. IP address, online identifiers (including cookies)). The data processing is carried out on the basis of an order processing agreement by Google.

By using the Google Tag Manager, a simplified integration of various services/technologies can be achieved.

If you do not wish to use individual tracking services and have therefore deactivated them, the deactivation remains in place for all affected tracking tags that are integrated by the Google Tag Manager.

## **8. Integration of the Trusted Shops Trustbadge / other widgets**

Trusted Shops widgets are integrated in this website to display Trusted Shops services (e.g. Trustmark, collected reviews) and to offer buyers Trusted Shops products after they have placed an order.

This serves to protect our legitimate interests in optimized marketing by enabling secure shopping in accordance with Art. 6 (1) (f) GDPR, which prevail in the context of a balancing of interests. The Trustbadge and the services advertised with it are an offer of Trusted Shops SE, Subbelrather Str. 15C, 50823 Cologne ("Trusted Shops"). We and Trusted Shops are joint controllers in data protection terms pursuant to Art. 26 GDPR. In the following section, we inform you about the essential contents of the joint controllership agreement according to Art. 26 (2) GDPR.

Within the framework of the joint responsibility existing between us and Trusted Shops SE, please preferably contact Trusted Shops using the contact options provided in [the privacy policy](#), if you have any data protection questions and wish to assert your rights. Irrespective of this, however, you can always contact the person responsible of your choice. Your enquiry will then, if necessary, be passed on to the other person

responsible for a response.

## **8.1 Data processing when integrating the Trustbadge/other widgets**

The Trustbadge is provided by a US-American CDN provider (content delivery network). An adequate level of data protection is ensured by an adequacy decision of the EU Commission, which can be accessed [here](#) for the USA. Service providers from the USA are generally certified under the EU-U.S. Data Privacy Framework (DPF). Further information is available [here](#). Where service providers are not certified under the DPF, standard contractual clauses have been concluded as a suitable guarantee.

When the Trustbadge is called up, the web server automatically saves a so-called server log file, which also contains your IP address, the date and time of the call-up, the amount of data transferred and the requesting provider (access data) and the call-up. Immediately after the data collection the IP address is anonymised so that the stored data cannot be assigned to you personally. The anonymised data are used in particular for statistical purposes and for error analysis.

## **8.2 Data processing after order completion**

After the order has been completed, order information (order total, order number, product purchased, if applicable) and your email address, which has been hashed using a cryptological one-way function, are transmitted to Trusted Shops. The legal basis for this processing is Art. 6 (1) (f) GDPR.

This serves to verify whether you are already registered for services with Trusted Shops and is therefore necessary for the fulfilment of our and Trusted Shops' overriding legitimate interests in the provision of the buyer protection linked to the specific order in each case and the transactional evaluation services in accordance with Art. 6 (1) (f) GDPR. If this is the case, further processing will be carried out in accordance with the contractual agreement between you and Trusted Shops. If you have not yet registered for the services, you will subsequently be given the opportunity to do so for the first time. Further processing after registration also depends on the contractual agreement with Trusted Shops. If you do not register, all transmitted data will be automatically deleted by Trusted Shops and a personal reference is no longer possible.

Trusted Shops uses service providers in the areas of hosting, monitoring and logging. The legal basis is Art. 6 (1) (f) GDPR for the purpose of ensuring trouble-free operation. Processing may take place in third countries (USA, UK and Israel). An adequate level of data protection is ensured in each case by an adequacy decision of the EU Commission, which can be accessed [here](#) for the USA, [here](#) for the United Kingdom

and [here](#) for Israel. Service providers from the USA are generally certified under the EU-U.S. Data Privacy Framework (DPF). Further information is available [here](#). Where service providers are not certified under the DPF, standard contractual clauses have been concluded as a suitable guarantee.

## 9. Contact options and your rights

### 9.1 Your rights

Being the data subject, you have the following rights according to:

- art. 15 GDPR, the right to obtain information about your personal data which we process, within the scope described therein;
- art. 16 GDPR, the right to immediately demand rectification of incorrect or completion of your personal data stored by us;
- art. 17 GDPR, the right to request erasure of your personal data stored with us, unless further processing is required
  - to exercise the right of freedom of expression and information;
  - for compliance with a legal obligation;
  - for reasons of public interest or
  - for establishing, exercising or defending legal claims;
- art. 18 GDPR, the right to request restriction of processing of your personal data, insofar as
  - the accuracy of the data is contested by you;
  - the processing is unlawful, but you refuse their erasure;
  - we no longer need the data, but you need it to establish, exercise or defend legal claims, or
  - you have lodged an objection to the processing in accordance with art. 21 GDPR;
- art. 20 GDPR, the right to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format or to request its transmission to another controller;
- art. 77 GDPR, the right to complain to a supervisory authority . As a rule, you can contact the supervisory authority at your habitual place of residence or workplace or at our company headquarters.

### **Right to object**

If we process personal data as described above to protect our legitimate interests that are overriding in the process of balancing of interests, you may object to such data processing with future effect. If your data are processed for direct marketing purposes, you may exercise this right at any time as described above. If your data are processed for other purposes, you have the right to object only on grounds relating to your particular situation.

After you have exercised your right to object, we will no longer process your personal data for such purposes unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

This does not apply to the processing of personal data for direct marketing purposes. In such a case we will no longer process your personal data for such purposes.

## **9.2 Contact options**

If you have any questions about how we collect, process or use your personal data, want to enquire about, correct, restrict or delete your data, or withdraw any consents you have given, or opt-out of any particular data use, please contact us directly using the contact data provided in our supplier identification.