

## PRIVACY POLICY

This privacy policy contains information on the processing of personal data of users of the hubix.pl website, including users of the online store operated by Hubix sp. z o. o. (hereinafter: "**User**").

**This document regulates the principles of personal data processing and the use of cookies and other tracking technologies in connection with the operation of the website [www.hubix.pl](http://www.hubix.pl).**

In case of any doubts related to the privacy policy, you can contact Hubix at any time by sending a message to [rodo@hubix.pl](mailto:rodo@hubix.pl).

**The administrator** of the personal data of the users is Hubix sp. z o. o. with its registered office in Huta Źabiowolska, at the address: ul. Główna 43, Huta Źabiowolska, 96-231 Źabia Wola, entered into the register of entrepreneurs maintained by the District Court for Źódź -ŹródleŹcie in Źódź, XX Commercial Division of the National Court Register under the number: 0000500184, REGON: 147123591, NIP: 5291803171 (hereinafter: "**Hubix**" or "**Company**" or "**Administrator**").

As part of the implementation of personal data protection, the Company has not appointed a personal data protection officer. In matters related to personal data protection and broadly understood privacy, you can contact us at the e-mail address [rodo@hubix.pl](mailto:rodo@hubix.pl).

**The scope of personal data processed** is indicated separately in relation to the individual purposes of personal data processing in Annex 1 to the privacy policy.

Hubix uses tools that collect information about users related to the use of the website [www.hubix.pl](http://www.hubix.pl), in particular such as:

- 1) user's name and surname,
- 2) address and place of residence,
- 3) Tax Identification Number and company name,
- 4) contact telephone number, contact e-mail address,
- 5) information about the user's device, operating system and web browser,
- 6) user identifier (user-ID),
- 7) IP address subject to shortening and anonymization,
- 8) date of visit to the website,
- 9) viewed subpages,
- 10) time spent on the website,
- 11) transitions between individual subpages,
- 12) clicking the mouse or touching the screen,
- 13) clicking on individual links,
- 14) the source from which the user reaches the site,
- 15) the age range in which the user is located,



- 16) user's gender,
- 17) approximate user location, limited to the town,
- 18) user interests determined based on online activity,

This information is referred to in this privacy policy as "Anonymous Information". In Hubix's opinion, Anonymous Information itself does not constitute personal data, as it does not allow Hubix to identify the user and is not combined with the user's typical personal data that is collected about him.

However, and taking into account the strict case law of the Court of Justice of the European Union, as a precaution, in case Anonymous Information is considered to be personal data, this privacy policy also includes detailed explanations regarding the processing of this information.

Hubix is not able to provide users with access to Anonymous Information about them, because Hubix is not able to assign any of the Anonymous Information to any specific user. From the level of tools collecting Anonymous Information, Hubix only has access to a set of statistics and information not assigned to specific individuals. Moreover, Hubix does not have access to information collected by some tools at all, as Hubix is only interested in the correct operation of the function provided by a given tool, and not the information collected by it.

For example, a specific plugin may collect some information, but it is not shared in any way, and the Administrator is not interested in this information, because it is only important for him that a given functionality of the plugin (e.g. sending a newsletter form) works correctly.

Processing Anonymous Information allows for providing the user with the possibility of using the functionalities available on the website.

In addition, Anonymous Information is used for analytical, statistical and marketing purposes, such as setting and targeting advertisements.

Because Anonymous Information is collected by external tools used by Hubix, Anonymous Information is also processed by the tool providers under their terms and conditions and privacy policies.

Anonymous Information is also used by the providers of individual tools to provide and improve services, manage them, develop new services, measure the effectiveness of advertising, protect against fraud and abuse, and personalize content and advertising displayed on individual services, websites and applications. The tools used by Hubix that involve the collection of Anonymous Information are listed in Annex 2 to this privacy policy.

The user's personal data are processed:

- a) without the user's consent on the basis of a contract, fulfillment of a legal obligation or a legally binding obligation legitimate interest (e.g. protection of legal claims, internal recording and control of the proper provision of our services, possibly also sending requests for reviews of a purchase made) or
- b) with the user's consent.



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The processing of data without the user's consent depends on the specific purpose of the data processing, the position of the data subject in relation to Hubix, namely whether the data subject only visits the Hubix website, makes a purchase or registers. The data is also processed in the event that the data subject is the addressee of ordered goods, contacts Hubix or visits the collection and sale point.

### **Sources of User Personal Data.**

In most cases, you will voluntarily provide personal data to Hubix when:

- 1) registers a user account,
- 2) completes the user profile,
- 3) places an order,
- 4) submits a complaint or withdraws from the contract,
- 5) contacts Hubix via email,
- 6) follows Hubix profiles on social media or interacts with them with content published by Hubix on social media,
- 7) sends a request related to the processing of personal data.

In Annex 1 to this privacy policy, the source of data acquisition has been assigned to each of the processing purposes.

In addition, some information about the user may be automatically collected by the tools used by Hubix:

- 1) the site mechanism collects the user's IP address,
- 2) external tools listed in Annex 2 to this privacy policy collect Anonymous Information related to user actions undertaken within the website.

**Hubix takes care of the security of users' personal data.** The administrator has analyzed the risks associated with individual data processing processes user, and then implemented appropriate security and personal data protection measures. The Administrator constantly monitors the state of the technical infrastructure, trains staff, ensures that the procedures and guidelines applied are correct and introduces any necessary improvements.

**The purposes of processing the user's personal data** are listed in Annex 1 to this privacy policy.

The user's personal data is stored for as long as is justified within the given purpose of personal data processing, therefore the processing periods vary depending on the purpose - their specification can be found in the table constituting an annex to the privacy policy.

The termination of the processing of user data for one purpose does not necessarily have to be



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lead to the complete deletion or destruction of the user's personal data, because the data may be processed for another purpose, for the period indicated for it. For example, when the exchange of correspondence ends, the Administrator ceases the processing of personal data as part of the purpose of handling correspondence, but the data collected in connection with handling correspondence are further stored for the purpose of archiving them for the purpose of determining, pursuing or defending claims related to correspondence. The complete deletion or destruction of data occurs when the Administrator completes the implementation of all purposes, most often after the expiry of the limitation period for claims or the limitation period for administrative liability, or the period for which he has a legal obligation to store certain data.

**External service providers** involved in the processing of personal data

users are:

- 1) the hosting provider who stores the data on the server,
- 2) email provider,
- 3) cloud software providers where data is processed,
- 4) an accounting office that processes user data visible on invoices,
- 5) an entity providing technical support services that obtains access to data if the technical work carried out concerns areas in which personal data are located,
  
- 6) other entities that obtain access to data if the scope of their activities requires such access.

All entities listed above process users' personal data on the basis of personal data processing agreements concluded with Hubix and guarantee an adequate level of personal data protection.

If necessary, user data may be made available to an attorney or legal adviser bound by professional secrecy. The need may result from the need to use legal assistance requiring access to the user's personal data.

The user's personal data may also be transferred to tax offices to the extent necessary to fulfil tax, settlement and accounting obligations.  
(declarations, reports, statements and other accounting documents).

Users' personal data are made available to courier companies to the extent necessary to deliver the order. These companies become independent administrators of such personal data.

Access to Anonymous Information is provided by providers of tools or plug-ins that collect Anonymous Information. The providers of these tools are independent administrators of the data collected in them and may share this data on the terms specified by them in their own regulations and privacy policies, over which Hubix has no influence.

The Administrator does not transfer user data to third countries or international organizations.



The Administrator does not make decisions regarding users based solely on automated processing, including profiling, that would produce legal effects for the user or similarly significantly affect the user.

The Administrator uses tools that can take specific actions depending on the information collected through tracking mechanisms, but in the Administrator's opinion these actions do not have a significant impact on the user, as they do not differentiate the user's situation as a customer, do not affect the terms of the contract that the user may enter into with Hubix, etc.

Within the tools used by the Administrator, he/she has access only to Anonymous Information. This information is stored on the servers of the providers of the individual tools, and these servers can most often be located all over the world.

The GDPR grants the user the following potential rights related to the processing of their personal data:

- 1) the right to access your data and receive a copy thereof,
- 2) the right to rectify (correct) your data,
- 3) the right to delete data (if in the user's opinion there is no reason to delete it)  
The administrator processed the user's personal data, he may request their deletion),
- 4) the right to limit data processing (the user may request that the Administrator limit data processing solely to storing or performing actions agreed with the user if, in the user's opinion, the Administrator has incorrect data or processes it without justification),
- 5) the right to object to data processing (the user has the right to object to data processing based on a legitimate interest; the user should indicate a specific situation which, in the user's opinion, justifies the Administrator ceasing the processing covered by the objection; the Administrator will cease processing the user's data for these purposes unless it proves that the grounds for processing the data by it override the user's rights or that the user's data are necessary for the Administrator to establish, pursue or defend claims),
- 6) the right to transfer data (the user has the right to receive from the Controller in a structured, commonly used and machine-readable format the personal data that he provided to the Controller under the contract or his consent; the user may instruct the Controller to send this data directly to another entity),
- 7) the right to withdraw consent to the processing of personal data if the user  
he has previously given such consent,
- 8) the right to lodge a complaint with a supervisory authority (if the user finds that the Administrator is processing data unlawfully, he or she may lodge a complaint with the President of the Personal Data Protection Office or another competent supervisory authority).

The principles related to the implementation of the above-mentioned rights are described in detail in Articles 16 - 21 of the GDPR. The User may contact the Administrator with a request



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providing information on what data about the user the Administrator has and for what purposes it processes it, to the address **rodo@hubix.pl**.

**The Hubix website, like almost all other websites, uses cookies** and other similar technologies, such as tracking codes or pixels, conversion APIs, etc. Cookies are a standard tool for recording information about the use of websites. Using cookies or other similar technologies, certain information can be collected and then used for various purposes, from ensuring the correct operation of individual functions of the website, through analysis of user behavior on the website, to sending targeted advertising.

Hubix uses cookies and other similar technologies based on consent. user, except when cookies or other similar technologies are necessary for the proper provision of the electronic service to the user.

Cookies or other similar technologies that are not necessary for the proper provision of the service electronically remain blocked until the user expresses consent to the use of cookies or other similar technologies.

When a user first visits the site, a message is displayed asking for user consent.

Disabling or limiting the use of cookies or other similar technologies may prevent you from using some of the functions available on the Hubix website and cause difficulties in using the website, as well as many other websites that use cookies or other similar technologies. For example, if the user blocks cookies from social media plugins, buttons, widgets and social functions implemented on the website may be unavailable to them.

The user can manage the settings for cookies or other similar technologies within their web browser. The user can block all or selected cookies and block cookies from specific websites. The user can also delete previously saved cookies and other website and plug-in data at any time. Internet browsers also offer the option of using incognito mode. The user can use it if they do not want information about visited pages and downloaded files to be saved in the browsing and download history. Cookies created in incognito mode are deleted when all windows of this mode are closed. There are also browser plug-ins available that allow control over cookies, such as Ghostery (<https://www.ghostery.com>). The option to control cookies may also be provided by additional software, in particular antivirus packages, etc. In addition, there are tools available on the Internet that allow control over certain types of cookies, in particular for collective management of behavioral advertising settings (e.g. [www.youronlinechoices.com/](http://www.youronlinechoices.com/), [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices)).

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#### **Purposes of using own cookies.**

Own cookies are used to ensure the proper functioning of individual site mechanisms, such as the correct sending of forms.



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visible on the website. Own cookies also store information about the user's consent to cookies.

### **Third party cookies used.**

The Hubix website uses cookies or other similar third-party technologies related to the tools listed in Annex 2 to this privacy policy. Individual tools may use more than one cookie file. The Administrator refrained from indicating the scope of information collected in cookies for each tool used, taking into account that each tool collects information related to the characteristics and behavior of the user undertaken within the Hubix website. This is Information

Anonymous.

Knowing the requirements created by the Court of Justice of the European Union, the Administrator has nevertheless refrained from indicating the lifespan of cookies used by individual tools. In order to reliably determine the lifespan of each cookie file, it would be necessary to overwhelm the user with an excess of information that would not implement the principle of transparency and readability of information directed to the user.

In addition, the lifetime of cookies may be subject to such active changes on the part of tool providers that the Administrator is unable to exercise reliable control over it.

By refraining from specifying the lifespan of cookies, the Administrator reminds that the only option for real control over the time of storing information in cookies is to manage cookies directly by the user. From the level of their web browser, the user can delete cookies stored on their device.

The Administrator emphasizes that within cookies or other similar technologies there is no access to information that would allow us to identify the user. In this respect, we are dealing with Anonymous Information. Moreover, while in the case of statistical and marketing tools the Administrator can view various types of reports generated on the basis of Anonymous Information, in relation to other tools he does not even obtain any access to the information collected in cookies, being interested only in whether the functions of a given tool for which the tool was installed work properly within the website.

**The Administrator uses tools that involve collecting information about** the user's activity on the Hubix website. These tools are listed in Annex 2 to this privacy policy. The Administrator may use advertising tools, within which he may direct advertisements to specific target groups defined based on various criteria such as age, gender, interests, profession, work, actions previously undertaken within the Hubix website. These tools are listed in Annex 2 to this privacy policy.

### **How can a user manage their privacy?**

The answer to this question can be found in many places in this privacy policy when describing individual tools, behavioral advertising, cookie consent, etc. However, for the user's convenience, such information has been collected again in one place.

Below is a list of options for managing your privacy.

- 1) cookie settings in your web browser,
- 2) browser plug-ins supporting cookie management, e.g. Ghostery,
- 3) additional cookie management software,
- 4) incognito mode in the web browser,
- 5) behavioral advertising settings, e.g. youronlinechoices.com,
- 6) settings on the side of external tool providers (links to settings have been collected under Annex 2 to this privacy policy).

Using the service involves sending queries to the server where the page is stored. Each query sent to the server is saved in the server logs. **The logs include, among others**, the user's IP address, the date and time of the server, information about the web browser and the operating system used by the user. The logs are saved and stored on the server. The data saved in the server logs are not associated with specific people using the site and are not used by Hubix to identify the user. The server logs are only auxiliary material used to administer the site, and their content is not disclosed to anyone except those authorized to administer the server. The administrator may modify this privacy policy, in particular due to technological changes on the Hubix website and changes in legal regulations.

This privacy policy is effective on November 27, 2024.

#### Annex No. 1 - purposes of personal data processing

Purpose of processing	Legal basis for processing	Processing range of data	Storage period and data	Source of data acquisition
<b>Correspondence handling</b>	Art. 6 sec. 1 letter f of the GDPR – legitimate interest pursued by the controller consisting in responding to messages addressed to him.	Email address. Data included in correspondence.	Until the exchange of correspondence is completed.	Incoming message.
<b>Email newsletter support</b>	Article 6 section 1 letter f GDPR – legitimate interest	Email address. IP address. Approximate location. Profile	Until you unsubscribe from the newsletter.	A form where the user provides an email address and

Purpose of processing	Base legal processing	Processing range h data	Storage period and data	Source of data acquisition
	implemented by the administrator consisting in own marketing.	subscriber, including engagement statistics  m regarding the transmitted content.		at the same time, he agrees on receiving the newsletter. The mechanism of the mailing system that creates a subscriber profile.
<b>User account management</b>	Art. 6 sec. 1 letter b of the GDPR – conclusion and performance of a contract for the provision of services by electronic means in the form of a user account.	Data provided in the account registration form. IP address. Data provided voluntarily by the user in the account settings.	Until the user account is deleted.	User account registration form.  Service mechanism that saves the user's IP address.
<b>User business card support</b>	Art. 6 sec. 1 letter b of the GDPR – provision of services by electronic means related to the user's business card.	IP address. Data provided in the user profile.	Until the user's business card is deleted.	User profile completion form.  Service mechanism that saves the user's IP address.
<b>Order handling</b>	Art. 6 sec. 1 letter b of the GDPR – conclusion and performance of a contract concluded as a result of placing an order.	Data provided in the order form.  IP address. Order details.	Until completion of the contract.	Order form.  Service mechanism that saves the user's IP address.
<b>Recovering an abandoned cart</b>	Article 6 section 1 letter f of the GDPR – legitimate interest pursued by the controller in taking	Data provided in the order form.  Order details.	One month since cart abandonment.	Order form.

Purpose of processing	Base legal processing	Processing range h data	Storage period and data	Source of data acquisition
	activities aimed at concluding a contract and increasing sales.			
<b>Satisfaction survey</b>	Art. 6 sec. 1 letter f of the GDPR – legitimate interest pursued by the administrator consisting in obtaining feedback from customers on completed purchases.	Data provided in the order form. Order details.	Until the satisfaction survey is completed.	Order form.
<b>Complaint handling</b>	Art. 6 sec. 1 letter f of the GDPR – legitimate interest pursued by the controller consisting in handling the complaint procedure.	Data provided in the complaint. Complaint details.	Until the complaint procedure is completed.	Complaint.
<b>Withdrawal from the contract service</b>	Art. 6 sec. 1 letter f of the GDPR – legitimate interest pursued by the controller consisting in handling the procedure for withdrawal from the contract.	Data provided in the declaration of withdrawal from the contract.	Until the withdrawal procedure is completed.	Declaration of withdrawal from the contract.
<b>Bookkeeping</b>	Art. 6 sec. 1 lit.	Visible data Until then		Form

Purpose of processing	Base legal processing	Processing range of data	Storage period and data	Source of data acquisition
	<p>ow in connection with relevant provisions of tax law – fulfillment of tax obligations.</p>	<p>in the sales document.</p>	<p>expiry of the period during which legal regulations require the storage of accounting documentation.</p>	<p>orders.</p>
<b>Comment handling</b>	<p>Art. 6 sec. 1 letter b GDPR – provision of electronic services related to comments.</p>	<p>Data provided in the comment adding form.</p> <p>IP number.</p> <p>Comment content.</p>	<p>Until the comment is deleted.</p>	<p>Comment posting form.</p> <p>Comment system that records the user's IP address.</p>
<b>Feedback service</b>	<p>Art. 6 sec. 1 letter b of the GDPR – provision of electronic services related to opinions.</p>	<p>Data provided in the opinion addition form.</p> <p>IP address.</p> <p>Content of the opinion.</p>	<p>Until the review is deleted.</p>	<p>Opinion adding form.</p> <p>Opinion system that saves the user's IP address.</p>
<b>Handling matters related to DSA</b>	<p>Article 6 paragraph 1 letter c of the GDPR in conjunction with the relevant provisions of the DSA.</p>	<p>Data contained in notifications or appeals relating to storage content provided by us.</p>	<p>Until the completion of the application or appeal handling procedure.</p>	<p>Report or appeal.</p>
<b>Chatbot support</b>	<p>Art. 6 sec. 1 letter f GDPR – legitimate interest pursued by the controller consisting in providing the user with the possibility of interacting with the chatbot.</p>	<p>Data provided when using the chatbot. IP address.</p>	<p>Until you object to the processing of your data by the chatbot.</p>	<p>Chatbot.</p>
<b>Program support</b>	<p>Article 6 section 1 letter b of the GDPR –</p>	<p>Data provided in the form</p>	<p>Until the resignation</p>	<p>Registration form for</p>

Purpose of processing	Base legal processing	Processing range h data	Storage period and data	Source of data acquisition
partner	conclusion and performance of an agreement on participation in the affiliate program.	registration. IP address.	participation in the affiliate program.	program. Service mechanism that saves the user's IP address.
Push notifications	Art. 6 sec. 1 letter a GDPR – user consent to the display of notifications.	Anonymous Information.	Until you withdraw your consent to display notifications.	The mechanism responsible for notifications.
Social media support edu	Art. 6 sec. 1 let. f GDPR – legitimate interest pursued by the administrator consisting in the management of profiles in social media ych.	Data publicly visible on a user's profile on a social networking site ym. Details of user interactions within social media profiles ych.	Until the user deletes the data from the social networking site ego.	Social media profiles ych. Content posted by the user on social media ych.
Ad targeting	Art. 6 sec. 1 letter f GDPR – legitimate interest pursued by the controller consisting in own marketing.	Email address. Anonymous Information.	Until its usefulness ceases or an objection is filed.	User account registration form. Order form. Newsletter subscription form. Tracking scripts.
Analysis and statistics	Article 6 paragraph 1 letter f of the GDPR – the legitimate interest pursued by the controller consisting in creating, reviewing and	Anonymous Information.	Until its usefulness ceases or an objection is filed.	Tracking scripts.

Purpose of processing	Base legal processing	Processing range h data	Storage period and data	Source of data acquisition
	<p>analysing statistics related to user activity on the website in order to draw conclusions that will allow for subsequent optimisation of the website.</p>			
<b>Telephone Marketing</b>	<p>Art. 6 sec. 1 letter f GDPR – legitimate interest pursued by the administrator consisting in own marketing.</p>	Telephone number.	Until you withdraw your consent to telephone marketing.	A form in which the user provides a telephone number and at the same time consents to telephone marketing.
Handling requests related to personal data processing	Article 6, section 1, letter c of the GDPR – implementation of obligations arising from the GDPR.	Data provided in the submitted request. Content of the request.	Until the request processing procedure is completed.	Request related to the processing of personal data.
Archives	<p>Article 6 section 1 letter f of the GDPR – the legitimate interest pursued by the controller consisting in securing data for the purpose of establishing, defending or pursuing claims and for the purpose of demonstrating</p>	Data of varying scope, depending on what data has been provided to us and what scope of data is justified from an archival perspective.	<p>Until the limitation period for claims or the limitation period for our liability has expired</p> <p>related to the protection of personal data.</p>	All forms used to submit data.



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Purpose of processing	Base legal processing	Processing range h data	Storage period and data	Source of data acquisition
	compliance with the obligations arising from the GDPR.			

## Appendix No. 2 - list of external tools

Tool	Supplier	Purpose of use	Supplier explanations	Vendor Settings
Google Analytics	Google LLC	Analysis and statistics relating to the behaviour of website visitors.	<u>Look</u>	<u>Look</u>
YouTube	Google LLC	Embedding videos from YouTube.	<u>Look</u>	<u>Look</u>
Meta Pixel	Meta Platforms, Inc.	Advertising measurement and targeting.	<u>Look</u>	<u>Look</u>
Facebook Connect	Meta Platforms, Inc.	Providing social features.	<u>Look</u>	<u>Look</u>
TikTok	TikTok, Inc.	Analysis of website behavior, conversion measurement, and ad targeting within the TikTok advertising system.	<u>Look</u>	Lack