

## PRIVACY AND COOKIE POLICY

Hello

We have prepared this document for you, in which you will find the rules governing the processing of your personal data and the use of cookies in connection with your use of the website <https://abramovichatelier.com/pl/>

The website administrator is ABRAMOVICH GROUP SP. Z O.O.

If you have any questions regarding the privacy policy, you can contact us at any time by sending an email to [shop@abramovichjewelry.com](mailto:shop@abramovichjewelry.com)

### Summary – Key Information

1. By creating a user account, placing an order, filing a complaint, withdrawing from a contract, subscribing to the newsletter, or contacting us, you provide us with your personal data, and we guarantee that this data will remain confidential and will not be shared with third parties without your consent.
2. We entrust the processing of personal data only to verified and trusted partners who provide services related to the processing of personal data.
3. We use Google Analytics to collect information about your visits to our website, such as the pages you viewed, the time spent on the site, and your navigation between pages. To do this, we use cookies provided by Google LLC for the Google Analytics service. Through Google Analytics, we collect demographic data and data about your interests. In your cookie settings, you can decide whether or not to consent to the collection of such data about you.
4. We use the HotJar analytics tool, which tracks your behavior on our websites. Cookies from Hotjar Limited are used for this purpose. In your cookie settings, you can decide whether or not to consent to the use of such cookies in your case.
5. We use Google AdWords to run remarketing campaigns. Cookies from Google LLC related to the Google AdWords service are used for this purpose. In your cookie settings, you can decide whether or not to consent to the use of these cookies.
6. We use Google Tag Manager to manage advertising campaigns and track how you use our websites. Cookies from Google LLC related to the Google Tag Manager service are used for this purpose. In your cookie settings, you can decide whether or not to consent to the use of these cookies.
7. We use marketing tools, such as Facebook Pixel, to show you personalized ads on Facebook. This involves the use of Facebook cookies. In your cookie settings, you can choose whether or not to consent to our use of Facebook Pixel for your account.
8. We provide the ability to use social features, such as sharing content on social media and subscribing to a social media profile. Using these features may involve the use of cookies from social media platform operators such as Facebook, Instagram, and Twitter.
9. We use the Disqus commenting system, which uses cookies.
10. We use first-party cookies to ensure the proper functioning of the website, in particular to manage user accounts and the ordering process.
11. If the above information is not sufficient for you, you will find further details below.

### Personal Data

The controller of your personal data within the meaning of personal data protection regulations is ABRAMOVICH GROUP SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ, with its registered office in Warsaw at Plac Inwalidów 10/U7, 01-552, (KRS 0000682060, NIP 1182146849, REGON 367516601)

The purposes, legal bases, and duration of personal data processing are specified separately for each purpose of data processing (see the description of the specific purposes of personal data processing below).

Rights. The GDPR grants you the following potential rights regarding the processing of your personal data:

- the right to access personal data,

- the right to erasure of personal data,
- the right to rectify personal data,
- the right to restrict the processing of personal data,
- the right to object to the processing of personal data,
- the right to data portability,
- the right to lodge a complaint with a supervisory authority,
- the right to withdraw consent to the processing of personal data, if you have given such consent.

The rules governing the exercise of these rights are described in detail in Articles 16–21 of the GDPR. The rights listed above are not absolute and may not apply to all processing activities involving your personal data. We have made every effort to indicate the rights applicable to each specific personal data processing operation within the description of those operations.

We would like to emphasize that you always have one of the rights listed above—if you believe that we have violated data protection laws in the processing of your personal data, you have the right to file a complaint with the supervisory authority (the President of the Personal Data Protection Office).

You may also always contact us to request information about what data we hold about you and for what purposes we process it. Simply send an email to [\\_matiere47@gmail.com](mailto:_matiere47@gmail.com), or . You may also use the email address provided above for any questions regarding the processing of personal data.

**Security.** We guarantee the confidentiality of all personal data provided. We assure you that we have implemented all security and data protection measures required by data protection regulations. Personal data is collected with due diligence and adequately protected against access by unauthorized persons.

**Recipients of the data.** Your data may be processed by our subcontractors, i.e., entities whose services we use to process data, provide services to you, or fulfill orders in our online store.

All entities to whom we entrust the processing of personal data guarantee the implementation of appropriate measures to protect and secure personal data as required by law.

#### Purposes and activities of processing

**User account.** When creating a user account, you must provide the data necessary to create the account, such as your email address, first and last name, address, and phone number. Providing this data is voluntary but necessary to create an account. When editing your account data, you may provide additional information.

The data provided to us in connection with account creation is processed for the purpose of creating and maintaining the account based on the contract for the provision of electronic services concluded through account registration (Article 6(1)(b) of the GDPR).

The data contained in the account will be processed for the duration of the account's existence. When you decide to delete your account, we will also delete the data contained therein. Deleting your account does not result in the deletion of information about orders you placed using the account.

You can correct the information in your account, and you can also delete your account. You also have the right to data portability, as provided for in Article 20 of the GDPR.

**Orders.** When placing an order, you must provide the information necessary to fulfill the order, such as your first and last name, billing address, email address, and phone number. Providing this information is voluntary but necessary to place an order.

The data provided to us in connection with the order is processed for the purpose of fulfilling the order (Article 6(1)(b) of the GDPR), to issue an invoice (Article 6(1)(c) of the GDPR), to include the invoice in our accounting records (Article 6(1)(c) of the GDPR), and for archival and statistical purposes (Article 6(1)(f) of the GDPR).

Order data will be processed for the time necessary to fulfill the order, and then until the statute of limitations for claims arising from the concluded contract expires. Furthermore, after this period expires, we may

continue to process the data for statistical purposes. Please also note that we are required to retain invoices containing your personal data for a period of 5 years from the end of the tax year in which the tax liability arose.

In the case of order data, you cannot correct this data after the order has been fulfilled. You also cannot object to the processing of your data or request its deletion until the statute of limitations for claims arising from the contract has expired. Similarly, you cannot object to the processing of data or request the deletion of data contained in invoices. After the statute of limitations for claims arising from the concluded contract has expired, you may object to our processing of your data for statistical purposes, as well as request the deletion of your data from our database.

With regard to order data, you also have the right to data portability as referred to in Article 20 of the GDPR.

**Newsletter.** If you wish to subscribe to the newsletter, you must provide us with your email address via the newsletter subscription form. Providing this information is voluntary but necessary to subscribe to the newsletter.

The data provided to us when subscribing to the newsletter is used to send you the newsletter, and the legal basis for its processing is your consent (Article 6(1)(a) of the GDPR) expressed when subscribing to the newsletter.

The data will be processed for as long as the newsletter is active, unless you unsubscribe earlier, in which case your data will be deleted from the database.

You may correct your data stored in the newsletter database at any time, as well as request its deletion by unsubscribing from the newsletter. You also have the right to data portability, as provided for in Article 20 of the GDPR.

**Complaints and withdrawal from the contract.** If you file a complaint or withdraw from the contract, you provide us with the personal data contained in the complaint or the statement of withdrawal, which includes your first and last name, residential address, phone number, email address, and bank account number. Providing this data is voluntary but necessary to file a complaint or withdraw from the contract.

The data provided to us in connection with filing a complaint or withdrawing from a contract is used to process the complaint or withdrawal procedure (Article 6(1)(c) of the GDPR).

The data will be processed for the time necessary to complete the complaint or withdrawal procedure. Complaints and statements of withdrawal from the contract may also be archived for statistical purposes.

You cannot correct data contained in complaints or notices of withdrawal from a contract. You also cannot object to the processing of such data or request its deletion until the statute of limitations for claims arising from the contract has expired. However, after the statute of limitations for claims arising from the concluded contract has expired, you may object to our processing of your data for statistical purposes, as well as request the deletion of your data from our database.

**Email contact.** When you contact us via email, including by submitting an inquiry through the contact form, you naturally provide us with your email address as the sender's address. Additionally, you may include other personal data in the body of the message. Providing this data is voluntary but necessary to establish contact.

In this case, your data is processed for the purpose of contacting you, and the legal basis for processing is Article 6(1)(a) of the GDPR, i.e., your consent resulting from initiating contact with us. The legal basis for processing after the contact has ended is a legitimate interest in archiving correspondence for internal purposes (Article 6(1)(c) of the GDPR).

The content of your correspondence may be archived, and we are unable to specify exactly when it will be deleted. You have the right to request a history of the correspondence you have had with us (if it has been archived), as well as to request its deletion, unless its archiving is justified by our legitimate interests, such as defending against potential claims from you.

#### Cookies and Other Tracking Technologies

Our website and store, like almost all other websites, use cookies.

Cookies are small text files stored on your device (e.g., computer, tablet, smartphone) that can be read by our IT system (first-party cookies) or the IT systems of third parties (third-party cookies).

Some of the cookies we use are deleted at the end of your web browser session, i.e., when you close it (so-called session cookies). Other cookies are stored on your device and allow us to recognize your browser the next time you visit the site (persistent cookies).

You can find more details below.

Cookie consent. During your first visit to the website, you will see a notice regarding the use of cookies. Using a special tool, you can manage cookies directly on the website. Additionally, you can always change your cookie settings in your browser or delete cookies entirely.

Please note that disabling or restricting cookies may make it difficult to use our website, as well as many other websites that use cookies.

First-party cookies. We use first-party cookies to ensure the proper functioning of the website, particularly the ordering process and logging into the user's account.

Third-party cookies. Our website, like most modern websites, uses features provided by third parties, which involves the use of cookies from third parties. The use of these types of cookies is described below.

Google Analytics. We use the Google Analytics tool provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. We carry out these activities based on our legitimate interest in compiling and analyzing statistics to optimize our websites.

Google Analytics automatically collects information about your use of our website. The information collected in this way is usually transmitted to a Google server in the United States and stored there.

Due to the IP anonymization feature we have enabled, your IP address is truncated before being transmitted. Only in exceptional cases is the full IP address transmitted to a Google server in the United States and truncated there. The anonymized IP address transmitted by your browser as part of Google Analytics is generally not combined with other Google data.

Since Google LLC is headquartered in the U.S. and uses technical infrastructure located in the U.S., it has joined the EU-U.S. Privacy Shield program to ensure the adequate level of personal data protection required by European regulations. Under the agreement between the U.S. and the European Commission, the latter has determined that companies certified under the Privacy Shield provide an adequate level of data protection.

You can prevent Google from collecting data about your use of our website via cookies, as well as from processing this data, by installing the browser plugin available at the following address: <https://tools.google.com/dlpage/gaoptout>.

As part of Google Analytics, we also collect demographic and interest-based data. You can disable Google Analytics cookies directly from our website's cookie settings.

If you are interested in details regarding data processing within Google Analytics, we encourage you to review the explanations provided by Google: <https://support.google.com/analytics/answer/6004245>.

Hotjar. We use the Hotjar tool, provided by Hotjar Limited, Level 2, St Julian's Business Centre, 3, Elia Zammit Street, St Julian's STJ 1000, Malta. With Hotjar, we analyze your behavior on our websites, such as the time spent on individual pages, the buttons you click, the links you use, etc. We do this to optimize our websites for user experience. We carry out these activities based on our legitimate interest in optimizing our websites.

Hotjar uses cookies and other technologies to collect information about your behavior on the website and the devices you use to access it, such as your IP address (anonymized), screen size, browser information, location, and language. Hotjar stores this information in a pseudonymized profile. Neither Hotjar nor we will ever use this information to identify you. For more information, please see Hotjar's privacy policy: <https://www.hotjar.com/legal/policies/privacy>.

You can object to the creation of your anonymous profile and the storage of information about you by Hotjar by visiting this page: <https://www.hotjar.com/legal/compliance/opt-out>. Additionally, you can disable Hotjar cookies in the cookie settings on our website.

Google AdWords. We use Google AdWords marketing tools provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. We use Google AdWords to promote our website in search results and on third-party websites. We also use remarketing tools. We carry out these activities based on our legitimate interest in marketing our own products or services.

When you visit our website, a Google remarketing cookie is automatically stored on your device. This cookie uses a pseudonymous identifier (ID) and, based on the pages you visit, enables the display of interest-based ads.

Further data processing occurs only if you have consented to Google linking your browsing and app usage history to your account and using information from your Google account to personalize ads displayed on websites. If, in this case, you are logged into Google while visiting our website, Google will use your data together with Google Analytics data to create and define target audience lists for cross-device remarketing. To do this, Google temporarily combines your personal data with Google Analytics data to create target audiences.

Since Google LLC is headquartered in the U.S. and uses technical infrastructure located in the U.S., it has joined the EU-U.S. Privacy Shield program to ensure the adequate level of personal data protection required by European regulations. Under the agreement between the U.S. and the European Commission, the latter has determined that companies certified under the Privacy Shield provide an adequate level of data protection.

You can disable cookies used for remarketing in your Google account settings: <https://adssettings.google.com>. Additionally, you can disable the use of cookies for remarketing purposes in the cookie settings on our website.

If you are interested in details regarding data processing within Google AdWords, we encourage you to review Google's privacy policy: <https://policies.google.com/privacy>.

Google Tag Manager. We use the Google Tag Manager tool provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. With the help of Google Tag Manager, we manage our advertising campaigns and track how you use our websites. We carry out these activities based on our legitimate interest in marketing our own products or services and optimizing our websites.

When you visit our website, a Google cookie is automatically stored on your device. Using a pseudonymous identifier (ID) and based on the pages you visit, this cookie enables the display of interest-based ads, the measurement of the effectiveness of these ads, and other activities related to tracking your behavior on the site.

Further data processing takes place only if you have given Google your consent to link your browsing and app usage history to your account and to use information from your Google account to personalize the ads displayed on websites. If, in this case, you are logged into Google while visiting our website, Google will use your data in conjunction with Google Analytics data to create and define target groups for cross-device remarketing. To do this, Google temporarily combines your personal data with Google Analytics data to create target groups.

Since Google LLC is headquartered in the U.S. and uses technical infrastructure located in the U.S., it has joined the EU-U.S. Privacy Shield program to ensure the adequate level of personal data protection required by European regulations. Under the agreement between the U.S. and the European Commission, the latter has determined that Privacy Shield-certified companies provide an adequate level of data protection.

You can disable cookies used for remarketing in your Google account settings: <https://adssettings.google.com>. Additionally, you can disable the use of cookies for remarketing purposes in the cookie settings on our website.

If you are interested in details regarding data processing within Google Tag Manager, we encourage you to review Google's privacy policy: <https://policies.google.com/privacy>.

Facebook Pixel. We use marketing tools available on Facebook and provided by Facebook Inc., 1601 S. California Ave. Palo Alto, CA 94304, USA. Through these tools, we serve you ads on Facebook. We carry out these activities based on our legitimate interest in marketing our own products or services.

In order to serve you personalized ads based on your behavior on our website, we have implemented the Facebook Pixel on our pages, which automatically collects information about your use of our website, specifically the pages you view. The information collected in this way is typically transmitted to a Facebook server in the United States and stored there.

The information collected via the Facebook Pixel is anonymous, meaning it does not allow us to identify you. We only know what actions you have taken on our website. However, we would like to inform you that Facebook may combine this information with other information about you collected through your use of the Facebook service and use it for its own purposes, including marketing. Such actions by Facebook are no longer within our control, and you can find information about them directly in Facebook's privacy policy: <https://www.facebook.com/privacy/explanation>. You can also manage your privacy settings from your Facebook account.

Since Facebook Inc. is headquartered in the U.S. and uses technical infrastructure located in the U.S., it has joined the EU-U.S. Privacy Shield program to ensure the appropriate level of personal data protection required by European regulations. Under the agreement between the U.S. and the European Commission, the latter has determined that companies holding Privacy Shield certification provide an adequate level of data protection.

You can disable Facebook Pixel in the cookie settings available on our website.

Social media tools. Our websites use plugins and other social media tools provided by social media platforms such as Facebook, Twitter, Instagram, and Google.

When you view our website containing such a plugin, your browser establishes a direct connection to the servers of the social media administrators (service providers). The plugin content is transmitted by the respective service provider directly to your browser and integrated into the page. Through this integration, the service providers receive information that your browser has accessed our website, even if you do not have a profile with the respective service provider or are not currently logged in. This information (along with your IP address) is transmitted by your browser directly to the provider's server (some servers are located in the U.S.) and stored there.

If you are logged in to a social media platform, that platform will be able to directly associate your visit to our website with your profile on that platform.

If you use a specific plugin, e.g., by clicking the "Like" or "Share" button, the relevant information will also be sent directly to the provider's server and stored there.

Furthermore, this information will be published on the respective social media platform and will be visible to your contacts. The purpose and scope of data collection, as well as the further processing and use of the data by the service providers, along with contact options, your rights in this regard, and the ability to configure settings to protect your privacy, are described in the privacy policies of the respective service providers.

- Facebook – [https://www.facebook.com/legal/FB\\_Work\\_Privacy](https://www.facebook.com/legal/FB_Work_Privacy),
- Instagram – [https://help.instagram.com/519522125107875?helpref=page\\_content](https://help.instagram.com/519522125107875?helpref=page_content),
- Twitter – <https://twitter.com/en/privacy>,
- Google – <https://policies.google.com/privacy?hl=pl>.

If you do not want social media platforms to link the data collected during your visit to our website directly to your profile on that platform, you must log out of that platform before visiting our website. You can also completely prevent plugins from loading on the website by using appropriate browser extensions, such as script blockers.

#### Server logs

Using the website involves sending requests to the server where the website is hosted. Every request sent to the server is recorded in the server logs.

The logs include, among other things, your IP address, server date and time, and information about the web browser and operating system you are using. The logs are recorded and stored on the server.

The data recorded in the server logs is not associated with specific individuals using the website and is not used by us to identify you.

Server logs serve solely as auxiliary material for website administration, and their contents are not disclosed to anyone other than those authorized to administer the server.