

PRIVACY POLICY OF LOTTE WEDEL WEBSITE

Dear User,

LOTTE Wedel Sp. z o.o., based in Warsaw, takes the issue of protecting your privacy and personal data as a priority. Your safety is very important to us.

Our Privacy Policy describes the most significant aspects of processing your personal data - meaning the manner of handling your data obtained through our LOTTE Wedel website. We encourage you to read this document.

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I. DEFINITIONS

The terms used shall have the following meaning:

1. **LOTTE Wedel** or **we** - LOTTE Wedel Sp. z o.o. with its registered office in Warsaw, ul. Zamoyskiego 28/30, 03-801 Warsaw, entered in the Register of Entrepreneurs of the National Court Register, kept by the District Court for the Capital City of Warsaw XIII Commercial Division of the National Court Register under the number 0000340664, NIP 527-26-13-819, REGON: 142078650, share capital PLN 141,905,000.00;
2. **Personal Data** - any information relating to an identified or identifiable natural person; an identifiable person is a person whose identity can be determined directly or indirectly, in particular by reference to an identification number or to one or more specific factors defining their physical, physiological, mental, economic, cultural or social characteristics. Information is not considered to enable the identification of the person's identity if this requires excessive costs, time or activity;
3. **Privacy Policy** or **Policy** - means this privacy policy;
4. **GDPR** - Regulation (EU) No. 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;
5. **Website** - the website functioning on the Internet at the URL: <https://wedel.pl/> together with a set of all services available on the Website, enabling Users to use the offered functionalities of the Website;
6. **User** - any person visiting the Website.

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II. INTRODUCTORY INFORMATION

This Policy contains information about the terms and conditions of processing Users' Personal Data, the manner of collecting, securing and using the data, as well as Users' rights - and other information regarding the processing of Users' Personal Data by LOTTE Wedel in connection with the functioning of the Website.

The publisher, operator and controller of the Personal Data processed in connection with the functioning of the Website is LOTTE Wedel.

Please contact us in case of any questions or concerns about this Policy or related to the processing of your Personal Data:

✉ LOTTE Wedel sp. z o.o.
ul. Zamoyskiego 28/30
03-801 Warsaw
with a note "Personal Data"
@ dane.osobowe@wedel.pl

III. INFORMATION ON THE PROCESSING OF PERSONAL DATA

In this section of the Policy, we describe the manner of handling personal data collected through the Website. Users may use different functionalities of the Website, in which case the way we obtain and use data may differ. The Website only collects Personal Data that is necessary and relevant to the purposes for which it will be processed.

Whenever we ask you to provide any Personal Data, we will inform you of the terms and conditions of processing thereof.

We also encourage you to read other documents describing how LOTTE Wedel handles Personal Data. Additional information is available in the footer of the Website, in the "[Personal data protection](#)" tab.

USERS WHO ONLY VISIT THE WEBSITE

HOW DO WE COLLECT PERSONAL DATA OF USERS VISITING THE WEBSITE?

1. The Website collects data from Users automatically, in the form of ordinary system logs and information that the browser sends when presenting itself, i.e., data about the User's visit to the Website (IP address, domain name, browser type, operating system type, etc.).
2. The Website also uses "cookies" and similar technologies - hereinafter collectively referred to as Cookies. Users may decline Cookies, as well as access and delete Cookies stored in the memory of their browser using the appropriate browser's settings. Please note that in such a case, the use of certain features of the Website may become difficult or impossible.
For more information on Cookies, please refer to the separate document (Cookies Policy) available [here](#).
3. We do not correlate the data contained in system logs and Cookies with other information about Users. By visiting the Website, you remain anonymous until deciding otherwise.
4. Provision of data is voluntary, but failure to do so may result in difficulties or even impossibility of using the Website.

HOW DO WE USE PERSONAL DATA OF USERS VISITING THE WEBSITE?

1. If Personal Data is among the collected data, we process it for the fulfillment of our legitimate interests (Article 6(1)(f) GDPR), for the purpose of:
 - a) **ensuring** the proper and safe operation of the Website for the User and his/her device;

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- b) **assisting Users** in navigating the Website effectively and comfortably (adapting the Website to individual User settings and remembering the data entered by the User related to the use of the Website, such as the Website display language or the choice regarding the storage of Cookies);
 - c) ensuring various **functions**, including **monitoring and analyzing traffic, building statistics** for our own purposes (conducting statistical analysis on Users visiting the Website, such as number of views and statistics on interest in particular elements of the Website), which are used to identify errors, solve issues concerning the Website and its functioning, help to understand how Website Users use the Website, which enables us to improve and further develop the Website and serves to improve the effectiveness of our marketing activities.
The vast majority of such statistics are produced on the basis of non-personal data or anonymized data;
 - d) **simple marketing** of our own products or services, including organizing non-profiled (non-targeted) advertising campaigns and promotions.
2. In these cases, Personal Data is processed until the purposes of its collection (indicated above) are achieved, or until an effective objection to its processing is made, or until Cookies are deleted from the endpoint used by the User when connecting to the Website - whichever event occurs first.
 3. Some features of Cookies allow us to compile Users' Personal Data and create summaries on that basis, which we may later use to tailor the content and advertising provided to Users accordingly (based on Users' interests and preferences). At the same time, we would like to inform you that decisions based on the created profiles will not be made by automated decision-making systems.
 4. Where consent has been given (Article 6(1)(a) of the GDPR), we may also process your Personal Data collected through the Website in order to **present you with information about our offerings and marketing materials that are relevant or interesting to you**, tailored to your preferences and expectations. In this case, Personal Data is processed until the purpose indicated above is achieved, or until the consent is withdrawn, or until the Cookies are deleted from the endpoint used by the User when connecting to the Website - whichever event occurs first.

USERS CONTACTING LOTTE WEDEL USING THEIR CONTACT DETAILS

1. The Website contains our contact details which enable you to contact us.
2. Personal Data of Users contacting us are processed for the following purposes:
 - a) **responding to the User's inquiry.**
In order to provide a response, we require at least basic contact information (e.g., e-mail address or phone number). Providing this information is voluntary, but failure to do so will prevent us from replying to your question.
Basic contact data is processed for the purpose of our legitimate interests (Article 6(1)(f) of the GDPR), i.e., to contact the User and provide a response, until a response to the inquiry received has been provided or until a successful objection to the processing of the User's Personal Data has been made, whichever event occurs first.
If, when contacting us, the User provides us with additional data, such as name, surname, and additional contact information, we use these data to facilitate contact with the User, e.g. in the event that contact using the basic contact information is difficult or impossible. Provision of this data is voluntary, and failure to provide it does not result in any consequences for the User.
Additional Personal Data, obtained through the form, is processed based on the User's consent, expressed through a clear affirmative action (Article 6(1)(a) of the GDPR) - until a response to the inquiry received has been provided or until the consent given has been withdrawn, whichever

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event occurs first;

b) **providing quality services.**

We care about the quality of our services - we analyze every problem or irregularity reported. We may process information obtained from Users to improve the overall quality of our services, apply corrective actions and implement system solutions. For this purpose, we use anonymized requests, whereas the anonymization process itself being the processing of Personal Data.

Consequently, in order to provide the best quality service, we may process your Personal Data for the purpose of our legitimate interests (Article 6(1)(f) of the GDPR), in the form of taking care of the quality of our services, for the time necessary to anonymize a quality-related request;

c) **establishing, asserting or defending against claims.**

Moreover, we process the Personal Data from inquiries we receive for the purpose of pursuing our legitimate interests (Article 6(1)(f) GDPR) in the form of securing claims, until the statute of limitations for such claims under generally applicable law.

Providing Personal Data for the purposes indicated above is voluntary, but failure to provide basic contact information will prevent us from replying to your inquiry.

NEWSLETTER SUBSCRIBERS

1. Our Newsletter includes information about us, our current offerings, activities and initiatives. These are promotional and informational activities, and since the Newsletter is sent electronically, additional consent is required to send it in order to comply with electronic privacy regulations.
2. Providing Personal Data, subscribing to the Newsletter as well as agreeing to send promotional and informational materials electronically are voluntary, but failure to do so prevents us from sending the Newsletter.
3. We process the Personal Data of our Newsletter Subscribers for the following purposes:
 - a) **distribution of newsletters**, i.e., conducting direct marketing activities, on the basis of the subscribers' consent expressed through a clear affirmative action of sending us a newsletter subscription form with the consent expressed (Article 6(1)(a) GDPR) - until any consent (for processing personal data or for receiving marketing and information materials electronically) has been withdrawn;
 - b) **establishing, asserting or defending against claims.**

Moreover, we process the Personal Data of Newsletter Subscribers for the purpose of pursuing our legitimate interests (Article 6(1)(f) GDPR) in the form of securing claims, until the statute of limitations for such claims under generally applicable law.

COMMENTING ON "IN THE KITCHEN WITH WEDEL"

1. On "In the Kitchen with Wedel" we enable Users to leave their opinions and comments on the recipes we publish.
2. Posting a comment does not require providing Personal Data, however, if you include your Personal Data in the form when sending us the comment, we will process them in connection with publishing the comment. Not providing personal data does not prevent the comment from being sent and published.
3. We process the Personal Data of Users who send us feedback for the following purposes:
 - a) **publishing a comment with an opinion**, i.e. establishing and maintaining contact with the User and enabling the exchange of experiences between Users (persons sharing experiences and opinions with LOTTE Wedel), based on the User's consent expressed through a clear confirmatory action consisting in sending us an opinion form containing personal data (Article 6 (1)(a) of the GDPR) -

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until the consent is withdrawn or the comment is deleted (e.g. in connection with the deletion of the subpage with the recipe commented on by the User), depending on which event occurs first;

b) **providing quality services.**

We care about the quality of our services - we analyze every problem or irregularity reported. We may process information obtained from Users to improve the overall quality of our services, apply corrective actions and implement system solutions. For this purpose, we use anonymized requests, whereas the anonymization process itself being the processing of Personal Data.

Consequently, in order to provide the best quality service, we may process your Personal Data for the purpose of our legitimate interests (Article 6(1)(f) of the GDPR), in the form of taking care of the quality of our services, for the time necessary to anonymize a quality-related request;

LOTTE WEDEL AND SOCIAL MEDIA

HOW DO WE WORK WITH SOCIAL MEDIA PROVIDERS?

1. We have our own social media pages:
 - a) fan page on the Facebook.com platform and a profile on the Instagram.com platform.

The provider of the Facebook.com and Instagram.com platforms is Meta Platforms Ireland Ltd (formerly: Facebook Ireland Ltd; “**Facebook**”).

The purpose and scope of collecting Personal Data, further processing and use by Facebook, as well as your privacy rights and settings, can be found in Facebook’s privacy policy: <https://www.facebook.com/policy.php>.

Considering our collaboration with Facebook and the fact of joint control over Personal Data, you have the right to obtain an extract of the arrangements made by Facebook and LOTTE Wedel with respect to the joint control conducted. An extract of the most important information is available at: https://www.facebook.com/legal/controller_addendum;
 - b) YouTube.com channel.

YouTube is a service provided by Google Ireland Limited (“**Google**”).

The purpose and scope of collecting data, further processing and use by Google, as well as your privacy rights and settings, can be found in Google’s privacy policy: <https://policies.google.com/privacy?hl=pl>.
2. As part of our social media pages, some of the User information are collected directly from the Users, and the remaining part from their User Profiles on these platforms:
 - a) to the extent that we obtain information directly from the User, the provision of Personal Data is completely voluntary, and the failure to provide it has no negative consequences for the User.

You may use the Website and LOTTE Wedel’s social media profiles without providing any Personal Data and remaining anonymous at all times (when browsing the Website or any of LOTTE Wedel’s profiles on these portals without interacting with these profiles);
 - b) to the extent that we obtain information from your social media profile (in connection with your interaction with LOTTE Wedel’s profile located on these social media sites), disclosure will be made of all Personal Data posted to your profile that is marked “Public” or that you expressly make available to LOTTE Wedel through your profile by configuring your privacy settings so that we can review it. LOTTE Wedel may also obtain anonymous statistical summaries from social network providers, prepared taking into account the User’s data.

HOW DO WE USE PERSONAL DATA OF USERS OF LOTTE WEDEL SOCIAL MEDIA?

1. We use Personal Data obtained through social media to **create analyses, statistics and summaries** to

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improve the effectiveness of our activities and build development strategies.

The vast majority of such statistics are produced on the basis of non-personal data or anonymized data. In the event that Personal Data is used for this purpose, the processing will be done for the purpose of pursuing our legitimate interests (Article 6(1)(f) of the GDPR) in the form of carrying out analytical and statistical activities aimed at our development, until the above purpose is fulfilled or until an effective objection to the processing of Personal Data is raised, whichever event occurs first.

2. The Personal Data disclosed by the User as part of his/her social media profile will also be processed for the purpose of **establishing and maintaining contact** with the User and **exchanging information about LOTTE Wedel and our initiatives**, as well as informing **about activities, contests and raffles organized by us** - i.e., for the purpose of pursuing our legitimate interests (Article 6(1)(f) of the GDPR) in the form of providing contact and exchange of information, until an effective objection to the processing of Personal Data is made, or until such Personal Data is deleted from the User's profile, whichever event occurs first).
3. In connection with the operation of social networks, User profiling may be performed, i.e., the creation of a profile containing information about the User's interests or certain characteristics. Some features offered by social media providers allow us to compile Users' Personal Data and create summaries and statistics on that basis, which we may later use to tailor the content and advertising provided to Users accordingly. At the same time, we would like to inform you that decisions based on the created profiles will not be made by automated decision-making systems.

IV. WHO CAN ACCESS USERS' PERSONAL DATA?

1. User Personal Data may be accessed by entities that cooperate with LOTTE Wedel, including our service providers (e.g., those providing hosting or IT support services as well as our IT systems, agencies supporting our marketing activities), based on relevant agreements entered into with those entities.
2. We may also disclose Users' Personal Data in cases where the User has consented to such disclosure (e.g., in the case of Personal Data contained in Cookies that the User has accepted and whose provider is a third party) or where such disclosure is necessary for the provision of services by LOTTE Wedel (e.g., in the case of social media, your Personal Data can also be accessed by the provider of the social media platform on which we manage our page).

In some cases, LOTTE Wedel exclusively allows third-party providers to post their own codes on the Website, which (subject to the User's expression of appropriate consents) allow these providers to, for instance, analyze the User's activity or display advertisements tailored to the User's interests or preferences. We do not process the data collected through such Cookies, including Personal Data, and do not have access to such data - such providers are the only data controllers.

3. Users' Personal Data may also be shared with authorized bodies, in particular to the judicial authorities, in cases indicated by the law (e.g., in the event of a reasonable suspicion that a User has committed a crime on the Website or at the request of authorized bodies under applicable law).

V. TRANSFER OF PERSONAL DATA OUTSIDE THE EEA (EUROPEAN ECONOMIC AREA)

The entities we work with are primarily based in countries in the European Economic Area (EEA) or in Switzerland, recognized as a country that meets an adequate level of personal data protection.

Some of our suppliers and service providers that we work with, such as Google LLC, are based outside the EEA. We transfer Personal Data outside the EEA only when absolutely necessary and only to countries that provide an adequate level of protection for Personal Data or after prior verification to ensure that these entities provide guarantees of a high level of protection for Personal Data.

These guarantees derive, in particular, from the obligation to apply the standard contractual clauses

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adopted by the Commission (EU) or participation in the Data Privacy Framework program established under Commission Implementing Decision (EU) 2023/1795 of July 10, 2023, based on Regulation (EU) 2016/679 of the European Parliament and of the Council, stating the adequate level of personal data protection provided under the EU-US Data Protection Framework.

VI. PERSONAL DATA SECURITY

1. LOTTE Wedel undertakes to protect Personal Data in accordance with applicable regulations, in particular not to disclose such data to third parties and to process it only for the purposes specified in this Policy and generally applicable laws.
2. Personal Data shall be protected against unauthorized access by unauthorized persons, unauthorized taking, destruction, loss, damage or alteration, and processing in violation of generally applicable laws. LOTTE Wedel uses appropriate security measures to protect Personal Data. These include internal controls over collected Personal Data, storage and processing procedures, and physical and IT security measures to protect against unauthorized access to systems where Personal Data is stored.

VII. USER RIGHTS

1. In connection with our processing of your Personal Data, as a User you have the following rights:
 - a) the right to request **access to the content of your Personal Data**, as well as to obtain a copy thereof;
 - b) the right to request **rectification of your Personal Data** if, in your opinion, the data is incorrect or incomplete;and, in cases provided for by law, also:
 - c) the right to request the **deletion of your Personal Data**;
 - d) the right to request **restriction of the processing of Personal Data**;
 - e) the right to **transfer your Personal Data**;
 - f) the right to **object to the processing of Personal Data**.

To exercise the above-mentioned rights, please contact us using the details indicated in Section II of this Policy.

2. You have the right to **withdraw the consents** you have **given** on the basis of which your Personal Data is processed, as well as consents for the use of your e-mail address or telephone number for marketing purposes. Please note that withdrawal of consent does not affect the legality of any action taken prior to the withdrawal of consent.

To withdraw your consent or consents, please send an e-mail with the relevant information on this subject to the e-mail address: dane.osobowe@wedel.pl.

3. You also have the right to **file a complaint** if you believe that our processing of your Personal Data violates the provisions of the GDPR. A complaint should be lodged with the supervisory authority, which, as of May 25, 2018, is the President of the Office for Personal Data Protection.
4. More details can be found [here](#).

VIII. EXTERNAL LINKS

The website may contain links to other sub-sites and external sites or services, including those of suppliers other than LOTTE Wedel.

We have no influence on the functioning or content of the website located at the link if it is a service of an external provider - such services operate independently of LOTTE Wedel. For more information about how a linked third-party website operates and how the third-party service provider uses your data, we encourage you to read the privacy policies published by these providers.

IX. FINAL INFORMATION

The Website includes the current Policy version.

This Policy may be updated from time to time. If updated, a new version of the Policy will be published on the Website.

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