

## **Privacy policy and cookie policy**

### **§1. General provisions**

1. This Privacy and Cookie Policy (hereinafter: Policy) sets out the rules for the processing of personal data and the use of cookies on the website <https://hairandhair.pl/> and its subpages (hereinafter: Website) operated by Natalia Kuklińska, conducting business activity under the name HAIR& HAIR Gabinet Trychologiczny Natalia Kuklińska, ul. Ruczaj 17a lok. LU B, 30-409 Kraków, with NIP: 9452246247, REGON: 389500445 (hereinafter: HAIR&HAIR).
2. Personal data is information about an identified or identifiable natural person ('data subject'). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
3. Personal data collected by HAIR&HAIR through the Website is processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016. on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter: GDPR).
4. HAIR&HAIR makes every effort to protect privacy and the information provided therein. HAIR&HAIR selects and applies appropriate technical measures, including programming and organisational measures, to ensure the protection of personal data being processed, in particular to protect data against unauthorised access, disclosure, loss and destruction, unauthorised modification and illegal processing.
5. HAIR&HAIR informs that the use of the Website requires the use of the public Internet network. HAIR&HAIR points out that the use of the Website may involve risks related to third-party interference in the transmission of data sent via the Internet between the Website and its user.

### **§2. Processing of personal data**

1. The administrator of personal data processed in connection with the use of the Website is Natalia Kuklińska, conducting business activity under the name HAIR&HAIR Gabinet Trychologiczny Natalia Kuklińska, ul. Ruczaj 17a lok. LU B, 30-409 Kraków, with Tax Identification Number (NIP): 9452246247, REGON: 389500445 (hereinafter: Administrator).
2. The controller has not appointed a Data Protection Officer. In matters related to the processing of personal data, you may contact the controller at the address of the registered office indicated in section 1 above or by e-mail at [info.hairandhair@gmail.com](mailto:info.hairandhair@gmail.com).
3. The Administrator processes personal data within the Website for the following purposes, scope and legal basis:
  - 1) in order to provide access to content posted on the Website – personal data related to activity on the Website, i.e. information about viewed content, data about device sessions, operating system, browser, location, unique ID, IP address – pursuant to Article 6(1)(b) of the GDPR;
  - 2) in order to respond to a request from a Website user in connection with their contact with the Administrator – personal data provided in the message content – pursuant to Article 6(1)(f) of the GDPR (the legitimate interest in this case is to ensure contact with persons interested in the activity and to maintain ongoing communication);
  - 3) in order to keep statistics on the use of individual functionalities of the Website, facilitate the use of the Website and ensure the IT security of the Website - personal data concerning activity on the Website and the amount of time spent on each subpage of the Website, search

- history, location, IP address, device identifier, data concerning the web browser and operating system – pursuant to Article 6(1)(f) of the GDPR;
- 4) for the purpose of establishing, investigating and pursuing claims and defending against claims in court proceedings and before other enforcement authorities – personal data provided in connection with the use of the Website – pursuant to Article 6(1)(f) of the GDPR;
  - 5) for the purpose of marketing its own products and remarketing – email address, data on activity on the Website, including activity recorded and stored using cookies, in particular activity history, services ordered, search history, activity history on the Website. For remarketing, the Controller uses data about activity on the Website to deliver marketing messages outside the Website and uses the services of external providers for this purpose. These consist of displaying the Controller's messages on websites other than the Website – pursuant to Article 6(1)(a) of the GDPR.
4. Furthermore, the personal data of Website users may be processed for the purposes of administering and managing the website and groups on social media platforms (including Facebook and Instagram) in the case of data processing on these social media platforms. This data will only be processed if the user decides to like the account/join the group/select the "Follow" option or otherwise leave their data on the HAIR&HAIR account on the above-mentioned portals, e.g. in the form of a post or comment.
  5. The recipients of personal data may be entities cooperating with the Controller in the scope of services provided to the Controller (e.g. subcontractors) or supporting the Controller's current business processes, such as entities providing operational and IT services, including hosting and e-mail services. These entities act on behalf of the Controller or independently determine the purposes and means of data processing.
    - a) The entities referred to in paragraph 5 above may operate within the EEA and in third countries, therefore it is possible to transfer personal data of Website users to third countries (outside the EEA), but only to recipients who guarantee data protection and security, including through:
      - b) cooperation with entities processing personal data in countries for which the European Commission has issued a decision confirming an adequate level of protection,
      - c) the use of standard contractual clauses issued by the European Commission or by a supervisory authority and approved by the European Commission.
  - 1) Personal data will be stored:
    - 2) personal data collected in connection with the provision of services will be processed for the duration of the provision of services, and after that time for the lifetime of cookies in accordance with the information contained in the cookie information;
    - 3) data collected via the contact form – data contained in the message will be processed for the duration of the response period, and thereafter for a period of 3 years for evidentiary purposes and to defend against claims, subject to points 3 and 4 below;
    - 4) data processed on the basis of the Controller's legitimate interest – will be processed until an objection is raised;
    - 5) data processed on the basis of consent – will be processed until consent is withdrawn.
  6. Informuję, że zasady odnoszące się do strony/fanpage'a/grupy ustala Administrator, natomiast zasady korzystania z portalu społecznościowego, na którym umieszczona jest strona/fanpage/grupa ustala podmiot zarządzający tymi portalami.
  7. In accordance with the GDPR, the data subject has the right to:
    - 1) request access to your personal data, which includes the right to:
    - 2) request the rectification of your personal data;
    - 3) request the deletion of your personal data;
    - 4) request restriction of processing of personal data;

- 5) object to the processing of personal data;
- 6) request the transfer of personal data.

The controller shall respond to the request of the data subject without undue delay, and in any case no later than one month after receiving the request. The one-month period referred to in the previous sentence may be extended if necessary due to the complexity or number of requests.

8. In the case of personal data processing based on consent, the data subject may withdraw their consent to the processing of personal data. Withdrawal of consent to the processing of personal data does not affect the lawfulness of processing based on consent before its withdrawal.
9. If the data subject considers that the processing of their personal data infringes the GDPR, they have the right to lodge a complaint with a supervisory authority, in particular in the Member State of their habitual residence, place of work or place of the alleged infringement. In Poland, the supervisory authority within the meaning of the GDPR is the President of the Personal Data Protection Office.
10. Providing certain personal data is a prerequisite for using specific services and functionalities of the Website (mandatory data). The Administrator marks mandatory data. Failure to provide such data will result in the inability to provide specific services and functionalities. Apart from data marked as mandatory, providing other personal data is voluntary.

### **§3. Joint administration – Facebook and Instagram**

1. HAIR&HAIR maintains accounts on the social media platforms Facebook and Instagram.
2. The administrator of data processed for statistical purposes collected via Facebook and Instagram is Natalia Kuklińska, conducting business activity under the name HAIR&HAIR Gabinet Trychologiczny Natalia Kuklińska, ul. Ruczaj 17a lok. LU B, 30-409 Kraków, with tax identification number (NIP): 9452246247, REGON: 389500445 (hereinafter: Administrator) and Meta Platforms Ireland Limited, with its registered office at 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (hereinafter: Co-administrator). These data are processed on the basis of joint administration by the above-mentioned entities. Detailed rules regarding joint data administration, including information about your rights, are described at <https://www.facebook.com/business/help/144825579583746?id=939256796236247>.
3. The Administrator processes data on its Facebook and Instagram social media accounts based on the Administrator's legitimate interest, i.e. pursuant to Article 6(1)(f) of the GDPR, consisting in analysing user activity and preferences in order to improve the functionalities used and services provided.
4. In matters relating to personal data, you may contact both the Controller and the Joint Controller.

### **§4. Cookies**

1. Cookies are small packets of IT data, in particular small fragments of text, which are stored on the end devices (e.g. smartphones, computers) of Internet users by websites, including the Website, which they visit. Cookies contain a range of information that is often necessary for the proper functioning of websites (hereinafter: Cookies).
2. Cookies are used when browsing the Website.
3. The cookies used by the Administrator are safe for the devices of the Website users.
4. The use of certain cookies may require consent, which may be given by the Website User when first accessing the Website. Consent may be withdrawn at any time in the cookie settings available on the Website pages.
5. Every web browser allows you to disable cookies for a specific website or for all websites.
6. Website users may change their cookie settings at any time in their web browser settings. Users may block automatic cookie handling completely or impose restrictions. Users may also browse

the Website using the private browsing (incognito) option, in which cookies are deleted when the browser window is closed.

7. The Administrator informs that restricting the use of Cookies may affect certain functions of the Website.
8. Declaration regarding Cookie files used on the Website:

#### **§ 5. Changes to the Privacy Policy**

1. The Privacy Policy may be subject to change, of which the Administrator will inform users of the Website.
2. The privacy policy is effective from 1 January 2026.