

PRIVACY POLICY

This Privacy Policy outlines the principles governing the processing of personal data by the Service, including the legal grounds, purposes, scope of personal data processing, and the rights of individuals whose data is processed.

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I. Data Controllers

We hereby inform you that the controllers of your personal data are:

1. FDCOM E-COMMERCE S.A., with its registered office in Warsaw (02-517), Komedy 2/3, registered in the National Court Register maintained by the District Court for the capital city of Warsaw under the number KRS 0001147589 and
2. FOODCOM S.A., with its registered office in Warsaw (02-517), Komedy 2/3, registered in the National Court Register maintained by the District Court for the capital city of Warsaw under the number KRS 0000527828,

(collectively referred to as "the Companies").

You may contact the Companies:

- a. in writing at the above-mentioned registered office address
- b. via email at: foodcom@foodcom.pl
- c. by telephone at: +48 22 652 36 59

In this document, "Service" refers to the online service fdcm.eu, and "Profiles" refers to profiles on social media platforms such as Facebook or LinkedIn.

II. Purposes and Legal Grounds for Processing Personal Data

The Companies process your personal data only where at least one of the conditions for lawful processing, as set forth in the Regulation (EU) 2016/679 of the European Parliament and the Council of April 27, 2016, on the protection of individuals with regard to the processing of personal data and the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as "RODO"), is met.

In all cases, providing personal data is voluntary, however, it is a prerequisite for establishing cooperation with the Companies and for the execution of contracts with you.

The specific purposes and legal grounds for processing personal data are detailed in the table below.

Reason of Data Processing	Purpose of Data Processing	Legal Basis for Data Processing	Data Retention Period
Business Contacts	Direct marketing of the Companies' products and services; establishing and maintaining business contacts, thereby expanding the scope of the Companies' activities; enhancing the quality of products and services offered by the Companies; pursuing claims or defending against claims.	Consent of the data subject (art. 6 ust. 1 lit. a RODO) Realization of the Companies' legitimate interests (art. 6 ust. 1 lit. f RODO).	Duration of business contacts, until it is determined that further processing is no longer necessary for the purpose for which it was processed.
Sale Agreement	Execution of contracts concluded between you and the Companies; fulfillment of tax and accounting obligations of the Companies; direct marketing of the Companies' products and services; enhancing the quality of products and services; establishing and	Necessity for the performance of the contract (art. 6 ust. 1 lit. b RODO); Legal obligation of the Companies (art. 6 ust. 1 lit. c RODO); Realization of the Companies' legitimate	Duration of the performance of the contract, and, for accounting documents, retention period as required by law.

	maintaining business contacts; pursuing claims or defending against claims.	interests (art. 6 ust. 1 lit. f RODO).	
Representation of Contractors	Verification of the correctness of the representation of the Companies' contractors; execution of contracts between the entity you represent and the Companies; fulfillment of tax and accounting obligations; direct marketing of the Companies' products and services; establishing and maintaining business contacts; enhancing product and service quality; pursuing claims or defending against them.	Consent of the data subject (art. 6 ust. 1 lit. a RODO); Realization of the Companies' legitimate interests (art. 6 ust. 1 lit. f RODO).	Duration of the contract execution between the represented entity and the Companies. For accounting documents, retention period as required by law.
Use of Services and Profiles	Management of the Services and Profiles; provision of information regarding offers, products, and services of the Companies; marketing of the Companies' products and services; responding to inquiries, enabling feedback or comments; business correspondence; sending newsletters; handling complaints and pursuing or defending against claims.	Consent of the data subject (art. 6 ust. 1 lit. a RODO); Realization of the Companies' legitimate interests (art. 6 ust. 1 lit. f RODO).	Duration of use of the Services or Profiles, and for the newsletter service, until the subscription is canceled.

III. Categories of Data Recipients

Your personal data may be disclosed to:

1. Entities providing services to the Companies, including legal advice, tax consulting, accounting, debt collection, IT support, management of the Services and Profiles, auditing, shipping, transport, and delivery.
2. Entities authorized by law, such as regulatory authorities, prosecuting authorities, tax authorities, and courts.
3. Financial institutions providing funding for the Companies' operations or holding the Companies' bank accounts.
4. Payment processors handling traditional (bank transfers), electronic (e.g., Pay U), or card payments, to the extent necessary for payment processing.
5. Other entities, as specified by applicable law.

IV. Transfer of Data Outside the European Union

The Companies do not transfer your personal data to entities outside the European Economic Area (EEA).

V. Rights of the Data Subject

1. **Right of access, rectification, restriction, deletion, or transfer of data** – You have the right to request access to your personal data, its rectification, deletion ("right to be forgotten"), restriction of its processing, or its transfer. The detailed conditions for exercising these rights are outlined in Articles 15-21 of the RODO.
2. **Right to withdraw consent at any time** – You have the right to withdraw your consent to the processing of your personal data at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
3. **Right to object** – You may object to the processing of your personal data at any time. The objection may concern the purposes mentioned in Article 6(1)(e) and (f) of the RODO, i.e., the legitimate interest or public task of the Companies. If you object, the Companies will cease processing the specified personal data, unless there are overriding legitimate grounds for processing.
4. **Right to lodge a complaint with a supervisory authority** – You have the right to lodge a complaint with the supervisory authority, as outlined in the RODO and the

Personal Data Protection Act. The supervisory authority is the President of the Personal Data Protection Office.

This translation of the Privacy Policy is provided for informational purposes only. In case of discrepancies, the original Polish version is legally binding.