

# Privacy Policy

This privacy policy (“**Privacy Policy**”) sets out how **the Polish Vodka Foundation**, with its registered office in Warsaw, at ul. Złota 59, 00-120 Warsaw, entered into the Register of Associations, Other Social and Professional Organizations, Foundations and Public Health Care Institutions and the Register of Entrepreneurs kept by the District Court for the city of Warsaw, 12th Economic Division of the National Court Register under KRS no.: 0000593987, NIP (tax identification no.): 5252642143, REGON (business registry no.): 363449747 (**the “Foundation” or “we”**), respects the users’ privacy rights when they use digital media (our websites, phone applications, social media websites, and any online forms) and communicate with us via electronic means. Thus, we have drawn up this Privacy Policy to notify the users how the Foundation collects, stores, uses and processes the Personal Data provided to us via the digital media managed by the Foundation (“**Digital Media**”).

Before using our Digital Media, the user should carefully read this Privacy Policy. If the user does not consent to the Privacy Policy, then they are asked not to use the Digital Media. We reserve the right to change the Privacy Policy due to important reasons, that is to adapt the Privacy Policy to the solutions provided by the law or when a change is necessary due to a decision made by a court or other competent public authority body or in order to implement new technical means to protect privacy or when it is necessary due to technical reasons connected with the provision of services for you or when such a necessity stems from the changes in the scope of the services offered via the Website. However, the changes shall not decrease the protection level of the Personal Data or extend the scope or the purpose of the data processing for which the user had given their Personal Data unless we obtain the user’s consent or it shall be applicable according to the law. We encourage the user to regularly read the Privacy Policy and the Cookie Policy to learn about any potential changes and the manner of permitted use of the users’ data.

The Foundation is the Administrator for all Personal Data given to the Foundation.

## 1. What Personal Data do we collect and how to we do it?

For the purposes of this Privacy Policy the “**Personal Data**” shall mean all and any information concerning the identified or identifiable natural person, including the information allowing us to make contact with that person via electronic means or otherwise (offline or online). The data includes: first and last name, postal address, e-mail address, phone number (“**information allowing us to identify the person**”), demographic data, such as date of birth, sex, age, as well as habits and preferences when such information is connected with the information allowing us to identify the person.

The Personal Data is collected only after having informed the user of that fact (when the user has voluntarily given their data online via our Digital Media) when the user wanted to use the functions and services offered. Usually, it is connected with:

- Registration or subscription to Digital Media: for instance, via a newsletter subscription to a particular Digital Medium, respectively or during setting up an account to obtain club member status;
- The “Send to a friend” function;
- A lottery or contest;
- Joining the loyalty program;
- Organizing events (via invitation or forms);

- Using interactive devices located in the Museum premises (for instance, a photo booth);
- Responses, questions or comments via the contact form;
- All and any other requests that require stating one's Personal Data.

The Personal Data collected in connection with the above functions vary in type and quantity, depending on the given activity. The requested Personal Data may include: first and last name, e-mail address, home address and phone number (home or office number). With some activities, it may also be required to create a username, a password or state additional data, including: (i) age and date of birth, (ii) sex, (iii) frequency of use, (iv) information concerning the household, lifestyle, or domicile, or (v) other essential information.

Subject to the requirements of the applicable law, we can use different technologies to collect and state the information on the access to our Digital Media and the manner of using it, as well as the demographic data of those who use our Digital Media obtained from third parties, such as Google or the social media used ("**Information on the Use**"). Such information may include information on visited websites, duration of the visits, access or giving particular information on drinks and other content, the language of the website viewed, demographic data (including age, sex and interests, respectively), as well as visits to websites before visiting the current website so that we can gather more information on the interactions between the users and our brands to adjust and improve our services. Generally, most of the collected Information on the Use cannot be linked to a particular user but if such information can be linked to a given user then it shall be treated as the user's Personal Data, in accordance with this Privacy Policy.

## 2. How do we use the tracking technologies, and why?

The Foundation uses such tracking technologies as: cookie files, IP addresses or log files in order to collect certain data, such as browser type, operating system, referrers, the user's path on the website, name of the Internet provider domain, etc. to improve the use and functionality of our Digital Media and to increase our awareness on how the visitors use our Digital Media, as well as the tools and services offered via such Digital Media. The tracking technologies allow us to adapt our Digital Media to the individual needs of the users.

- Subject to the user's consent, if there is such a legal requirement, our Digital Media use cookie files and similar tracking technologies ("**Cookie Files**"). Cookie Files are small files saved on the user's device that are used for various purposes. For instance, they allow the user to freely browse websites, they record the user's preferences and improve the activities performed by the users. We use such files to improve the use and functionality of our Digital Media and to increase our awareness of how the users use our Digital Media, as well as the tools and services offered via such Media. Use of the Cookie Files in our Digital Media provides more harmonious visits for the users and allows us to more accurately assess their activities in our Digital Media. More information on the Cookie Files we use and the manner of disabling them is provided in the Cookie Policy.
- The IP address is a number used by computers within a network to identify the user's computer during every logging onto the Internet. We can track IP addresses in order to: (i) solve technical problems, (ii) provide safety and protection for the website, (iii) limit access to our Digital Media for some users, and (iv) increase our awareness on how the users use our Digital Media;
- We (or third parties on our behalf) may collect data in the form of log files that record the activities of our Digital Media and keep records on browsing habits. They are generated anonymously and allow us to collect data on: (i) the type of the user's browser and operating system, (ii) the user's

sessions (including their own URL address, date and time of accessing our Digital Media, and on the websites visited by them, together with the duration of such visits), and (iii) other similar data on Internet-surfing or the data on the history of the visited websites (click-stream). We also use the information collected in log files for our internal marketing and demographic research so that we can constantly improve and adjust the services we provide online. The log files are used only for external purposes and are not connected with any particular user.

### 3. Why do we use Personal Data?

All the collected Personal Data is used for the purpose for which it has been given to us or in line with the Privacy Policy. Those purposes include:

- During registration or subscription to our Digital Media: the Personal Data given are to offer the user the benefits and privileges usually connected with the registration, including the possibility of obtaining information selected during the registration process or that which is automatically connected with the registration process (including newsletter subscription, setting up the account, participation in contests, invitations to the event organized by the Foundation or participation in such an event);
- The “Send to a friend” function: the Personal Data for single functions (usually first and last name, e-mail address) is used once (for instance, to send information) and is not further stored by us;
- When using the QR Code placed in the promotional materials for the Foundation: we use the Personal Data to send more information on the Foundation’s operations to the users;
- Responses, questions or comments on compliance via the contact form or the notification system (“Contact us”): when contacting via the online contact form, the given data is used for sending replies to the question or the comment.

Apart from the purpose for which the user had given their Personal Data in the first place, there is also the possibility of making a choice (by ticking a respective box or otherwise) to express the user’s consent to the use of the Personal Data for the activities or services other than the requested activity or the main service the user requested. For instance, when taking part in a contest or a different promotional campaign, the user may be given an option to subscribe to the newsletter or to notifications on the operations of the Foundation sent via the Digital Media used for the promotional campaign or from other websites. If the user selects such additional services, the Personal Data they gave shall be used to provide the abovementioned services.

We can use the e-mail address to send administrative information (for instance, a confirmation e-mail during registration or canceling subscription), as well as for some announcements connected with the services (for example, notifications on updating the Privacy Policy, changes to our service policy or online technical support or other related changes) or promotional information (subject to the additional consent of the user if such a legal requirement exists).

We can also use the Personal Data or demographic data of the users for our internal marketing and demographic research in order to constantly improve, personalize and adjust the offered services so that we can meet the user's needs.

Subject to the currently effective legal requirement, this may involve occasional linkage, update or other type of extensions to the Personal Data collected via Digital Media with the data received from external sources or from third parties. For instance, we can link strictly demographic data or survey

data (on the age, sex, household, other interests, etc.) that is not linked with the user's Personal Data with the Personal Data collected on different occasions (for instance, during account registration).

#### 4. What happens if the user does not consent to give their Personal Data

If the user decides not to give their Personal Data when they are asked to do so, the user may not have the possibility to participate in some activities and personalized functions related to our Digital Media, and the services and promotional actions offered to them may be limited. For instance, if the user refuses to give their e-mail address, they cannot receive our newsletters and they cannot register with our Digital Media in a different manner. However, in order to browse our Digital Media and to learn more about the Foundation, giving one's Personal Data is not necessary.

#### 5. To whom do we disclose the Personal Data and why?

The Foundation never discloses the user's Personal Data to any third parties who intend to use it for direct marketing purposes unless the user has been explicitly informed about that fact and the user expressed their consent.

The Foundation may disclose the user's Personal Data to third parties, but only in the following instances:

- We may use the services furnished by third party service providers, including support in administering the Digital Media or while conducting activities for which the Personal Data is being collected (for instance, while organizing contests and promotional campaigns). Each of these service providers is obliged to ensure the safety of the Personal Data for the entire period and to the same extent as the Foundation, and partnering with such a provider shall take place on the basis of a written agreement binding the service provider to keep the Personal Data confidential and process it only for the purposes of completing the task commissioned by the Foundation;
- When we run a joint or jointly sponsored program or a promotional campaign in our Digital Media together with a different third party or an organization and under such a program or campaign we collect and process the Personal Data, which we can disclose to our partner or sponsor. If the Personal Data is collected (or disclosed) by a different party or for the benefit of such a party under the promotional campaign, we shall notify the user about it when collecting the Personal Data;

When conducting a promotional campaign with the participation of another party, we can provide a separate link to the Privacy Policy of that party and we suggest reading it before giving your Personal Data since we cannot guarantee that the party uses the same practices concerning privacy. If the user does not want their Personal Data to be collected or be disclosed by a party other than the Foundation, or for the benefit of such a party, the user can make such a decision during the collection of the Personal Data / when they are asked to give their Personal Data;

- We can also disclose the user's Personal Data if it is required by the law or if in our opinion, acting in good faith, such an action is reasonably necessary to meet the legal requirements, to respond to any claims or in order to protect the safety or rights of the Foundation, its customers or the general public;
- We can also disclose the demographic or survey data to third parties, but such data is anonymous and does not include any Personal Data. The collected data that we disclose may include the anonymous data collected with the use of Cookie Files, as indicated in article 2.

#### 6. How long do we store the Personal Data?

The Personal Data transferred to us via the Digital Media is stored in our databases. We store it for the period necessary for us to achieve the purpose for which the data was transferred to us (for instance, if the user has transferred personal data to us so that we can send them the newsletter, then the personal data shall be processed as long as we offer sending newsletters to the users).

Thus, we can store the Personal Data for a reasonable period of time, also after the user ceases to use the services of the Foundation or our Digital Media. After the lapse of that period, the users' Personal Data shall be deleted from the systems of the Foundation. There may also arise the need for the Personal Data to be stored for a reasonable period of time and as long as it shall be necessary to meet the obligations imposed on the Foundation by the provisions of the law, to resolve disputes, enforce execution of the agreement and for other similar purposes (for instance, to meet the obligations that stem from the tax law it may be necessary to store the Personal Data given while joining a contest and necessary for sending the prize at the end of the contest).

After the lapse of that period, the users' Personal Data shall be deleted from the systems of the Foundation.

If the user requests us to cease using the Personal Data for the purposes of providing the services, including the e-mail cancellation request, they should contact us in the manner described in article 8. Note that users have the right to request us to delete their Personal Data at any time, in line with article 8.

## **7. How do we protect the users' Personal Data**

The Foundation uses all necessary technical and organizational means to provide confidentiality and protect the users' Personal Data that is collected via our website or our applications. The above activities include: (i) storing the Personal Data in conditions enabling their safe use, making it unavailable to the public and available only to the authorized employees of the Foundation and the service providers who partner with us and who have signed respective agreements binding them to protect the Personal Data and maintain their confidentiality; and (ii) verification of identity of the registered users before granting them access to the Personal Data.

## **8. How to access gained to one's Personal Data, to correct, delete or refuse its processing?**

The user can gain access to their Personal Data processed by us by contacting us at: [kontakt@muzeumpolskiejwodki.pl](mailto:kontakt@muzeumpolskiejwodki.pl).

The user can also contact us to make the following choice:

- They can request their Personal Data be corrected if it is inconsistent, incomplete or obsolete, or request its deletion.
- They may not give their Personal Data to us or not consent to its processing due to justifiable reasons. However, if the user chooses this option, they shall not be able to use some services offered by us.
- If the user cancels the newsletter subscription, receiving notifications or other information or services via Digital Media, then the user is asked not to select the option of receiving such information or services during the registration. If the user selects such an option and later decides

otherwise, the user should click on the link in our notifications allowing them to cancel such services or contact us using the abovementioned e-mail address.

- With every piece of information sent via e-mail, we give the user a chance to unsubscribe (by canceling their subscription). In order to do so, the user should follow the instructions contained in the e-mail or contact us using the abovementioned e-mail address.

The user may also contact us by writing to the following address: Fundacja Polska Wódka, ul. Złota 59, 00-120 Warsaw.

Moreover, when participating in a program that involves third parties and, in connection with such a program, expressing one's consent to receive the information directly from such third parties in the future, to cancel receiving such information the user should contact those third parties directly. The process may be described in the Privacy Policy of those third parties.

## 9. How do we treat minors?

As the Polish Vodka Museum is dedicated to adults, if the user is a minor then the user is asked not to give us any Personal Data and to leave the Website.

Our Digital Media is not dedicated to minors ("**Minors**"). If Minors give us their Personal Data, then we are collecting such data unaware of such a fact. In order to use the Website (to set up an account, perform other activities and use other services offered by our Digital Media), the user must be at least 18 years old. If we receive reliable information that the Personal Data given to us via Digital Media concerns a Minor, then it shall be immediately deleted.

## 10. Links to other third party websites

Our Digital Media may contain links to other websites or services provided or controlled by third parties. They include the links of advertisers, sponsors and partners using our logotype(s) under the co-branding agreement. Those parties are independent from us, and using their websites and functions is subject to the rules of the privacy policy posted on such websites. We are not liable or responsible for any practices concerning the privacy or business practices of any third parties. In view of the above, the user should be careful and read the respective rules of the privacy policy that apply to any external website the user visits before giving their Personal Data.

## 11. Contact

Should you have any questions, concerns or comments on our Privacy Policy or our data collection practices, contact us by sending an e-mail to: [kontakt@muzeumpolskiejwodki.pl](mailto:kontakt@muzeumpolskiejwodki.pl) or writing to us at the following address: Fundacja Polska Wódka, ul. Złota 59, 00-120 Warsaw.

Last update: [04.08.2017]