

PRIVACY POLICY OF THE ILLION Sp. z o.o. SERVICE

ILLION Sp. z o.o. attaches great importance to the privacy of users of the ILLION Sp. z o.o. service and strives for its full respect.

We make sure that all users know exactly and in detail what data we collect and what privacy protection options are available to them.

In this Privacy Policy, the following terms are used, which mean:

Administrator: ILLION Sp. z o.o., located at ul. Twarda 18, 00-105 Warsaw, registered in the Register of Entrepreneurs in the National Court Register maintained by the District Court in Warsaw, under KRS number: 0000853372, with NIP: 5272934363 and REGON: 386823030, with a fully paid-up share capital of PLN 5,000.00.

Data or personal data

Personal data breach: Data, as defined in Article 4(1) of the GDPR – any information allowing the identification of a natural person, in particular: first name, last name, identification number, location data, internet identifier, or one or more specific factors that define the physical, physiological, genetic, mental, economic, cultural, or social identity of a person;

In accordance with Article 4(12) of the GDPR – a security breach leading to the accidental or unlawful destruction, loss, modification, unauthorized disclosure, or unauthorized access to personal data;

Newsletter: Information sent by electronic mail regarding products and services offered by the Operator, current commercial information, promotions, or other information regarding products, services, and ILLION Sp. z o.o., including news, opinions, contests, events, and other similar content.

Internet Platform or Service: The website operated by the Administrator at <https://illion.pl/>

Privacy Policy: This document.

Processing or processing of personal data: As defined in Article 4(2) of the GDPR – an operation or set of operations performed on personal data or sets of personal data, whether automated or non-automated, such as collecting, recording, organizing, structuring, storing, adapting, modifying, retrieving, viewing, using, disclosing by transmission, dissemination, or other forms of making available, matching, or combining, restricting, erasing, or destroying;

GDPR: Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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).

Administrator's seat: The seat of ILLION Sp. z o.o., ul. Twarda 18, 00-105 Warsaw

User: A natural person using the Internet Platform as a Buyer or entrepreneur within the meaning of the Civil Code, in particular:

- Legal entities, organizational units without legal personality that the law grants legal capacity, as well as natural persons conducting individual business activities.

GENERAL INFORMATION

This Privacy Policy defines the principles for the processing and protection of personal data provided by Users in connection with their use of services through the ILLION Sp. z o.o. Website and other data.

In order to ensure the security of the entrusted data, we have developed internal procedures and recommendations to prevent unauthorized access to personal data. We monitor their implementation and continuously verify their compliance with the applicable legal acts, particularly Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, regarding the protection of natural persons with regard to the processing of personal data and the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation); the Act of May 10, 2018, on the protection of personal data; the Act of July 18, 2002, on providing services by electronic means; and other applicable acts.

DATA ADMINISTRATOR

ILLION Sp. z o.o., located at ul. Twarda 18, 00-105 Warsaw, registered in the Register of Entrepreneurs in the National Court Register maintained by the District Court in Warsaw, under KRS number: 0000853372, with NIP number: 5272934363 and REGON number: 386823030, with a fully paid-up share capital of PLN 5,000.00.

DATA COLLECTION

The Website collects information voluntarily provided by the User, and the data provided in a specific form is processed for the purpose resulting from its function, for example, for User registration or for handling an informational contact request.

Providing personal data is always voluntary, but failure to provide data marked as necessary for providing a given service will prevent its provision. For example, failure to provide the necessary data for User account registration will make it impossible to use the service offered by the Administrator, i.e., the ILLION Sp. z o.o. Website.

In particular, the ILLION Sp. z o.o. service processes the data that you, as the User, provide or leave while using the services of the ILLION Sp. z o.o. website. These are primarily the data necessary and required for registering a User account on our website, which is provided by each User in the registration form. This data is primarily used to provide the service through the ILLION Sp. z o.o. website, fulfill orders, handle complaints and returns, contact the User in case of any inquiries, and perform additional functions in providing our services.

Additionally, we may also process data that you leave while navigating our website and its domain, such as data left in cookies. The specific scope of data we may collect may vary for different individuals or Users, and detailed explanations in this regard are provided in this Privacy Policy or can be requested directly from ILLION Sp. z o.o.

The system performs functions of collecting information about Users and their behavior, including:

- a) through voluntarily entered information in forms, including the registration form;
- b) through the collection of cookies (cookies);
- c) through automatically recording anonymous information related to the User's visit to the website system, i.e., system logs;
- d) through collecting anonymous data regarding the visited websites of the system, i.e., website statistics.

PROCESSING OF PERSONAL DATA

Personal data is processed based on consent voluntarily provided by the User and in cases where the law authorizes the Administrator to process personal data based on legal provisions or for the performance of a contract between the parties.

Personal data left on the Website will not be sold. Data will only be shared with external entities within the limits permitted by law. For example, the Data Administrator may be required to provide information collected by the Website to authorized authorities based on lawful requests, in accordance with the scope specified in a specific request.

The legal grounds for processing personal data by ILLION Sp. z o.o. for specific purposes are as follows:

No | Processing Purposes | Legal Basis | Processing Period

1. a. Performance of the electronic services agreement through the Website between ILLION Sp. z o.o. and the User, including providing electronic services to Users;
b. Resolving complaints
c. Contact with the User;
Article 6(1)(b) GDPR - Necessity for the performance of a contract to which the User is a party
Until the legal existence of the electronic services agreement ends (i.e., until its expiration, termination, cancellation, etc.)
2. Own marketing, related to commercial information, offers, information about ongoing promotions, or other information regarding products and services offered by ILLION Sp. z o.o.;
Article 6(1)(a) GDPR - Voluntary consent
Until consent is withdrawn
3. a. Statistical measurements, including data analysis for system usability purposes
Article 6(1)(a) GDPR - Voluntary consent or
Until consent is withdrawn or functionality, marketing, and marketing of third-party products (if applicable)
b. Pursuing claims or defending against them;
Article 6(1)(f) GDPR - Legitimate interest of the Administrator
Until objection is raised
The implementation of the Newsletter Service, i.e., sending information via email
Article 6(1)(a) GDPR
Until consent is withdrawn, objection is raised, or Newsletter service is discontinued by ILLION Sp. z o.o.
4. Information about products and services offered by ILLION Sp. z o.o., current commercial information, promotions, or other information regarding products, services, and ILLION Sp. z o.o.;
Article 6(1)(f) GDPR - Legitimate interest of the Administrator
Article 6(1)(a) GDPR - Voluntary consent
Until consent is withdrawn, objection is raised, or the service is terminated
5. Handling the Elementor Pro tool, WP forms;
Article 6(1)(f) GDPR - Legitimate interest of the Administrator (in case of direct marketing)
Until objection is raised or Newsletter service is discontinued by ILLION Sp. z o.o.
Article 6(1)(a) GDPR
Until consent is withdrawn
6. Managing websites, social media portals, and their administration, e.g., Facebook, Instagram, YouTube, TikTok;
Article 6(1)(f) GDPR - Legitimate interest of the Administrator through the selection of the "Follow" option, as well as by interacting (liking posts, commenting, etc.);
Until objection is raised or the management of social media portals by the Administrator ceases.

Detailed information regarding the User's data, including personal data and its protection, is also specified in the Terms and Conditions of the ILLION Sp. z o.o. Service, in the section titled "User Data and Its Protection."

TRANSFER OF PERSONAL DATA

Personal data may be transferred to other entities referred to as data processors. The transfer of data involves entrusting it to entities on behalf of the Administrator, to the extent that the Administrator does not process it themselves.

The processing of personal data may be entrusted to entities such as IT service providers, telecommunications service providers, or marketing agencies.

Data processors process the data solely based on an agreement with the Administrator, in accordance with the Administrator's instructions and guidelines.

Personal data may also be entrusted to any entities authorized to obtain it based on applicable legal provisions, including, in particular, law enforcement authorities in the case of a request by such an authority, supported by an appropriate legal basis, for example, as part of an ongoing criminal investigation by these authorities.

DATA PROCESSORS OUTSIDE THE EUROPEAN ECONOMIC AREA

Due to the use of external tools by the Administrator such as:

- WPForms – WPForms, LLC.
- Elementor Pro
- Google – Google LLC, 901 Cherry Ave. San Bruno, CA 94066, USA
- Meta – Meta Platforms, Inc. 1 Meta Way Menlo Park California 94025
- Usercentrics – usercentrics.eu

User personal data may be transferred outside the European Economic Area, particularly to the United States.

These entities, in their documents, including terms of service and privacy policies, ensure that they maintain a level of security for processing personal data in accordance with EU standards, including through the use of standard contractual clauses (SCCs) adopted by the European Commission.

The Administrator will make every effort to verify its contractors to ensure the secure transfer of personal data in compliance with GDPR requirements.

REGISTRATION ON THE ILLION Sp. z o.o. PLATFORM

To create an account on the website <https://illion.pl/>, each natural person is required to provide the necessary personal data to enable registration and management of the individual User account.

Among the necessary personal data mentioned above, at least an email address is required, as well as other data required for account creation in accordance with the Platform's Terms and Conditions. Failure to provide such data will result in the inability to create a User account. Providing additional data is voluntary. The User may not place any data of third parties on the Website without their explicit and voluntary consent.

The Administrator's services are not directed to individuals under the age of 13. If it is discovered that, despite a clear prohibition, an individual not meeting the age requirement has provided their personal data to the Administrator, this data will be promptly deleted.

MARKETING

The Administrator allows for the processing of the User's personal data for marketing purposes, which include, in particular:

- Displaying online advertisements tailored to the individual User, based on previously viewed content or preferences;
- Sending marketing messages regarding the Administrator's services via email.

Additionally, in some cases, the Administrator uses profiling, i.e., the general collection of data about the User, based on which specific conclusions about the individual entity are drawn.

FACEBOOK LEAD ADS

For marketing purposes and to expand its audience, the Administrator may use the external advertising system **Facebook Lead Ads**. This involves the processing of personal data. The type of personal data collected is related to the specific content of the ad being presented. When filling out the **Facebook Lead Ads** form, the User may be asked to provide personal data such as: name, phone number, email address, date of birth, and place of residence.

The Administrator processes personal data through the **Facebook Lead Ads** service for marketing purposes related to the services offered and to establish contact with the interested User.

Providing personal data in the **Facebook Lead Ads** form is voluntary and entirely at the User's discretion. Personal data will be processed based on the User's consent (Article 6(1)(a) GDPR). The User can withdraw their consent at any time without providing a reason.

The remaining provisions of this Privacy Policy of ILLION Sp. z o.o. apply accordingly to the **Facebook Lead Ads** service and the associated processing of personal data.

Usercentrics

Cookiebot by Usercentrics is a consent management platform that ensures compliance with current regulations.

<https://www.cookiebot.com/>

NEWSLETTER

If the User wishes to use the **Newsletter** service provided by ILLION Sp. z o.o., it is indicated that the User's personal data will be processed for the purpose of providing the **Newsletter** service, i.e., sending information via email about the products and services offered by ILLION Sp. z o.o., current commercial information, promotions, or other information about products and ILLION Sp. z o.o. itself.

We begin processing the User's personal data from the moment they give conscious and voluntary consent to the Administrator for the provision of the **Newsletter** service.

ILLION Sp. z o.o. will process the User's personal data until the User objects, unless the processing purpose ends earlier (i.e., ILLION Sp. z o.o. discontinues the **Newsletter** service).

For the provision of the **Newsletter** service, ILLION Sp. z o.o. uses tools such as Elementor Pro and WPForms.

The remaining provisions of this Privacy Policy of ILLION Sp. z o.o. apply accordingly to the **Newsletter** service and the associated processing of personal data.

SOCIAL MEDIA PLATFORMS

In connection with managing social media platforms, the Administrator processes the following personal data: primarily the name and surname, but also other data voluntarily provided by the social media user on their profile.

This data is processed to manage ILLION Sp. z o.o.'s social media profile, as well as to contact and exchange correspondence with other social media users. Personal data will be processed, in particular, when interacting with ILLION Sp. z o.o.'s profile, e.g., by following the profile, liking posts, adding comments, sharing posts, and in the context of "contact advertising" (Facebook Lead Ads).

The Administrator informs that their website <https://illion.pl/> includes plugins that link to the relevant social media profiles. Clicking on an icon with the logo of a given social media profile immediately redirects to ILLION Sp. z o.o.'s profile on one of the platforms listed below.

The Administrator uses the following social media platforms:

- **YouTube** – <https://www.youtube.com/@illionroto>
- **LinkedIn** – <https://www.linkedin.com/company/illion-roto-production-house/>

Personal data of individuals visiting ILLION Sp. z o.o.'s social media platforms will be processed for the duration of these platforms' operation, based on voluntary consent, expressed by selecting the "Follow" option or interacting with posts (liking, commenting, etc.).

Personal data processing may also occur based on the legitimate interest of the Administrator, such as for marketing purposes.

The remaining provisions of this Privacy Policy of ILLION Sp. z o.o. apply accordingly to the processing of personal data related to the use of social media platforms.

ANALYTICAL AND MARKETING TOOLS

The Administrator uses the following analytical and marketing tools:

- **Google Ads**
- **Google Analytics**
- **Google Search Console**

RIGHTS OF DATA SUBJECTS

Every individual whose data is processed by us, including in particular the data required for User account registration on the ILLION Sp. z o.o. Website, has the right to manage their personal data. Therefore, every data subject has a range of rights regarding the processing of their personal data by ILLION Sp. z o.o. The scope of these rights depends on whether the specific data is processed for the performance of a contract under which we provide services through the Website or for other additional purposes for which consent for processing was given.

Each data subject has the following rights:

- The right to obtain all information about the personal data used, as well as the rights related to the transfer of personal data;
- The right of access to personal data;
- The right to request rectification of inaccurate personal data;
- The right to request the completion of incomplete personal data;
- The right to request the deletion of personal data, provided that this right applies in strictly defined situations, specified in Article 17 of the GDPR;
- The right to request the restriction of personal data processing, which applies in strictly

- defined situations specified in Article 18 of the GDPR;
- The right to receive personal data in a commonly used, machine-readable format, e.g., a copy of this data;
- The right to transfer the received personal data to another Administrator without any hindrance from the Administrator;
- The right to object to processing at any time, which applies in strictly defined cases specified in Article 21 of the GDPR;
- The right to file a complaint with the supervisory authority for data protection, which in Poland is the President of the Personal Data Protection Office;
- The right to withdraw consent to the processing of personal data at any time, but this right only applies to processing carried out on the basis of separate consent.

It should be noted that the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. This means that ILLION Sp. z o.o. will no longer be able to process personal data from the moment consent is withdrawn.

To exercise the above rights, please contact the Administrator or the Data Protection Officer, if appointed.

COOKIES

The ILLION Sp. z o.o. Website, specifically its webpage, uses so-called cookies, which identify the browser, primarily for creating statistics that help understand how Users interact with the website. This enables the improvement of the website's structure and content, as well as optimizing the system's operation.

The entity placing cookies on the User's device and gaining access to them is the operator of the Service domain or entities cooperating with it.

The software used for browsing websites (web browser) typically allows cookies to be stored on the User's device by default. It is possible to choose the option to block cookies or to be notified each time cookies are placed on the device by selecting the appropriate setting in the browser being used. However, blocking cookies may prevent some features from functioning correctly.

Cookies typically contain the domain name of the website from which they come, the duration of their storage on the User's device, and a unique number. Importantly, cookies are not used to identify the User, and based on them, the User's identity is not determined. Therefore, these cookies do not contain any personal data.

The system's domain uses cookies and other similar technologies to provide the services offered by the operator, as well as to customize the content according to the preferences of the specific User and optimize the use of the website. In particular, this allows the recognition of the User's device and enables the appropriate display of the website tailored to the individual needs and preferences of the User.

Thanks to cookies, it is also possible to maintain the User's session after they log in, so the User does not have to re-enter their login and password on every page.

Cookies also allow the creation of statistics, which, after analysis, help to understand how Users interact with the Service domain, enabling the Service and its domain to be continuously improved in terms of structure and content.

The following types of cookies are used:

- **Required Cookies:** This type of cookie is essential for the proper functioning of the website. These cookies help verify any errors in the website's operation and manage the active session,

such as saving the contents of the shopping cart. This type of cookie does not store any personal data, and thus does not require consent and is always active.

- **Analytical Cookies:** Analytical cookies allow the collection of information about the number of visits to the site, User behavior, and statistics on the use of the website, helping us improve our services.
- **Social Media Cookies:** This type of cookie helps us understand which content is being viewed on our website. With this knowledge, we can tailor our services to meet the User's needs. Social media cookies help us gather and store data in order to deliver services according to the User's previous choices.
- **Marketing Cookies:** Marketing cookies allow for the display of personalized ads that are tailored to the User's previous choices. Not consenting to these cookies does not affect the ability to use the website.

SYSTEM LOGS

The servers of the ILLION Sp. z o.o. Website automatically record so-called system logs during the User's browsing of the Website and their use of the services. These logs consist of anonymous information such as the browser address, IP address, URL address, time spent browsing, or using the website, etc. The automatically saved logs serve as auxiliary material for administering the Website and collecting information about all actions performed by a specific User on the website.

The analysis of the above-mentioned actions helps to enhance the security of Users related to the functioning of the system.

The information contained in the collected system logs is stored indefinitely and is disclosed solely to individuals administering the server and entities responsible for the technical and IT support of the Website.

WEBSITE STATISTICS

Data is also collected regarding the visited webpages, specifically regarding the number of visits, the country of the visitor, the time spent browsing or using the Website. These data are subject to appropriate analysis, which forms the basis for future marketing actions of ILLION Sp. z o.o. The collection of data in the aforementioned manner is based on the use of so-called cookies; however, it is not possible to share data that would allow the identification of the User.

DATA SECURITY

The Administrator takes all necessary actions to ensure the proper protection of personal data. In this regard, the Administrator maintains:

- A register of processing activities;
- A register of categories of processing activities;
- A register of personal data breaches.

The Administrator has also prepared a report assessing the impact on personal data protection.

CHANGES TO THE PRIVACY POLICY

ILLION Sp. z o.o. reserves the right to modify the above privacy policy by publishing a new version of the privacy policy on the ILLION Sp. z o.o. Website or by publishing the current privacy policy with the introduced changes on the aforementioned system. Changes may be prompted, in particular, by the development of internet technology, potential changes in the applicable laws regarding the protection of personal data, and the development of our Website.

CONTACT

In case of any doubts regarding any of the provisions of this privacy policy, the Service team is available to assist Users. Contact details can be found on the website under the "Contact" tab.