

Privacy Policy – customers

Company Panecillo Fresco, S.L., Velazquez 64, 4º izq, 28006 Madrid, ID: B16881195 (also referred to as “we/our”), as a data controller, informs you, the users of the www.sezamo.es (“website”), about the collection of personal data and privacy protection described below:

In the following text you will namely find out:

1. Which of your personal data will be processed;
2. For what purpose and by what means we will process your personal data;
3. To whom your personal data may be transferred;
4. For how long we will process your personal data;
5. What your rights are in relation to the protection of your personal data.

Please feel free to contact us at our e-mail address privacy@rohlikgroup.com at any time if you need any explanation or advice regarding any part of the text or if you want to discuss further processing of your data.

1. Scope of data processing

1.1. When you contact us via our website, you may be asked to provide us with certain data about yourself or your company. The data may be namely the following:

- a. Your name and surname,
- b. Address,
- c. Registered company name,
- d. Registered office of the company,
- e. ID No. and Tax ID No.,
- f. Phone number, and
- g. E-mail address.

We use the data to get back to you and provide the information you have asked for.

1.2. If you purchase goods on our website, we need the following data from you to conclude and perform a contract:

- a. Your name and surname,
- b. Your delivery address,
- c. Phone number,
- d. E-mail address.

Personal data are processed for the purpose of performing a contract.

If you make a purchase with us, we will save the information you have entered (primarily your name and surname, delivery address, phone number, e-mail address) for use in your next purchase so that you do not have to enter it again. We will also store your purchases in a "My Favourite Items" list to make it easier for you to find these products at one spot on the website or your mobile app the next time you make a purchase. If you want to access your order history under your e-mail, you can set up a password for it.

If you **create a customer account** protected by a password on our website or use our default customer account, we also process the data you provide about yourself through your account, including your purchase history with us, for the purposes of managing your customer account, creating a list of favourite items for your next purchase and sending you offers of our products.

You can also **access** your customer account **via Facebook**, in which case you will not have to enter your data manually; instead, we will obtain your data necessary to duly create your customer account (namely name and surname, e-mail address) from Facebook.

If you buy our goods from us, we can also use your name, surname, e-mail address and phone number to send you marketing communications to inform you, **via electronic means (e-mail, text messaging)**, about goods or services that we provide and which we think may be of interest to you according to the category of goods that you have purchased from us. You can opt out from receiving marketing communications sent by electronic means at any time by using the link in the e-mails or by sending a message to privacy@rohlikgroup.com.

We may also send/provide you with our offers, information about news and discounts or other marketing communications:

- o **by post**, in which case we will process your name, surname and address for these purposes;
- o **by phone** (live conversation), in which case we will process your name, surname and phone number for these purposes.

Please notify us in writing should you not wish to receive marketing communications from us by phone or by post.

If you fill a customer satisfaction questionnaire after you make a purchase, we will file it with the data on your order and we will process the data you provide in the questionnaire to enhance the quality of our services. The completion of the questionnaire is voluntary.

The provision of data for the purpose of performance of the contract and the provision of data to allow us to respond to your questions and provide you with requested information is our prerequisite for concluding a contract; if you fail to provide the data, the contract may, as a result, not be concluded, or your questions may be left unanswered.

1.3. If you give us your consent on our website, we will also process the data you provide, including your purchase history, for the following purposes:

- o conducting marketing analyses and statistics, including profiling;
- o sending marketing communications regarding our goods and services and of our partners to your e-mail address, taking into account your purchases, preferences or otherwise tailored to select the goods and services best suited to your needs;
- o using personal data transferred to us by the social network Facebook, if you log in through this social network, to the extent of your settings, for the above purposes.

Provision of such consent is voluntary and you are not obliged, under any legal regulation, to give your consent. You may withdraw your consent at any time without prejudice to the processing of your data prior to its withdrawal.

2. Who has access to your personal data

Your personal data will be processed by us as the controller. The data controller Panecillo Fresco, S.L., is part of a group of companies led by the company Rohlik Group a.s. with its registered office at Sokolovská 100/94, Karlín, 186 00 Prague 8, Czech Republic. Personal data sharing for internal administrative and operational purposes between [Rohlik Group a.s.](#) group of companies all based in the EU takes place on the legal basis of Article 6 (1) (f) GDPR, i.e., legitimate interest, in compliance with Recital 48 GDPR.

We may transfer your personal data to our subcontractors to carry out the processing for us for the above purposes. Personal data may be transferred to:

- o an external accounting firm;
- o an external law firm;
- o processors who provide server, web, cloud or IT services to us or who are our business partners.

3. Duration of personal data processing

3.1. We will process your personal data for the period we provide you with our services or perform a mutual contract or for the period necessary to comply with archiving obligations under applicable laws, such as the Accounting Act, the Archives and Records Act, or the Value Added Tax Act.

3.2. After the performance of the contract (payment of the price and delivery of the goods), we continue to process your personal data for our legitimate interests, which are the protection of our claims, for the necessary period, but no longer than 4 years.

3.3. We will process personal data relating to your customer account, including the data contained therein, for the purpose of managing your customer account and for the purpose of sending you offers for our goods until you cancel your account. However, if you set up a customer account (or log in to it via Facebook) and do not make any purchase with us, we will process the data for a period of 5 months after setting up such an account. We will retain the data about your purchases in your customer account for a period of 4 years and after expiry of that period we will delete them except where:

- o you have purchased from us in the last 6 months; or
- o you have logged into your customer account in the last 12 months; or
- o you have granted us your consent under points 1.3.

3.4. We will process the personal data that we process on the basis of your consent under points 1.3 and until you withdraw your consent. To withdraw your consent, please **send an e-mail with the relevant request to privacy@rohlikgroup.com**.

3.5. In addition, you can refuse the processing of your personal data for the purpose of sending marketing communications at any time while this will not affect our other relations. You can simply refuse the sending of such communications by clicking on the link provided in the marketing communication sent, or you can send us an e-mail with the relevant request to privacy@rohlikgroup.com.

4. Cookies and social networks

4.1. Cookies are small text files containing short data that can be stored on the user's device when visiting a website. We use cookies on our website for the following purposes:

- o remembering the logged-in user;
- o carrying out adding to the basket and ordering;
- o convenient web features;
- o anonymised evaluation of users' movements on the website;
- o customer chat;
- o obtaining voluntary feedback from users; and
- o ads serving personalisation.

4.2. We use the following marketing tools on our website:

- o Google Analytics advertising features beyond the basic analytical features (for more details, click [HERE](#));
- o Additional Hotjar services that can process information on the user as part of optimisation (for more details click [HERE](#));
- o Adform – a tool that uses cookies to display advertising relevant for the user, to enhance the campaign performance overviews or to prevent users from seeing the same advertising multiple times (for more details, click [HERE](#));
- o Marketing services provided by Facebook that enable an advertisement to be displayed to Website users visiting Facebook or other websites that also use these tools (for more details, click [HERE](#));

All personal data are processed in a lawful and transparent manner and only adequate, relevant and necessary data are requested in relation to the purposes of the processing.

4.3. You can reject cookies in the settings of your internet browser, or you can set the use of only some of them. You can find how to set cookies in the most frequently used browsers at the following links:

- o [Chrome](#)
- o [Firefox](#)
- o [Internet Explorer](#)
- o [Opera](#)
- o [Microsoft Edge](#)

4.4. The social network buttons are placed on our website mainly for the possibility of interacting with social networks in order to make the website more interesting for you as a user. Connection to the respective social network will only take place if you actively click on the relevant button. In this case, your web browser will start connecting to the servers of the relevant social network.

5. Your rights arising from the processing of personal data

As a data subject, you have certain rights in connection with the processing of personal data, which result from applicable laws and which you may exercise at any time. These rights include

- (i) the right of access to personal data,
- (ii) the right to rectification of inaccurate personal data and to completion of incomplete personal data,
- (iii) the right to erasure of personal data if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, or if it is established that the personal data have been unlawfully processed,
- (iv) the right to restriction of processing,
- (v) the right to data portability,
- (vi) the right to object to processing of personal data whereupon the processing will be discontinued, unless compelling legitimate grounds for the processing demonstrably exist which override the interests, rights and freedoms of the data subject, in particular where such grounds include the exercise of legal claims, and
- (vii) the right to turn to the data protection authority.

Right of access to personal data: If you wish to know whether we are processing your personal data, you have the right to obtain information as to whether or not your personal data are being processed and, where that is the case, you also have the right to obtain access to your personal data.

Right to rectification of inaccurate personal data and to completion of incomplete personal data: If you think that we are processing personal data about you which are inaccurate or incomplete, you have the right to request their rectification and/or completion. We will rectify or complete the data without undue delay, taking into account technological capacities.

Right to erasure: If you request erasure, we will erase your personal data if (i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, (ii) the personal data have been unlawfully processed, (iii) you object to the processing and there are no overriding legitimate grounds for the processing of your personal data, or (iv) the legal obligation in EU or national law to process personal data no longer applies.

Right to restriction of processing: If you request restriction of processing, we will make your personal data unavailable, or will temporarily remove or store them, or will perform any other processing activities as may be necessary for the proper exercise of that right;

Right to data portability: If you wish us to transfer to a third party the personal data we are processing about you electronically on the basis of a contract or your consent, you may exercise your right to data portability. In the event the exercise of this right adversely affects the rights and freedoms of others, we will not be able to act on your request.

Right to object: The right to object to the processing of personal data for the performance of a task carried out in the public interest or in the exercise of official authority, or for protection of legitimate

interests. Unless we can demonstrate that compelling legitimate grounds for the processing exist which override the interests, rights and freedoms of the data subject, the processing will be discontinued without undue delay.

Where requests to exercise the above rights are repetitive or manifestly unfounded, we may either charge a reasonable fee for the exercise of the relevant right or refuse to act on the request. If this is the case, you will be informed accordingly.

You can exercise all your rights by contacting us at the e-mail address privacy@rohlikgroup.com.

You can lodge a complaint with the supervisory authority, which is Agencia Española de Protección de Datos, <https://www.aepd.es>.

This Data Processing Policy is in effect as of 1 January 2022 and is updated on a regular basis.