

Privacy policy

Hello!

Since you are here, it means that you value your privacy. We understand it perfectly, that is why we provide you with a document in which you will find in one place the rules for the processing of personal data and the use of cookies and other tracking technologies in connection with the functioning of the online shop <https://www.shop.roribox.com>.

This privacy policy is structured in the form of questions and answers. The choice of this form was dictated by the care for transparency and legibility of the information presented to you. Below you will find the table of contents of this policy corresponding to the questions we answer one by one.

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In case of any doubts related to the privacy policy, you can contact us at any time by sending a message to the following address: roribox@roribox.com.

1: Who is the controller of your personal data?

The controller of your personal data is Cieszyńskie Zakłady Kartoniarskie S.A., ul. Frysztacka 23, 43-400 Cieszyn, NIP [Taxpayer Identification Number]: 5480075962.

2: Who can you contact regarding the processing of your personal data?

As part of the implementation of personal data protection in our organisation, we have decided not to appoint a personal data protection officer due to the fact that in our case it is not mandatory. In matters related to the protection of personal data and broadly understood privacy, you can contact us at roribox@roribox.com.

3: What information do we have about you?

Depending on the purpose, we may process the following information about you:

- name and surname,

- address of residence
- business address,
- Taxpayer Identification Number (NIP)
- e-mail address,
- telephone number,
- data contained in a correspondence addressed to us,
- bank account number,
- IP address,
- image (profile photo),
- the products you viewed in the shop,
- details of orders placed,
- details of abandoned carts,
- information about the operating system and web browser you use,
- viewed subpages,
- time spent on the website,
- transitions between individual subpages,
- clicks on individual links,
- a source from which you go to our website,
- your age range,
- your gender,
- your approximate location limited to the city,
- your interests based on your online activity.

We have described precisely the scope of the processed data in relation to each processing purpose. Respective information can be found further in this policy.

#4: Where do we get your personal data from?

In most cases, you provide us with such data yourself. This happens when:

- you register a user account,
- you place an order in the shop,
- you submit a complaint or withdraw from the contract,
- you subscribe to the newsletter,
- you contact us.

In addition, some information about you may be automatically collected by the tools we use:

- the shop mechanism collects information about the products you have viewed, details of orders placed, including unfinished ones,
- Google Analytics collects a lot of information about how you use our shop.

#5: Is your data safe?

We care about the security of your personal data. We have analysed the risks associated with individual data processing, and we have implemented appropriate security and personal data protection measures. We monitor the condition of our technical infrastructure on an ongoing basis, train our staff, observe the procedures applied and introduce necessary improvements. If you have any questions regarding your personal data, you can contact us at roribox@roribox.com.

#6: For what purposes do we process your personal data?

There is more than one purpose. Below you will find a list of them followed by a more detailed description. We have also assigned the appropriate legal grounds for processing to the individual purposes.

- registration and maintenance of a user account - article 6 (1)(b) GDPR,
- order handling - article 6 (1)(b) GDPR,
- handling complaints or withdrawal from the contract - article 6 (1)(f) GDPR,
- handling correspondence - article 6 (1)(f) GDPR,
- fulfilment of tax and accounting obligations - article 6 (1)(c) GDPR,
- creating archive records for the purposes of defending, establishing or pursuing claims, if any, as well as to identify a returning customer - article 6 (1)(f) GDPR,

- own marketing - article 6 (1)(f) GDPR,
- analysis, statistics and optimisation - article 6 (1)(f) GDPR.

User account - details

When creating a user account, you must provide the data necessary to set up an account: an e-mail address and a password. Providing data is voluntary, but necessary to create an account.

As part of editing your account data, you can provide your further data, in particular data that may be used when placing orders, such as name and surname, address of residence or place of business, tax identification number, telephone number.

In addition, our system used to operate user accounts records your IP number that you used when registering your user account.

Moreover, we use the integration of Google Analytics tool with the user account mechanism. In this way, the data collected by the Google Analytics tracking code about your use of our shop is assigned to your user account. This includes information such as:

- information about the operating system and web browser you use,
- viewed subpages,
- time spent on the website,
- transitions between individual subpages,
- clicks on individual links,
- the source from which you go to our website,
- your age range,
- your gender,
- your approximate location limited to the city,
- your interests based on your online activity.

We analyse such information about you in order to optimise our websites in terms of user experience, effectiveness and conversion, which is our legitimate interest as referred to in article 6 (1)(f) GDPR.

You can modify the information about you provided to us in connection with the registration of your user account at any time.

The data provided by you in connection with the creation of an account is processed in order to provide you with an electronic service consisting in providing you with the possibility of using the user account. This service is provided on the basis of an agreement concluded on the terms described in the regulations, which means that in this respect the legal basis for the processing of your personal data is article 6 (1)(b) GDPR.

The data will be stored for the period of functioning of the user account. You can decide to delete your account at any time, but it will not delete information about your orders placed using the account from our database. Order details are stored in our archive throughout the period of operation of the shop to ensure the possibility of identifying the returning customer, recreating his purchase history, granted discounts, etc., which is our legitimate interest referred to in article 6 (1)(f) GDPR.

Orders - details

When placing an order in the shop, you must provide the data necessary to execute the order. Depending on the order details, the data may be different. For example, if you order physical products, we need to know the address to which to deliver the order. If you request a VAT invoice for a company, we need to know the taxpayer identification number and the business address. Providing data is voluntary, but necessary to place an order.

Moreover, our system used to handle the ordering process records your IP number that you used when placing the order.

Each order is saved in our database, which means that your personal data assigned to the order is also accompanied by information about the order, such as ordered products, selected payment method, selected delivery method, payment date.

The data collected in connection with the order are processed to perform the contract concluded by placing an order (Article 6 (1)(b) GDPR), to issue an invoice (Article 6 (1)(c) GDPR in connection with the provisions governing the issuance of invoices), entering the invoice in the accounting documentation and fulfilling other tax and accounting obligations (Article 6 (1)(c) GDPR in connection with the provisions governing tax and accounting obligations) and for archival purposes to defend, establish or pursue claims, if any, as well as to identify a returning customer, which is our legitimate interest (Article 6 (1)(f) GDPR).

Order details will be processed for the time necessary to execute the order, and then until the expiration of the limitation period for claims under the contract. In addition, after the expiration of that period, the data may still be processed by us for archival purposes to defend, establish or pursue claims, if any, as well as to identify the returning customer. Please remember that we are obliged to keep accounting records, which may contain your personal data, for the period required by law.

Handling correspondence - details

By contacting us, you naturally provide us with your personal data contained in the correspondence, in particular your e-mail address, name and surname. Providing data is voluntary, but necessary to make contact.

In this case, your data is processed in order to contact you, and the basis for processing is article 6 (1)(f) GDPR, i.e. our legitimate interest. The legal basis for processing after finalisation of the contact is also our justified purpose being archiving correspondence for the purpose of ensuring the possibility of proving certain facts in the future (Article 6 (1)(f) GDPR).

The content of the correspondence may be archived and we are not able to clearly determine when it will be deleted. You have the right to request presentation of a history of correspondence with us (if it was archived), as well as request its removal, unless its archiving is justified by our overriding interests, e.g. protection against your potential claims.

Tax and accounting obligations - details

If we issue an invoice to you, it is included in the accounting documentation, which will be kept for the period of time required by law. In such a situation, your personal data is processed in order to fulfil our tax and accounting obligations (Article 6 (1)(c) GDPR in connection with the provisions governing tax and accounting obligations).

Archive - details

In the description of individual purposes of personal data processing which are listed above, we have indicated the time-limits for personal data storage. These time-limits are often related to the archiving of certain data by us for the purposes of ensuring the possibility of proving certain facts in the future, reconstructing the course of cooperation with the customer, exchanging correspondence, defence, establishing or pursuing claims. In this regard, we rely on our legitimate interest referred to in article 6 (1)(f) GDPR.

Own marketing - details

In our shop, we use an abandoned cart recovery mechanism. In a situation where you start the ordering process but do not complete it, our system will record this fact in order to take action to persuade you to finalise the order. These activities may include, in particular, sending you an email encouraging you to complete your order or displaying a targeted advertisement while browsing the Internet.

We carry out the activities described above based on our legitimate interest referred to in article 6 (1)(f) GDPR consisting in the marketing of own products.

Analysis, statistics, optimisation - details

We collect statistical information on behaviour of users browsing our websites, such as clicks on links, transitions between subpages, time spent on individual pages, etc. We analyse this information in order to optimise our pages in terms of user experience, effectiveness and conversion. In most cases, the information processed in this way is not personal data. An exception is the situation when you are a registered user. In such case we can combine this information with your other data collected in your user account.

We carry out the activities described above based on our legitimate interest referred to in article 6 (1)(f) GDPR consisting in the optimisation of our websites.

7: For how long will we keep your personal data?

The data storage periods have been indicated separately for each purpose of processing. You can find this information under the details for each separate processing purpose.

8: Who are the recipients of your personal data?

We can risk saying that modern business is not complete without services provided by third parties. We also use such services. Some of these services involve the processing of your personal data. External service providers who are involved in the processing of your personal data include:

- a hosting provider that stores data on the server,
- a provider of the invoicing system in which your data is stored for the purpose of invoicing,
- courier companies that process your data to the extent necessary to deliver your order,
- a law firm that gains access to data if it is necessary to provide legal assistance to us,
- an entity providing maintenance services that gains access to data, if the technical works carried out relate to areas where personal data is located,
- other subcontractors who gain access to data, if the scope of their activities requires such access.

Your personal data may also be transferred to tax offices to the extent necessary to fulfil tax, settlement and accounting obligations. It concerns in particular all declarations, reports, statements and other accounting documents in which your personal data is included.

In addition, if necessary, your personal data may be made available to entities, authorities or institutions authorised to obtain access to data on the basis of legal provisions, such as the police, security services, courts, public prosecutor's offices.

Moreover, we use tools that collect a lot of information about you related to the use of our shop. It includes, in particular, the following information:

- information about the operating system and web browser you use,
- viewed subpages,
- time spent on the website,
- transitions between individual subpages,
- clicks on individual links,
- the source from which you go to our website,
- your age range,
- your gender,
- your approximate location limited to the city,
- your interests based on your online activity.

This information as such is not, in our opinion, personal data. Since this information is collected by external tools that we use, it is also processed by the providers of the tools on the terms resulting from their regulations and privacy policies. Basically, this information is used to provide and improve services, manage them, develop new services, measure the effectiveness of advertisements, protect against fraud and abuse, as well as to personalise the content and advertisements displayed on individual websites, sites and applications. We have provided respective details further in this policy, as part of the explanations related to individual tools.

#9: Do we transfer your data to third countries or international organisations?

Yes, some of the processing of your personal data may involve its transfer to third countries.

We transfer your personal data to third countries in connection with the use of tools that store personal data on servers located in third countries, in particular in the USA. The providers of these tools guarantee an adequate level of personal data protection through the appropriate compliance mechanisms provided for by the GDPR, in particular by joining the Privacy Shield program or applying standard contractual clauses.

Personal data is stored on servers located in third countries using the following tools:

- Google services within the G Suite package provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland - in respect of all data that is processed as part of Google services, including data contained in files synchronised with Google Drive.

Google Ireland Limited ensures an adequate level of personal data protection through the use of compliance mechanisms provided for by the GDPR, in particular by joining the Privacy Shield program. Below you can find links to confirmations of participation in the Privacy Shield program, where you can read information on the processing of personal data by these entities.

- Google: <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI>,

Please remember that we use external tools that may collect anonymous information about you. We have already mentioned it in this policy, including in the response to the previous question. The providers of these tools often use servers located worldwide, in particular in the United States of America (USA), to store the collected information.

#10: Do we use profiling? Do we make automated decisions based on your personal data?

We do not make decisions in relation to you based solely on automated processing, including profiling, that would have legal effects on you or similarly significantly affect you.

Although we use tools that can take specific actions depending on the information collected as part of the tracking mechanisms, we believe that these actions do not have a significant impact on you, because they do not differentiate your situation as a customer, they do not affect the terms of the contract you can conclude with us, etc.

By using certain tools, we can, for example, direct personalised ads to you based on your previous actions taken on our website or suggest products that may be of interest to you. This is a so-called behavioural advertising. We encourage you to learn more about behavioural advertising, in particular in terms of privacy issues. Detailed information, including the possibility to manage your behavioural advertising settings, can be found here: <http://www.youronlinechoices.com>.

We emphasise that in the tools we use, we do not have access to information that would allow your identification. The information we are talking about include, in particular:

- information about the operating system and web browser you use,
- viewed subpages,
- time spent on the website,
- transitions between individual subpages,
- the source from which you go to our website,
- your age range,
- your gender,
- your approximate location limited to the city,
- your interests based on your online activity.

We do not match the information indicated above with your personal data, which is in our databases. This information is anonymous and does not allow us to identify you. This information is stored on the servers of the providers of individual tools, and these servers are most often located worldwide.

An exception to the anonymous nature of the information referred to above is the situation in which you have a user account in our shop. In such case the information can be matched with your data stored in your user account. However, we still do not make decisions in relation to you with the use of this information, based on automated processing, including profiling, which would have legal effects on you or similarly significantly affect you. We believe that activities in the field of targeting ads to you, depending on your activity in our shop and taking optimisation measures, do not significantly affect you. Therefore in this regard, we rely on our legitimate interest referred to in article 6 (1)(f) GDPR.

#11: What rights do you have in relation to the processing of your personal data?

GDPR grants you the following potential rights related to the processing of your personal data:

- right to access your data and receive copies of such data,
- right to rectify (correct) your data,
- right to delete the data (if in your opinion there are no grounds for us to process your data, you can request that we delete it),
- the right to restrict data processing (you can request that we restrict the processing of data only to its storage or performance of actions agreed with you, if, in your opinion, we have incorrect data or we process it groundlessly),
- the right to object to the processing of data (you have the right to object to the processing of data on the basis of a legitimate interest; you should indicate a specific situation that, in your opinion, justifies the cessation of the processing covered by the objection; we will stop processing your data for these purposes, unless we prove that the grounds for data processing by us override your rights or that your data is necessary for us to establish, pursue or defend claims),
- the right to data portability (you have the right to receive from us, in a structured, commonly used, machine-readable format, the personal data that you provided to us on the basis of a contract or your consent; you can order us to send this data directly to another entity),
- the right to withdraw consent to the processing of personal data, if you previously gave such consent,
- the right to lodge a complaint with the supervisory authority (if you find that we are processing data unlawfully, you can file a complaint with the President of the Office for Personal Data Protection or another competent supervisory authority).

The rules related to the exercise of the above-mentioned rights are described in detail in articles 16 - 21 GDPR. We encourage you to familiarise yourself with these regulations. We believe it is necessary to explain to you that the abovementioned rights are not absolute and you will not have such rights in relation to all processing of your personal data.

We emphasise that you always have one of the rights indicated above - if you believe that we have breached the provisions on the protection of personal data while processing your personal data, you have the option to lodge a complaint with the supervisory authority (the President of the Office for Personal Data Protection).

You can always ask us to provide you with information about what data we have about you and for what purposes we process it. Just send a message to roribox@roribox.com. However, we have made every effort to ensure that the information you are interested in is comprehensively presented in this privacy policy. You can also use the e-mail address provided above if you have any questions related to the processing of your personal data.

#12: Do we use cookies and what are they exactly?

Our shop, like almost all other websites, uses cookies.

Cookies are small text information stored on your terminal equipment (e.g. computer, tablet, smartphone), which can be read by our ICT system (first-party cookies) or ICT systems of third parties (third-party cookies). In cookies, specific information can be saved and stored, which can then be accessed by IT systems for specific purposes.

Some of the cookies we use are deleted after the end of the browser session, i.e. after closing it (so-called session cookies). Other cookies are stored on your terminal equipment and allow us to recognise your browser the next time you visit the website (persistent cookies).

If you want to learn more about cookies, you can check, for example, this material: https://pl.wikipedia.org/wiki/HTTP_cookie.

#13: On what basis do we use cookies?

We use cookies on the basis of your consent, except when cookies are necessary for the proper provision of electronic services to you.

As far as your consent to cookies is concerned, we accept the option according to which you express such consent through the settings of your web browser or additional software supporting the management of cookies. We assume that you agree to all cookies used by us that are not blocked by your browser or any additional software you use.

Please remember that disabling or limiting the use of cookies may prevent you from using some of the functions available in our shop and cause difficulties in using our shop, as well as many other websites that use cookies. For example, if you block cookies of social media plug-ins, then buttons, widgets and social functions implemented in our shop may not be available to you.

#14: Can you disable cookies?

Yes, you can manage cookie settings in your web browser. You can block all or selected cookies. You can also block cookies from specific websites. You can also delete previously saved cookies and other site and plug-in data at any time.

Web browsers also offer an incognito mode option. You can use it if you do not want the information about visited sites and downloaded files to be saved in your browsing and download history. Cookies created in incognito mode are deleted when all incognito windows are closed.

Browser plug-ins are also available to control cookies, such as Ghostery (<https://www.ghostery.com>). The option to control cookies may also be provided by additional software, in particular anti-virus packages, etc.

In addition, there are tools available on the Internet that allow you to control certain types of cookies, in particular for collective management of behavioural advertising settings (e.g. www.youronlinechoices.com/, www.networkadvertising.org/choices).

Remember that disabling or limiting the use of cookies may prevent you from using some of the functions available in our shop and cause difficulties in using our shop, as well as many other websites that use cookies.

#15: For what purposes do we use first-party cookies?

First-party cookies are used to ensure the proper functioning of particular shop mechanisms, such as maintaining the session after logging in to the account, remembering recently viewed products and products added to the cart.

First-party cookies also store information about the cookie settings defined by you, made from the level of the cookie management mechanism.

First-party cookies are also used to support the abandoned carts recovery mechanism.

#16: What third-party cookies are used?

The following third-party cookies are used in our shop:

- Google Analytics,
- YouTube.

Details on individual third-party cookies are described below.

Google Analytics - details

We use the Google Analytics tool provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. We carry out activities in this respect based on our legitimate interest that is the creation of statistics and their analysis in order to optimise our websites.

In order to use Google Analytics, we have implemented a special Google Analytics tracking code in the code of our website. The tracking code uses Google LLC cookies for the Google Analytics service. You can block the Google Analytics tracking code at any time by installing the browser add-on provided by Google: <https://tools.google.com/dlpage/gaoptout>.

Google Analytics automatically collects information about your use of our website. The information collected in this way is most often transferred to Google servers which can be located all over the world and stored there.

Due to the IP anonymisation activated by us, your IP address is shortened before forwarding. Only in exceptional cases the full IP address is transferred to Google servers and shortened there. As a rule, the

anonymised IP address provided by your browser as part of Google Analytics is not combined with other Google data.

We emphasise that in Google Analytics we do not collect any data that would allow your identification. Therefore, the data collected in Google Analytics is not considered personal data by us. The information we have access to in Google Analytics include, in particular:

- information about the operating system and web browser you use,
- the subpages you browse within our shop,
- time spent in our shop and on its subpages,
- transitions between individual subpages,
- the source from which you go to our shop,

In addition, in Google Analytics we use the following Advertising Functions:

- demographic and interest reports,
- remarketing,
- advertising reporting functions, user-ID.

As part of the Advertising Functions, we also do not collect personal data. The information we have access to include, in particular:

- your age range,
- your gender,
- your approximate location limited to the city,
- your interests based on your online activity.

Google Analytics and Google Analytics 360 services have been certified by the independent security standard ISO 27001. ISO 27001 is one of the most recognised standards in the world and certifies compliance with the relevant requirements by systems supporting Google Analytics and Google Analytics 360.

If you are interested in the details related to the use by Google of data from websites and applications that use Google services, we encourage you to read this information:
<https://policies.google.com/technologies/partner-sites>.

YouTube - details

Our pages contain embedded YouTube widgets that allow you to play videos available on YouTube directly from our pages. YouTube is operated by Google LLC.

Videos are embedded on the website in the privacy protection mode. Based on the information provided by YouTube, this means that no cookies are stored on your device and Google does not collect any information about you until you play the video.

When you play the video, YouTube saves cookies on your device and receives information that you have played the video from a specific website, even if you do not have a Google account or are not currently logged in. If you are logged in to your Google account, this service provider will be able to directly assign the visit to our website to your account. The purpose and scope of data collection and its further processing and use by Google, as well as the possibility of contact and your rights in this regard and the possibility of making settings to protect your privacy are described in the Google privacy policy.

If you do not want Google to assign the data collected during playing a video directly to your profile, you must log out of your account before playing the video. You can also completely prevent loading of plug-ins on the website by using appropriate extensions for your browser, e.g. script blocking.

The information collected in cookies related to YouTube videos embedded on our websites is used by Google to ensure the proper and safe functioning of a widget, to analyse and optimise the services provided by YouTube, as well as for personalisation and advertising purposes.

Remember that while playing videos available on YouTube, you are using the services supplied electronically by Google LLC. Google LLC is an independent entity providing electronic services to you. Details on the rules of using YouTube, including privacy protection, can be found in documents provided directly by YouTube:

- regulations: <https://www.youtube.com/t/terms>,
- privacy policy: <https://policies.google.com/privacy>.

#17: Do we track your behaviours within our shop?

Yes, we use Google Analytics tools that collect information about your activity in our shop. This tool is described in detail in the third-party cookie question, so we will not repeat this information here.

#18: Do we target advertising at you?

No, we don't use tools like Facebook Ads or Google Ads, so no targeted ads are created.

§19: How can you manage your privacy?

The answer to this question can be found in various parts of this privacy policy when describing individual tools, behavioural advertising, consent to cookies, etc. However, for your convenience, we have gathered this information once again in one place. Below you will find a list of options for managing your privacy.

- cookie settings in the web browser,
- browser plug-ins supporting the management of cookies, e.g. Ghostery,
- additional cookie management software,
- incognito mode in a web browser,
- Google Analytics Opt-out: <https://tools.google.com/dlpage/gaoptout>,

#20: What are server logs?

Using the shop involves sending queries to the server on which the shop is located. Each query directed to the server is saved in the server logs.

Logs include, i.a.: your IP address, server date and time, information about the web browser and operating system you use. Logs are saved and stored on the server.

The data stored in the server logs are not associated with specific individuals using the website and are not used by us to identify you.

The server logs are only auxiliary material used to administer the website, and their content is not disclosed to anyone except those authorised to administer the server.

#21: Is there anything else you should know?

As you can see, the issue of personal data processing, the use of cookies and general privacy management is quite complicated. We have made every effort to ensure that this document provides you with as much knowledge as possible on issues important to you. If anything is unclear to you, you want to know more or just talk about your privacy, contact us at roribox@roribox.com.