

# Privacy Notice

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## Intro

Zviropolis (“**Zviropolis**” or “**we**”) welcomes you. This Privacy Notice (“**Privacy Notice**”) applies to our website (“**Website**”) and CRM system (“**CRM**”) available at <https://zviropolis.pl/>.

The Privacy Notice describes which of your personal data Website / CRM collects, how stores, processes, and uses it, and what happens when you use the Website / CRM.

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## About us

We are the controller of your personal data processed through the Website / CRM. This means that we determine the purposes and means of personal data processing.

|                            |                               |
|----------------------------|-------------------------------|
| <b>Name</b>                | _____                         |
| <b>Registration number</b> | _____                         |
| <b>Address</b>             | _____                         |
|                            | _____ – for general inquiries |

Email

\_\_\_\_\_ – for privacy inquiries

## About you

When you visit the Website / CRM, you become our user (“**User**”).

We divide the Users into categories so you can easily find details about the processing of your personal data. Pay attention that you can fall into several categories depending on your actions.

| Type of User     | Description  |
|------------------|--|
| Visitor          | User who visits our website.   |
| Potential Client | User who has left an inquiry about our services via any available form of communication. |
| Client           | User who is registered in our CRM to receive services.                                   |

**Please note!** We do not knowingly process the personal data of Users under the age of \_\_. If you are such a User or the legal representative of such a User, please [contact us](#).

## Personal data

### Sources of data

We receive your data when you visit the Website / CRM and interact with it, depending on your actions on the Website / CRM.

You can change your personal data by exercising your right to rectification or by the Website / CRM functionality. Please note that the same lawful basis and storage terms apply to the changed data.

We may also (although we do not necessarily do so) receive [data from third parties](#). It depends on your settings and the features you use.

### Lawful bases for processing

To process your personal data, we rely on the following lawful bases:

- **performance of the contract** — for the processing of personal data necessary for the negotiating on, conclusion, and performance of a contract (mainly, the Terms of \_\_\_\_\_) with you;
- **legitimate interest** — for the processing necessary for the development of our services, taking into consideration your interests, rights, and expectations;
- **legal obligation** — for the processing as required by applicable laws (for example, to comply with tax or KYC/AML regulations) or if requested by a law enforcement agency, court, supervisory authority, or another state-authorized public body;
- **consent** — for additional specific purposes.

If we collect personal data on the basis of legitimate interest or performance of the contract, we can use it for another purpose after checking that the new purpose is compatible with the original purpose.

When your data processing is based on a legal obligation or performance of the contract, you are obliged to provide your personal data. We need this data to comply with legal requirements or to properly provide you with our services. The failure to provide such data may have negative consequences, such as tax liability, inability to enter into a contract or provide services to you, etc.

## Visitors' data

When you visit the Website, we collect some data automatically. We collect some technical data about the Users to optimise performance, debug issues, and enhance features while ensuring security and privacy to improve the overall user experience.

Most of the technical data we collect are anonymous, but some data is associated with your IP address and device ID. Please read about personal technical data below.

| Data  | Reasons for processing  | Lawful basis        |
|---|---|---------------------|
| Information about the coarse location (IP address, country)   | The optimization of the performance, debugging, enhancement of the features' proper functioning, administering and improvement of the Website | Legitimate interest |
| Technical device information and network information (including IP address, HTTP user agent, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks) |   |                     |
| <b>Data storage</b>   |   |                     |
| We store the data for 3 years from its collection   |   |                     |

We also need cookies to operate, support, and improve the Website's functionality.

| Data               | Description  | Reasons for processing                         | Lawful basis                |
|--------------------|--|--|-----------------------------|
| Necessary cookies  | Information that is necessary for the operation of the Website   | Improving your experience of using the Website | Performance of the contract |
| Marketing cookies  | Marketing information used to match relevant advertising to you  | Marketing                                      | Consent                     |
| Preference cookies | Information necessary for operating some services on the Website | The operation of some services on the Website  | Consent                     |

| Statistics cookies | Statistical data used to understand how you interact with the Website | Improvement of the Website and analysis of the statistic for other purposes | Consent |
|--------------------|---|---|---------|
| Data storage       |   |   |         |
| Cookies            |   | Stored during the expiry period provided in our Cookie Policy.              |         |

## Potential clients' data

Data collected at the inquiry stage:

| Data   | Reasons for processing  | Lawful basis                                  |
|--|---|---|
| Identification   |   |   |
| First name, last name, company name / title              | Identifying the person who submitted the inquiry; addressing communications correctly | Performance of a contract                     |
| Contact  |   |   |
| Email address, phone number, preferred contact channel   | Responding to the inquiry; follow-up communication about our services                 | Legitimate interest; consent where applicable |
| Country / region   | Determining applicable service offering and jurisdiction                              | Legitimate interest                           |
| Inquiry content  |   |   |
| Message content, described needs, questions asked        | Understanding the potential client's needs; preparing a relevant offer                | Performance of a contract                     |
| Channel of inquiry (form / email / phone / social media) | Tracking communication history; routing to the right team                             | Legitimate interest                           |
| Date and time of inquiry                                 | Maintaining communication log; response time tracking                                 | Performance of a contract                     |

## Clients' data

### General information

When we collect the personal data:

| Data   | Reasons for processing   | Lawful basis                                    |
|--|--|---|
| Identification   |  |   |
| National ID number, tax ID, identifier type, customer type & title, household ID   | Verifying customer identity, tax compliance, account registration, classification of customer type           | Legal obligation; contract performance          |
| Gender, date of birth  | Statistical analysis and customer segmentation   | Legitimate interest (anonymised where possible) |
| Contact & address  |  |   |
| Invoice address, billing address, building & unit number, territory code, country, foreign ID  | Delivering invoices and correspondence, determining service location, registering delivery address           | Contract performance; legitimate interest       |
| Financial & billing  |  |   |
| VAT status, split payment type, invoice category, refund ID, bank account, NIP verification, KSeF ID, price list, margins, active VAT flag | Invoicing, payment processing, VAT reporting, e-invoicing via KSeF, pricing calculations, processing refunds | Legal obligation; contract performance          |

### Marketing data

When we collect the personal data:

| Data   | Reasons for processing   | Lawful basis                |
|--|--|-----------------------------|
| Consents & marketing   |  |                             |
| Consent to SMS, email and data processing, third-party systems consent, opt-out records, right to erasure flag, signed agreement | Sending marketing communications via SMS and email, recording and managing consent, processing objections and erasure requests | Consent (Art. 6(1)(a) GDPR) |
| Loyalty & transactions   |  |                             |

|   |  |  |
|---|--|--|
| Loyalty points, customer classification, assigned warehouse, external system ID, gold certificate, straw quantity commodity account | Managing loyalty programme, purchase history tracking, customer segmentation, warehouse assignment | Performance of a contract, legitimate interest |
|---|--|--|

## Account data

When we collect the personal data:

| Data   | Reasons for processing   | Lawful basis                              |
|--|--|---|
| Loyalty & transactions   |  |   |
| Loyalty points, customer classification, assigned warehouse, external system ID, gold certificate, straw quantity commodity account                        | Managing loyalty programme, purchase history tracking, customer segmentation, warehouse assignment | Contract performance; legitimate interest |
| Account & system   |  |   |
| Web portal password, service block flag, additional user name, custom fields, email tags, modification timestamp, customer group, barcode, document person | Managing portal access and account lifecycle, system configuration, internal record-keeping        | Legitimate interest; contract performance |
| Veterinary & specialist  |  |   |
| Veterinarian flag & account, dealer ID, authorised representative, default vendor, government/ institution category, KSeF internal ID                      | Managing specialist customer categories, supplier and dealer relationships, authorisation records  | Contract performance; legal obligation    |

## Contract & legal

| Data   | Reasons for processing  | Lawful basis                           |
|--|---|--|
| Contract number, contract date, contract end date, related-party flag, contract type, herd evaluation record | Contract management, legal evidence of agreements, transfer pricing documentation | Contract performance; legal obligation |

## Data received from third parties

We may receive some personal data from third parties, and we may also transfer personal data to third parties in order to provide our services. The amount of data collected, the purposes, and the lawful basis for processing is determined by the respective privacy documents of these third parties.

| Category of data  | Third party                   | Privacy documents  |
|---|-------------------------------|--|
| Veterinary clinic management data: customer records, visit history, vaccination certificates, order data, contact details | BRI sp. z o.o.                | Polityka Ochrony Prywatności – <a href="http://klinikaxp.pl">klinikaxp.pl</a> ↗        |
| Website usage data: pages visited, session duration, device type, approximate location, traffic source                    | Google LLC (Google Analytics) | Google Privacy Policy – <a href="http://policies.google.com">policies.google.com</a> ↗ |

## Data sharing with third parties

We can share your personal data with third parties without any harm to you and in full compliance with applicable law. In addition, we have implemented organisational and technical measures to ensure the security of personal data during data transfer to third-party.

| Third parties                                    | Description  |
|--|--|
| Analytics tools                                  | We use analytics tools to understand and promote our business.   |
| Payment services                                 | We use payment services to process your payments and other transactions.   |
| Social networks                                  | We use various social networks to spread information about our activities.   |
| Messengers                                       | We use messengers to communicate with you in ways that are convenient for you.   |
| Data storage services                            | We use various cloud services that allow us to securely store data on remote servers.  |
| Contractors, services providers on Website / CRM | We cooperate with service providers and contractors to provide you with their services, operate, develop and improve the features and functionality of the Website / CRM, fulfill your support requests, complete payment transactions, etc. |
| Providers of the services our team use           | We use CRM systems, messengers, and other services in our organisation to provide you with our services.   |
| State authorities, courts, law                   | We may be obliged to transfer some of your data to tax authorities, courts, law enforcement agencies, and other governmental bodies:   |

|  |   |
|--|---|
| enforcement agencies, etc  | <ul style="list-style-type: none"> <li>● to comply with a government request, court order, or applicable law;</li> <li>● to prevent unlawful use of the Website / CRM;</li> <li>● to protect against claims of third parties;</li> <li>● to help prevent or investigate fraud.</li> </ul> |
| To get a detailed list of the third-party recipients of your personal data, <a href="#">contact us</a> . |   |

To share your data, we rely on the following lawful bases, depending on the case: consent, compliance with the law, and performance of a contract.

## Data sharing outside the European Economic Area

The personal data we collect is stored in EU.

We may share personal data with the recipients of other countries, including non-EEA ones, ensuring that your data is protected and processed in accordance with the General Data Protection Regulation.

To share the data outside the EEA, we rely on the adequacy decision by the European Commission or the Data Privacy Framework participation of the recipient.

If the recipient does not participate in the Data Privacy Framework and its country is not deemed to provide an adequate level of protection for your personal data, we adopt Standard Contractual Clauses based on legislation assessments for data protection during transfer and storage.

You can read more detailed measures to protect your personal data [here](#).

## Data protection

We apply a variety of security measures appropriate to the possible risks.

| Organisational measures         |                                    |
|---------------------------------|------------------------------------|
| Staff training                  | Internal policies and instructions |
| Non-disclosure agreements (NDA) | Transfer protection                |
| Access control mechanism        |                                    |

| Physical measures          |
|----------------------------|
| Video monitoring           |
| Limited access to premises |

| Technical measures        |                    |
|---------------------------|--------------------|
| Two-factor authentication | Backups            |
| Firewalls                 | Encryption of data |

|                         |                       |
|-------------------------|-----------------------|
| Implementation of HTTPS | End-to-end encryption |
|-------------------------|-----------------------|

## Data subjects rights






You, as a data subject (individual), have the right to interact with your data directly or through a request to us. This section describes these rights and how you can exercise them depending on your residency.

| Right  | Description  |
|--|--|
| Right to access  | You can request information on whether personal data are being processed, and, where that is the case, access to this personal data and the information required by law. |
| Right to rectification   | You can change the data if it is inaccurate or incomplete.   |
| Right to erasure   | You can send us a request to delete your personal data from our systems. We will remove them unless otherwise provided by law.   |
| Right to restrict the processing   | You may partially or completely prohibit us from processing your personal data in cases provided by law.   |
| Right to data portability  | You can request all the data you provided to us and request to transfer data to another controller.  |
| Right to object  | You may object to the processing of your personal data that is collected on the base of legitimate interest.   |
| Right to withdraw consent  | You can withdraw your consent at any time.   |
| Right to file a complaint  | If your request was not satisfied, you could file a complaint to the regulatory body.  |
| To exercise your rights, <a href="#">contact us</a> .  |  |
| We will answer your request within one month. If your request is not satisfied, you can submit a complaint to your local Data Protection Authority. You may find it <a href="#">here</a> . |  |

## Cookies

We use cookies that are needed for the Website's operation. By using cookies, we receive automatically collected data. You can read more in the Cookie Policy.

If you want to turn off cookies, you can find instructions for managing your browser settings at these links:

|   |   |  |   |
|---|---|--|---|
|  <a href="#">Internet Explorer</a> |  <a href="#">Firefox</a> |  <a href="#">Chrome</a> |  <a href="#">Opera</a> |
|  <a href="#">Microsoft Edge</a>    |  <a href="#">Vivaldi</a> |  <a href="#">Safari</a> |  <a href="#">Brave</a> |

## Privacy Notice updates

This Privacy Notice is developed according to the General Data Protection Regulation, other applicable privacy laws, and best privacy practices.

Existing laws and requirements for the processing of personal data are subject to change. In this case, we will publish a new version of the Privacy Notice on the Website / CRM.

If there are material changes to the Privacy Notice or the Website / CRM that affect your data privacy rights, we will notify you by displaying information on the Website / CRM and, if necessary, ask for your consent.