General Information

- 1. Definitions
- 1.1 Seller entity using the idosell.com service provided by IAI S.A.
- 1.2 Shop the Seller's website (www) enabling the Buyers to make purchases via the Internet.
- 1.3. Buyer or User a natural person, legal entity or organizational unit without legal personality, to which the statute grants legal capacity, who makes online purchases from the Seller (Shop's Customer).
- 2. Smile is a system supporting faster purchases made by Buyers in the Seller's Shops, using the services of IAI S.A.. Thanks to Smile, the Buyer avoids entering the same shopping data multiple times, in subsequent Shops. Smile remembers the preferences, including the selected method of payment with the credit card details (which for the Buyer are shown in the form, where only the last 4 digits of the card number are visible), preferred forms and places of delivery of goods, address and contact details, IP address, the URL of the website, information about the device and the browser used by the User, as well as the personal data enabling the purchase, which are used when creating accounts and logging into the Shops using social media accounts (e.g. Facebook) or the Smile account (an account in the service of IAI S.A, which can also be used by Buyers).
- 3. The use of the Smile service by the Buyer requires a telephone number or e-mail address to which a PIN number is sent for log-in or approval of transactions (purchases) or authentication (authorisation) using a social media account (e.g. Facebook).
- 4. When using the Smile service, the Buyer may additionally use a mechanism for easy and secure login through the use of a screen lock access key or unlock using facial recognition or fingerprint to confirm their identity, in which case the Smile system will prompt the Buyer to accept the installation of keys on their mobile device using Android and iOS capabilities. The access keys are securely stored in the Buyer's device's operating system credentials manager and will only be used for Smile purposes. A screen lock secures access to encrypted data such as access keys on Buyer's devices.
- 5. The Buyer agrees to the processing of his personal data indicated under point 2 in the Smile system by IAI S.A. and by the Sellers from whom the Buyers will make purchases in the Shops in the latter respect, the data will be at the same time treated as data entrusted by the Seller to IAI S.A. in accordance with the current terms and conditions of the idosell.com service. IAI S.A. will transfer personal data only to those Sellers with whom Buyers who have given their consent within the Smile system start shopping. For the processing of Buyers' personal data to the remaining extent, Sellers shall obtain a separate consent and conclude an agreement on processing of personal data, which is concluded, among others, because IAI S.A. is the owner of the servers and software used by the Shop. This policy applies to the personal data of Buyers in the Smile system.

6. The Administrator of the personal data of the Smile system is IAI S.A. with its registered office at 30 Piastów Avenue, 70 - 064 Szczecin, entered in the Register of Entrepreneurs under No. 0000891870, NIP: 5252767146, REGON: 381595506(hereinafter: "IAI").

Purpose of data collection

- 7. By logging in to the Shops operated by IAI S.A. or creating an account therein, e.g.: online shops using the IdoSell system or shopping in the Shops and using Social Login to do so, i.e. using an account on services such as, but not limited to: Facebook, Google, PayPal or any other using OpenID, the User provides IAI with his personal data indicated in point 2 above if he agrees to use Smile when creating an account or logging in or shopping in the Stores.
- 8. When logging in or creating an account in a subsequent Store or shopping in a Store, the Buyer will see on the screen a completed form containing his data. This data is not yet seen or known by the Buyer using the Smile service at the same time. They are only available in the User's web browser. The data will only be transferred to the merchant (e.g. an online shop) when the buyer himself decides to do so by agreeing to use Smile. Smile therefore works analogously to the auto-complete system available in web browsers.
- 9. The personal data of Smile Users (Buyers) are processed by IAI S.A. in order to accelerate the conclusion of online transactions in the Stores. This scope includes:
 - a. creation of anonymised and aggregated reports and analyses aimed at increasing the usability of the services provided;
 - b. analysis over time of preferences regarding forms of payment, addresses and methods of delivery of goods, User correspondence data;
 - c. presentation to the User of optional offers for delivery, payments available in the respective Shop at the time of payment for goods or services in the Seller's Shop.

Method of data collection

- 10. In order to ensure the smooth functioning of Smile, once the Buyer has used this system, Smile uses cookies to better identify the Buyer.
- 11. The User can independently and at any time change the settings regarding cookies, including blocking them completely, specifying the conditions for storing and accessing cookies on the User's device. These settings can be changed via the settings of your Internet browser. However, such a change may cause Smile to function incorrectly. These settings can be changed, in particular, in such a way as to block the automatic handling of "cookies" in the settings of the web browser or inform about their placement on the User's device each time.

Detailed information on the possibility and methods of using cookies is available in the settings of your software (web browser).

- 12. IAI may use individual, invisible pixels embedded in the website in order to recognise a returning User and collect information about new User preferences.
- 13. Cookies and pixel calls are commonly used on the internet and are completely safe for the User. The User is in no way at risk of their device being infected with a virus or installing unwanted or malicious software.
- 14. Users' personal data is stored in a database in which technical and organisational measures are applied to ensure the protection of the processed data in accordance with the requirements set out in the applicable legislation.

Final provisions

- 15. The Buyer's data, including personal data, will be stored for a period not longer than necessary in connection with the Buyer's use of Smile or the performance of the service (e.g. complaint handling), and will then be deleted from the system.
- 16. IAI S.A., on the basis of an agreement, entrusts the processing of the personal data referred to in this Policy to external entities for the purpose of proper performance of activities related to hosting, administration, maintenance and management of the service, to which the Buyer agrees. The transfer of the Buyer's data for the purpose of performance of the entrustment agreement referred to above shall take place at the moment of provision of such data by the Buyer to IAI S.A.
- 17. The Buyer may at any time withdraw his consent to the processing of his personal data in the Smile service and resign from using this service. To do so, he should send his request to gdpr-inspector@idosell.com. This does not result in the deletion of his data at the Sellers with whom the Buyer has made a purchase and for which the Seller is the data controller independently of the Smile service. In the event that the Buyer's use of the Smile system is terminated, the Buyer must have a separate login and password for the Shop account or make purchases without creating an account.
- 18. In the case of questions, doubts or comments raised by the Buyer, IAI S.A. can be contacted at the email address gdpr-inspector@idosell.com.