### - PRIVACY POLICY -

### FS Philipiak sp. z o. o.

### § 1. Data of the Administrator

- 1. This document governs the rules for the collection and processing of personal data of users accessing the website named "Cookover" (hereinafter referred to as the "Website"), available at https://cookover.ro/.
- 2. The administrator of personal data made available through the Website is FS Philipiak spółka z ograniczoną odpowiedzialnością, with its registered office in Warsaw, Poland (04-462), at 63/65 Strażacka Street (ul. Strażacka 63/65), entered into the Register of Entrepreneurs of the National Court Register (Rejestr Przedsiębiorców Krajowego Rejestru Sądowego) maintained by the District Court for the Capital City of Warsaw, XIV Commercial Division of the National Court Register (Sąd Rejonowy dla m.st. Warszawy w Warszawie, XIV Wydział Gospodarczy Krajowego Rejestru Sądowego) under KRS No.: 0001133340, REGON: 529943953, NIP: 9522261833 (hereinafter referred to as the "Administrator").
- 3. Contact with the Administrator regarding the processing of personal data provided in connection with the use of the Website may be made via:
  - a. traditional mail at the address: ul. Strażacka 63/65, 04-463 Warszawa (Warsaw, Poland)
  - b. email at: contact@philipiak.com;
  - c. telephone: +48 508 020 741.

#### § 2. Protection and Processing of Personal Data

- 1. All personal data provided are processed by the Administrator in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 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), hereinafter referred to as the "GDPR," as well as other applicable provisions of Polish law, in particular the Act of 18 July 2002 on the Provision of Services by Electronic Means.
- 2. The Administrator implements technical measures required under current data protection regulations to prevent unauthorized access to or modification of personal data transmitted electronically.
- 3. During the use of the Website, personal data relating to user activity may be collected and subsequently recorded in server logs. Servers automatically record and store such information electronically.
- 4. Personal data collected for processing may include:
  - a. unique IP address;
  - b. name of the Internet service provider;
  - c. city, region, and country from which the user accesses the Website;
  - d. type of internet browser or device used;
  - e. number of clicks performed on the Website;
  - f. date and time of the user's visit to the Website;
  - g. the website from which the user was redirected to the Website;
  - h. subpages of the Website visited by the user.
- 5. Collected personal data are processed for the purposes of:
  - a. analyzing traffic on the Website and visitor statistics;
  - b. improving the functionality and performance of the Website;
  - c. measuring the effectiveness of advertising campaigns;
  - d. conducting anonymous remarketing activities;
  - e. fulfilling legal obligations imposed on the Administrator by applicable law.

- 6. Personal data provided are processed by the Administrator pursuant to Article 6(1)(f) GDPR for purposes arising from the legitimate interests pursued by the Administrator. The Administrator's legitimate interest consists of analyzing website traffic to improve functionality and the quality of presented content, as well as conducting direct marketing of products offered by the Administrator and other entities cooperating with the Administrator.
- 7. Recipients of the personal data provided include:
  - a. FS Philipiak spółka z ograniczoną odpowiedzialnością, with its registered office in Warsaw, Poland (04-462), at 63/65 Strażacka Street (ul. Strażacka 63/65), entered into the Register of Entrepreneurs of the National Court Register (Rejestr Przedsiębiorców Krajowego Rejestru Sądowego) maintained by the District Court for the Capital City of Warsaw, XIV Commercial Division of the National Court Register (Sąd Rejonowy dla m.st. Warszawy w Warszawie, XIV Wydział Gospodarczy Krajowego Rejestru Sądowego) under KRS No.: 0001133340, REGON: 529943953, NIP: 9522261833;
  - b. entities providing services necessary to establish contact with the user at the provided telephone number, including entities providing website hosting and security services;
  - c. state authorities authorized to receive such data under separate provisions of law.
- 8. Personal data are collected automatically and stored for the period necessary to achieve the purposes for which they were collected.
- 9. Personal data may be transferred to third countries or international organizations outside the European Economic Area. For example, data may be transferred to entities within the Google group. Such transfers will occur only if adequate safeguards are ensured and effective legal protections for the data are in place.
- 10. Personal data may be processed in an automated manner (including profiling), but in such a case, it shall not produce any legal effects or significantly affect the user's situation. Profiling by the Administrator consists of processing data (including automated processing) to assess certain aspects relating to the user, including analyses, statistics, or predictions concerning the user's interests and personal preferences, as well as for marketing activities conducted by the Administrator, including presenting advertisements and commercial offers.
- 11. The user has the following rights regarding the processing of personal data:
  - a. The user has the right to access their personal data (Article 15 GDPR) and may verify or rectify them (Article 16 GDPR), as well as request their deletion by submitting an appropriate request to the Administrator (Article 17 GDPR).
  - b. The user has the right to restrict processing (Article 18 GDPR) and the right to data portability (Article 20 GDPR). If personal data are processed in violation of legal requirements, the user has the right to lodge a complaint with the competent supervisory authority the President of the Personal Data Protection Office (Prezes Urzędu Ochrony Danych Osobowych).
  - c. The user has the right to object to the processing of personal data (Article 21 GDPR).

## § 3. Cookies

- 1. Cookies are IT data stored on users' end devices, intended for use with websites. Cookies allow recognition of the user's device and proper display of the website according to individual preferences. Cookies typically contain the name of the website they originate from, the period of storage on the end device, and a unique number.
- 2. Cookies are used for the purposes of:
  - a. adapting the content of websites to the individual user's preferences. They also serve to optimize
    the use of websites cookies enable proper display of website content in accordance with the user's
    preferences.;

- b. creating anonymous, aggregated statistics, which help understand how users interact with the website, enabling improvement of its structure and content without personally identifying the user.
- 3. Cookies do not contain identifying data, and the user's identity cannot be determined based on them. Cookies do not alter user's settings or installed software settings. Their content can only be read by the server that created them. Cookies are encrypted to prevent unauthorized access.
- 4. Cookies are not used for processing personal data. Data collected via cookies may only be collected for performing specific functions for the user.
- 5. Two types of cookies are used on websites:
  - a. "Session cookies" are temporary files that remain on the user's device until the user leaves the website or closes the software (browser).
  - b. "Persistent cookies" are files that remain on the user's device for the period specified in the cookie parameters or until manually deleted by the user.
- 6. By the type of data collected, cookies may be classified as:
  - a. "Technical cookies" enable the use of services available on the website and memorizing individual user preferences and interface personalization (e.g., font size, language).
  - b. "Security cookies" ensure the security of using the website.
  - c. "Analytical cookies" allow collecting information on how the website is used.
  - d. "Marketing cookies" allow delivering advertising content tailored to the user's interests.
- 7. In addition to cookies created by the Website, "external cookies" may also be used, originating from external providers of analytics and advertising services. External entities may use cookies to collect anonymous data on user activity on the Website and other sites, for the purpose of presenting targeted advertisements (remarketing).
- 8. External cookie providers include, among others:
  - a. Google LLC
  - b. Meta Platforms Ireland Ltd.
- 9. Cookies used by partners of the Website operator, including users of the website, are subject to their own privacy policies.
- 10. By default, web browsing software allows cookies to be stored on the end device. These settings can be changed to block automatic handling of cookies in browser settings or to notify the user each time cookies are sent to user's device. Detailed information on managing cookies is available in software settings (browser). Limiting the use of cookies may affect some functionalities of the website and hinder its use.
- 11. Cookies, once stored, may be deleted using browser functions, dedicated programs, or appropriate tools available in the user's operating system.

# § 4. Changes to the Privacy Policy

- 1. The Privacy Policy was published on 03.12.2025.
- 2. Updated information will take effect from the date of publication on the Website and will regulate the manner in which personal data are collected and used from the moment of change without prejudice to the rights of Website users arising from the provisions of the Privacy Policy prior to such changes.