Privacy Policy - CP Witter Ltd profiles in social media

Part I – General provisions

§ 1 Administrator

- 1. The administrator of your personal data is us, i.e. CP Witter Ltd based in Shrewsbury. Further in the Privacy Policy, we refer to ourselves as "Administrator" or "We".
- 2. Our registration files are kept by the Companies House in the UK. Our company registration number is 01362420. Tax number is GB310373700. Our files contain the most important information about us, e.g. financial statements and the articles of association of our company.
- 3. You can contact us:
- a. by letter: C/O Dyke Yaxley Limited, 1 Brassey Road, Old Potts Way Shrewsbury, SY3 7FY, UK
- b. by e-mail: ea-ger-info@horizonglobal.com

§ 2 Terms used in the Privacy Policy

If you notice one of the following terms written with a capital letter later in our Privacy Policy, you should understand them in accordance with the definitions below:

- a. "Policy" means this document, i.e. the privacy policy you are reading,
- b. "GDPR" 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. You can find the text of the GDPR here,
- c. "Social media" the social networking site we use, i.e. Facebook.

§ 3 Your rights regarding personal data

- 1. We process your personal data, therefore:
 - a. you have the right to access your personal data,
 - b. you can correct them,
 - c. you can request the deletion of your personal data if the GDPR allows it,
 - d. you have the right to limit processing to the extent specified in the GDPR.
- 2. In parts II and III of the Policy, you will find information about additional rights. In some situations, you will have additional options.
- 3. Do you want to exercise your rights or learn more about them? Contact us. Our contact details can be found in § 1 section 3 of this Policy.

§ 4 The right to object

- 1. After providing us with your personal data or if we collect it ourselves, you can exercise your right to object. You have it in two situations when we process your personal data:
 - a. for direct marketing purposes; you do not have to justify such an objection;

- b. based on our other legitimate interests; such an objection must be justified by your particular situation. Tell us why we should not process your data.
- 2. Do you want to exercise your right to object? Contact us. Our contact details can be found in § 1 section 3 of this Policy.

§ 5 Complaint to the President of the Personal Data Protection Office

If you believe that we are processing your personal data unlawfully, you can lodge a complaint with the supervisory authority. In the UK you make a complaint to the Information Commissioner's Office (ICO) or get advice from the ICO. (https://ico.org.uk/make-a-complaint/data-protection-complaints/)

§ 6 Personal data security

We use technical measures required by current provisions on the protection of personal data to prevent unauthorized persons from obtaining and modifying personal data sent electronically, i.e. within our Store.

§ 7 Threats

We would like to point out that the threats related to the use of social media include: malware, spyware, information phishing by impersonating trustworthy entities (so-called phishing), hacker activities aimed at breaking into IT systems.

§ 8 Questions about the Policy and where it is published

If you have any questions about the Policy, please let us know.

Part II – our social media profiles

§ 9 Using our social media profiles

If you use our social media profile, please pay attention to the following:

- a. For what purpose and on what legal basis do we process your personal data?
- b. How long will we process your data?
 - For the time needed to carry out the activities described above, i.e. replying to your messages, conducting discussions in social media and achieving the above marketing and statistical purposes. However, we will not process your personal data longer than until you object.
- c. What are your rights?
 - We described them in § 3 and 4 of this Policy.
- d. Do you have to provide us with your data?
 - This is voluntary. However, due to the rules applied by Social Media, we will see your name and surname or nickname and photo if you write to us or comment on our post.
 - 1) Who will we transfer your data to? Social media providers, i.e. Meta Platforms Ireland Limited,
 - 2) The entity handling our social media profiles.
- e. <u>Will we transfer your personal data outside the European Economic Area?</u>
 Your personal data will be transferred to the United States on the basis of the decision of the European Commission of July 10, 2023, issued pursuant to the regulation of the European Parliament and of the Council (EU), stating the adequate level of personal data protection provided under EU-US data protection. You can obtain a copy of your personal

data that we transfer outside the European Economic Area at any time. To do this, please contact us.

f. $\frac{\mbox{Will automated decisions be made based on your data, including profiling?}}{\mbox{NO.}}$