OUR PRIVACY POLICY

Funky Flava

This privacy policy describes out policies and procedures on the collection, use and disclosure of your information when you use www.highheelsintensive.com website. Below we explain what information is collected and how it is processed. The use and collection of data is limited to required minimum necessary to provide our service at highest level, under the art. 18 of electronically supplied services Act.

§1 General provisions

- The administrator of personal data of website users located under the www.highheelsintensive.com domain in compliance with European Parliament and Council Regulation 2016/679 from 27.04.2016 regarding security of individual persons in relation to processing of personal data and free movement of such information as well as annulment of Directive 95/46/WE (known as: General Data Protection Regulation) and data protection Act from 29.08.1997 (it is Dz. U. from 2016, pos. 922 with change – known later as personal data protection Act), is Jessica Ali, who operates the "FUNKY FLAVA JESSICA ALI" establishment headquartered in Gora, ul. Wladyslawa Reymonta 8 lok. 2, 56-200 Gora (then: "Funky Flava").
- 2. Communication with Funky Flava is possible via e-mail: info@funky-flava.com via contact form available at www.funky-flava.com or in writing to the following address: Funky Flava, ul. Wladyslawa Reymonta 8 lok. 2, 56-200 Gora.
- 3. Privacy policy purpose is to describe how we collect, use, store, process, and share your information collected via www.highheelsintensive.com, as well as procedures related to registration and attendance in classes, events organised by Funky Flava establishment, Jessica Ali and connected services and tools used by their users.
- 4. In order to learn conditions of privacy policy and personal data applicable for other websites, to which the user can be directed by clicking into links located on the service, we ask to review privacy policies located on those specific websites.
- 5. By using the service, the user accepts Privacy Policy and Cookies Policy (provided in another document) and full understanding of their contents.
- 6. If necessary, provisions in this policy may be changed.

§2 Personal data acquisition, collection, and storage

- User's personal data processing is in line with General Personal Data Protection, Personal Data Protection Act, and Electronically Supplied Services Act from 18.07.2002 (Dz. U. from 2017 pos. 1219 with futher change).
- Users are not obliged to provide personal data to be able to use the service. Personal data can be collected through the service, specifically and voluntarily shared by users. In that case, user's consent to process personal data is obtained in correlation with existing regulations on collection and processing of personal data before its acquisition and processing.
 - 2.1. In view of the above, processing of users' personal data is based on Art. 6 act 1. point a) of General Personal Data Protection, in relation to which processing is lawful

when the individual, whom the data is collected from, has consented to processing of personal data in one or multiple certain purposes.

- 2.2. Processing of personal data is consented by clicking into one of box selection on the website.
- 2.3. User has the right to withdraw his preference at any time, and it has no effect on conformity with processing policy, that was done based on consent given before.
- 3. In case of obtaining another consent from the user, his personal data can be processed by the administrator for marketing purposes, including directing information via e-mail to earlier specified e-mail address. When user voluntarily consents, personal data will be processed for marketing purposes by entities cooperating with the administrator.
- 4. Website does not serve as a collection and processing tool of special categories personal data (sensitive data).
- 5. Administrator makes every effort to protect individuals' protection, who's data applies to, and ensures that data collected is processed lawfully; collected for designated, lawful purposes, and are not further processes that are not compatible with their purpose; essentially rightful and adequate in correlation to purposes, to which they are being processed in form that enables user's identification.
- 6. User's personal data is stored for no longer than needed to achieve the aim of its processing.

§3 Purpose of personal data processing

- 1. Funky Flava is authorised to use collected and stored data:
 - a. To provide services to user
 - b. To conclude and provide services provided via e-mail
 - c. To adjust offer to user's interests, inc. promotional materials and commercial communication,
 - d. To communicate with users, in purpose of providing services, customer service, marketing purposes, via available communication channels, inc. e-mail and mobile,
 - e. To analyse information to improve services provided,
 - f. To conclude and provide services of the electronic services,
 - g. To qualify the user to the right age group,
 - h. To communicate with the user (e.g., to confirm the booking, in emergencies),
 - i. For marketing purposes of parties collaborating with the Administrator (with prior consent).
- 2. Funky Flava is authorised to store collected data only for the above-described purposes for no longer than necessary to provide services and achieve the aim of its processing.

§4 Data sharing

- 1. Funky Flava ensures that all personal data is collected for fulfilment of the commitments towards the user only (e.g., delivering subscribed contents or customer's panel services). This information will not be shared to third-party services, except:
 - a. A prior consent of individual persons, that the data applies to,
 - b. When the obligation to sharing the data results from current laws.

- 2. Funky Flava as the data administrator in within the meaning of Personal Data Protection act can contractually delegate collected data to be processed by other parties subject to art. 28 RODO.
- 3. Under the privacy policy, Funky Flava commits neither rent nor sell personal data of users. In case of restructuring or selling the establishment or its parts and full asset transfer or parts of it to new owner, personal data can be transferred to the new owner, to ensure continuation of services provision.
- 4. Funky Flava can share anonymous data to third-party service providers, trusted partners or research agencies to improve promotional and service attractiveness to its users, improve of overall quality and effectiveness of provided services or participation in research that will benefit welfare of the society.

§5 User control methods

- User, who's personal data is being processed has the right to insight into his data, its supplement, update, correction, temporary or permanent restriction of its processing, demand its removal or transfer. Insight, supplement, update, correction, processing restriction, demand of removal or transfer happens after the user's written request sent to e-mail address info@funky-flava.com. Such request must include full name of the user.
- 2. User ensures that all data provided or published in the service are correct.

<u>§6 Right to complain</u>

 We make every effort to ensure that personal data is processed lawfully. However, when you consider we have breached the policy, you can complain to Supervisory Authority (General Inspectorate for Personal Data Protection or the President of Personal Data Protection Office).

§7 Security

All data that is collected is secured with the use of adequate technological and organisational means, as well as security procedures aimed at securing their accidental destruction, loss, access of unauthorised persons or their unauthorised use.