

Privacy Policy

Controller:

The company

Nunofia s.r.o., with its registered office at Hviezdoslavova 30, Banská Bystrica 974 01, Slovak Republic, Company ID: 48 170 160, Tax ID: 2120074814, VAT ID: SK2120074814, registered in the Commercial Register maintained by the District Court Banská Bystrica, Section: Sro, File No.: 28162/S, represented by Ing. Vladislav Klajban, Managing Director of the company (hereinafter referred to as “Nunofia s.r.o.”)

Contact details: e-mail: info@nunofi.com, tel.: +421 48 412 3392

The processing of personal data is carried out in accordance with 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 (hereinafter referred to as the “GDPR”), and Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments to Certain Acts (hereinafter referred to as the “Personal Data Protection Act”).

1. Definitions

1.1. Data subject: A data subject is a natural person to whom the personal data relate, in particular a customer, visitor to the website, a person acting on behalf of a business partner, an employee or representative of a business partner, a person subscribing to commercial communications, or another person who communicates with the controller (hereinafter referred to as “you” or the “data subject”).

1.2. Business partner: For the purposes of this document, a business partner is any self-employed person or legal entity with whom the controller has entered into a legal relationship on the basis of which personal data are processed, or with whom the controller is negotiating the establishment of such a legal relationship (hereinafter referred to as the “business partner”).

1.3. Personal data: Personal data means any information relating to an identified or identifiable natural person, for example, first name and surname, permanent address, national identity card number, gender, age, e-mail address, telephone number, IP address, cookies, etc. (hereinafter referred to as “data” or “information”).

1.4. Special categories of personal data:

This category includes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, and data concerning a natural person’s health, sex life or sexual orientation.

1.5. Controller: The entity which determines the purposes and means of the processing of personal data, carries out the processing and bears responsibility for such processing (hereinafter referred to as “we” or the “controller”).

1.6. **Processor:** An entity which, on the basis of law or authorisation by the controller, processes personal data on behalf of the controller pursuant to a contract under Article 28 of the GDPR.

1.7. **Website:** The website means the controller's website available at the internet domain www.nunofi.com.

1.8. Purpose of the processing of personal data:

The reason why personal data are processed. Such a reason may be the performance of a contract, the administration of customer accounts, the handling of enquiries and complaints, the sending of commercial communications (newsletters), or the display of advertisements based on customers' interests.

1.9. **Cookies:** Short text files that are stored by your web or mobile browser. Most cookies contain a unique identifier, known as a cookie ID. Cookies are used to improve the functioning of websites, evaluate their traffic and better target marketing activities. We use non-essential cookies only on the basis of your prior consent granted through the cookie banner.

1.10. **Customer account:** A customer account means an electronic account created by a customer's registration on the website, which enables, in particular, the management of data, the management of orders and communication with the controller.

2. What personal data are processed?

2.1. We and our contractual processors, depending on the relevant legal basis and purpose of processing, process the following personal data or categories of personal data:

2.1.1. customer identification and billing data: first name, surname, billing address, and, where applicable, business name, registered office, Company ID, Tax ID or VAT ID, where the customer is a business;

2.1.2. customer contact details: e-mail address, telephone number and, where applicable, correspondence address;

2.1.3. customer account data: username, e-mail address, password in secure form;

2.1.4. data related to the order and contractual relationship: order history, goods ordered, price, payment method, delivery method, order status, data concerning complaints, withdrawal from the contract, communication and performance of the contract; 2.1.5. technical data: IP address, cookies, browser data, website traffic, access to the customer account;

2.1.6. data necessary for the performance of obligations under special legislation, including legislation in the field of prevention of money laundering and the financing of terrorism, where such obligations apply to the controller in a particular case: in particular, first name, surname, date of birth, national identification number, where necessary and permitted by law, permanent residential address or other residential address, nationality, type and number of identity document, data obtained from an identity document, data concerning a person acting on behalf of the customer, data concerning the beneficial owner, data concerning the

ownership and management structure, information as to whether the customer or beneficial owner is a politically exposed person or a person subject to sanctions, data concerning the purpose and intended nature of the transaction, data concerning the nature of the business, data concerning the transaction, payment, source of funds or source of wealth, and other data required by the relevant legislation;

2.1.7. special categories of personal data: The controller does not generally process special categories of personal data.

3. What is the source of personal data?

3.1. We process data which you provide to us, in particular when visiting the website, creating a customer account, submitting an order, paying the price, communicating by e-mail, telephone or online communication tools, or subscribing to commercial communications.

3.2. We also collect data automatically when you visit the website, in particular through cookies, logs, the IP address, device type, browser, website traffic data and data concerning the use of the website or customer account.

3.3. The provision of personal data is voluntary where the legal basis is the data subject's consent. Where processing is necessary for the conclusion or performance of a contract, failure to provide the necessary data may result in the contract not being concluded or properly performed. Where processing is necessary for compliance with a legal obligation, the provision of data may be a legal requirement.

4. Why are personal data processed?

Your personal data may be processed for the following purposes:

4.1. Performance of the contractual relationship, invoicing

4.1.1. **Purpose:** On the basis of a contract with us, you are entitled to the product or service ordered. We are entitled to payment of the agreed price. In order to fulfil our part of the obligation and verify the fulfilment of your part of the obligation, we need to process your identification and address details, contact details and other personal data connected with the contractual relationship.

4.1.2. **Legal basis:** Article 6(1) (b) GDPR – performance of a contract. The processing of personal data for the purpose of performing the contractual relationship is justified by the contractual relationship between you and us. The provision of personal data in this case is a contractual requirement, without which the contract cannot be concluded and performed.

4.1.3. **Retention period:** The retention period of the data is determined by the duration of the customer's contractual relationship with us and subsequently for the period required by specific legislation, in particular accounting and tax legislation.

4.2. Administration of customer accounts, Bonus Club and customer benefits

4.2.1. **Purpose:** Customers may register on the website and create a customer account, which enables, in particular, the management of personal data, the management of orders, an

overview of order history, easier ordering of goods and communication with the controller. For this purpose, we process, in particular, first name, surname, e-mail address, telephone number, login details, address details and order data.

4.2.2. Legal basis: Article 6(1) (b) GDPR – performance of a contract or taking steps prior to entering into a contract at the request of the data subject. To the extent that the customer voluntarily provides additional optional data within the account, the legal basis may be Article 6(1) (a) GDPR – the data subject’s consent.

4.2.3. Retention period: We process the data for the duration of the existence of the customer account. If the customer requests the cancellation of the account, we will delete or anonymise the customer account data, unless their further retention is necessary for the performance of the contract, the handling of a complaint, the protection of legal claims or compliance with legal obligations. An inactive account may be cancelled after 3 years from the customer's last login or last activity.

4.2.4. Purpose: If the customer is registered and uses the Bonus Club or other customer benefits, we process their personal data for the purpose of recording and administering bonus points, customer benefits, rewards and related benefits. For this purpose, we process, in particular, the customer's identification and contact details, customer account data, order data, the history of earning and redeeming bonus points and data concerning customer benefits used.

4.2.5. Legal basis: Article 6(1) (b) GDPR – performance of a contract or provision of the customer account service and customer benefits, or, where applicable, Article 6(1) (f) GDPR – the controller’s legitimate interest in administering the customer programme, where the benefit is not contractually guaranteed.

4.2.6. Retention period: We process the data for the duration of the customer account or the customer's participation in the Bonus Club and subsequently for the period necessary to protect legal claims or comply with legal obligations.

4.3. Communication with customers, handling of enquiries, complaints and claims

4.3.1. Purpose: We process personal data for the purposes of communicating with customers, providing customer support, handling questions, requests, submissions, complaints, claims, withdrawals from contracts and the exercise of rights arising from liability for defects. We also use the data to inform the customer about the status of the order, payment of the price, delivery of goods and other matters related to the performance of the contract.

4.3.2. Legal basis: To the extent that the communication is related to the order and the performance of the contract, the legal basis is Article 6(1) (b) GDPR – performance of a contract. To the extent that complaints, withdrawals from contracts and obligations under legislation are handled, the legal basis is Article 6(1) (c) GDPR – compliance with a legal obligation. To the extent that general customer support, the protection of rights and the recording of communication are concerned, the legal basis is Article 6(1) (f) GDPR – the controller’s legitimate interest.

4.3.3. Retention period: We process the data for the duration of the contractual relationship and subsequently for the period necessary for handling complaints, claims, the protection of

legal claims and compliance with legal obligations, generally for a maximum of 4 years after the termination of the contractual relationship, unless specific legislation requires a longer retention period.

4.4. Satisfaction assessment and reviews

4.4.1. Purpose: Following a purchase, we may contact the customer with a request to assess their satisfaction with the purchase or goods. If the customer voluntarily provides a review, we may process and publish it to the extent in which it was provided by the customer.

4.4.2. Legal basis: The legal basis for sending a reasonable request for a satisfaction assessment to an existing customer is Article 6(1) (f) GDPR – the controller’s legitimate interest in improving services and obtaining feedback. In the case of the publication of a review containing the customer’s identification details, the legal basis is Article 6(1) (a) GDPR – the data subject’s consent, unless the review is published anonymously.

4.4.3. Retention period: We process data processed for the purposes of satisfaction assessment for the period necessary to evaluate the feedback. We process reviews for the duration of the consent or until their removal.

4.5. Sending commercial communications and offering our products and services

4.5.1. Purpose: We regularly send our customers and those who have given their consent, by e-mail, news about our products and services. You may stop receiving these commercial communications at any time quickly and easily by using the unsubscribe link contained in each communication. You may also manage your preferences regarding the receipt of commercial communications in the settings accessible through each newsletter (unsubscribe). For existing customers, we may use the e-mail address obtained in connection with the sale of goods or services to send commercial communications concerning our own similar goods or services, provided that the customer did not refuse such use when the e-mail address was obtained and has the option to refuse it easily and free of charge in each subsequent commercial communication. We will always request your consent to receive commercial communications where consent is required by the applicable legislation.

4.5.2. Legal basis: Article 6(1) (a) GDPR – the data subject’s consent, or Article 6(1) (f) GDPR – the controller’s legitimate interest in the case of existing customers, to the extent that commercial communications concerning our own similar goods or services are sent, provided that the customer has not refused such communications. The provision of personal data on the basis of consent is voluntary. When sending commercial communications, the controller acts in accordance with Section 116 of Act No. 452/2021 Coll. on Electronic Communications.

4.5.3. Retention period: The retention period of the data is determined by the duration of your consent. You may withdraw your consent at any time by contacting the controller.

4.6. Direct marketing and creation of personalised content and advertising

4.6.1. Purpose: Technologies for creating personalised content and advertising enable us to display our advertisements on partner websites to visitors who have already shown an interest in our websites or services. We aim to ensure that you are shown only advertising that is genuinely of interest to you and not advertising without any connection to you or your

interests. Based on your order history, interests and behaviour on the websites, personalised content and offers may be displayed to you on our websites and on third-party websites and applications (including social networks). This is enabled primarily by cookies. You can find information about managing your preferences regarding the processing of cookies in the cookies section.

4.6.2. Legal basis: Article 6(1) (a) GDPR – the data subject’s consent. The processing of personal data for the purpose of direct marketing and the creation of personalised content and advertising is based on your consent. The provision of personal data on the basis of your consent is voluntary in this case; however, without it, it would not be possible to provide you with personalised content and advertising. The provision of personal data in this case is not a statutory or contractual requirement. You are therefore not obliged to provide us with your personal data for this purpose.

4.6.3. Retention period: The retention period of the data is determined by the duration of your consent. You may withdraw or change your consent to personalised advertising and marketing cookies at any time through the cookie settings available on the website, through your internet browser settings or by contacting the controller.

4.6.4. When processing personal data, basic profiling for marketing purposes may take place, in particular when personalising advertising and content. However, no automated individual decision-making within the meaning of Article 22 GDPR takes place.

4.7. Improving the quality of services provided, analysing traffic to our websites and your behaviour on the websites

4.7.1. Purpose: The development of new services and improvement of existing ones take place through identifying the needs and wishes of users by means of questionnaires, analyses on the websites, interest in certain services and texts, etc. In connection with browsing our websites, we also process information about traffic, the number of pages viewed, the device from which you access our websites, and the time spent on the pages. This data helps us identify less accessible or less comprehensible areas of our websites. We collect this data in order to be able to offer quality content that is user-friendly for you and to develop services in which you are interested. Based on this information, we regularly improve our websites. This data includes the IP address, geographical location of the device, browser type, browser language, date and time of your request, duration of your visit, pages viewed and elements clicked on (for example, links). When collecting and analysing this data, we may use cookies and similar tools on our websites or in e-mail messages.

4.7.2. Legal basis: For technical data necessary to ensure the functionality, security and stability of the website, the legal basis is Article 6(1) (f) GDPR – the controller’s legitimate interest. For analytical, statistical and similar cookies that are not necessary for the operation of the website, the legal basis is Article 6(1) (a) GDPR – the data subject’s consent. The provision of personal data in this case is not a statutory or contractual requirement. You are therefore not obliged to provide us with your personal data for this purpose.

4.7.3. Retention period: The retention period of the data is determined by the duration of your consent. You may withdraw your consent at any time through the cookie settings or by contacting the controller.

4.8. Protection of our rights, property or security, or the rights, property or security of other persons

4.8.1. Purpose: Data concerning how you use our websites or data concerning your orders may be used to prevent or detect fraud, unlawful use of copyrighted works, breaches of our terms and conditions, as well as to comply with decisions of courts or other authorities involved in criminal proceedings, public authorities, or requirements established by applicable legislation.

4.8.2. Legal basis: Article 6(1) (c) GDPR – compliance with a legal obligation, or Article 6(1) (f) GDPR – the controller’s legitimate interest. The processing of personal data for the purpose of protecting our rights, property or security, or the rights, property or security of other persons, is justified by compliance with legal obligations or, as applicable, our legitimate interest in protecting our rights or the rights of other persons. The provision of personal data in this case is not a statutory or contractual requirement. You are therefore not obliged to provide us with your personal data for this purpose.

4.8.3. Retention period: The retention period of the data is 4 years from the termination of our contractual relationships.

4.9. Accounting and tax purposes

4.9.1. Purpose: We must also process your personal data because we are required to do so by the applicable accounting and tax legislation.

4.9.2. Legal basis: Article 6(1) (c) GDPR – compliance with a legal obligation. The processing of personal data for accounting and tax purposes is justified by compliance with legal obligations. We must process this data concerning you.

4.9.3. Retention period: Accounting data are processed for a period of 10 years, and tax documents for a period of 10 years.

4.10. Compliance with other legal obligations

4.10.1. Purpose: Other legal obligations include, for example, obligations in the field of combating the legalisation of proceeds from criminal activity (Act No. 297/2008 Coll. on the Protection against the Legalisation of Proceeds from Criminal Activity and on the Protection against the Financing of Terrorism and on Amendments to Certain Acts).

4.10.2. Legal basis: Article 6(1) (c) GDPR – compliance with a legal obligation. The processing of personal data for the purpose of complying with other legal obligations is justified by compliance with legal obligations. We must process this data concerning you.

4.10.3. Retention period: We generally retain data processed pursuant to the legislation on the legalisation of proceeds from criminal activity for a period of 5 years from the termination of the contractual relationship or from the execution of an occasional transaction outside a business relationship, unless a longer retention period is stipulated or permitted by law, a decision of the competent authority or specific legislation.

5. To whom are personal data disclosed?

5.1. Your personal data are disclosed primarily to our authorised persons and contractual partners who enable us to operate and provide our services. Where our partners process personal data in the capacity of processors, they process them exclusively on the basis of a contract pursuant to Article 28 GDPR. Some recipients may also process personal data as independent controllers where such status arises from legislation or from the nature of the services provided.

5.2. The following categories of our partners (recipients) may have access to your personal data:

5.2.1. partners to whom we provide data for the purpose of analysing traffic to our websites and your behaviour on the websites,

5.2.2. partners who ensure the delivery of consignments,

5.2.3. providers of accounting and tax advisory services,

5.2.4. providers of information and communication services and hosting, including cloud storage,

5.2.5. providers of security and integrity services for our services and websites,

5.2.6. providers of tools for assessing customer satisfaction and customer reviews, in particular operators of services such as Trusted Customers, where used by the controller,

5.2.7. providers of analytical services,

5.2.8. providers of customer support assistance services,

5.2.9. providers of payment gateways (payment card providers),

5.2.10. providers of legal services, solicitors,

5.2.11. public authorities (We disclose personal data in cases of law enforcement, where required by law or necessary for the prevention, detection and prosecution of criminal offences and fraud, or where we are otherwise required to do so by law. This may include a law enforcement authority (Police Force of the Slovak Republic, public prosecutor's office and courts) or financial administration authorities. The transfer of personal data to these recipients does not take place regularly, but only where required by law)

6. Are personal data transferred outside the EU?

6.1. When using certain analytical, marketing or cloud services, personal data may be transferred to third countries, in particular the USA. Such transfers are carried out exclusively in accordance with the GDPR, in particular on the basis of an adequacy decision or standard contractual clauses.

7. How are personal data processed?

7.1. Personal data are processed both manually and automatically. We maintain proper records of all processing activities in accordance with the applicable legislation.

7.2. We take appropriate technical and organisational measures to protect personal data against unauthorised access, loss, misuse, destruction or damage. Access to personal data is limited to authorised persons and contractual partners who need them to perform their duties and who are bound by a duty of confidentiality or contractual obligations relating to the protection of personal data.

8. What are the rights of data subjects?

8.1. When exercising your rights, please contact us using our contact details provided at the beginning of these principles. We reserve the right to verify the identity of the applicant for the rights concerned in an appropriate manner. If requests are repetitive and manifestly unfounded or excessive, we may charge you a reasonable fee or refuse to comply with the requests.

8.2. Right to access personal data

If you wish to know whether we process your personal data, you have the right to obtain information from us as to whether your personal data are being processed and, if so, you also have the right to access your personal data. In the event of a repeated request, we are entitled to charge a reasonable fee for a copy of the personal data provided, based on our administrative costs.

8.3. Right to rectification of inaccurate and completion of incomplete personal data

If you believe that we process inaccurate or incorrect data concerning you, you have the right to request their rectification. You also have the right to have incomplete data completed. We will carry out the rectification or completion without undue delay, always taking into account our technical capabilities.

8.4. Right to erasure

If your personal data are no longer necessary for the purposes for which they were collected or otherwise processed, or if you find that they have been processed unlawfully, you have the right to request their erasure.

8.5. Right to restriction of processing of personal data

If you are not interested in complete erasure, but only in the temporary restriction of the processing of your personal data, you may request us to restrict the processing of your personal data.

8.6. Right to data portability

If you wish us to transfer your personal data to a third party, you may exercise your right to data portability. If exercising this right could result in the rights and freedoms of third parties being adversely affected, we will not be able to comply with your request.

8.7. Right to object

You have the right to object at any time to the processing of personal data processed for the purposes of performing a task carried out in the public interest or in the exercise of official authority, or for the purposes of protecting our legitimate interests. If it cannot be demonstrated that there is a compelling legitimate ground for the processing which overrides your interests or rights and freedoms, we will terminate the processing based on your objection without undue delay.

8.8. Right to withdraw consent at any time

If the processing of your data is based on your consent, you have the right to withdraw your consent at any time.

8.9. Right to lodge a complaint with the Office for Personal Data Protection

You have the right to lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, with its registered office at Budova Park One, Námestie 1. mája 18, 811 06 Bratislava, tel.: +421 232 313 214, e-mail: statny.dozor@pdp.gov.sk.

9. How are cookies processed?

9.1. Cookies are used by most websites and servers when providing a wide range of basic internet services. We use cookies to ensure the functionality of websites, analyse traffic and for marketing purposes.

9.2. Cookies may be divided according to their functions into:

9.2.1. essential, which are necessary for the functionality of our websites,

9.2.2. preference, which enable our websites to remember information that changes how the website behaves or looks (e.g. preferred language or the region where you are located); these cookies are not necessary for the operation of our websites, but they increase their functionality and convenience of use,

9.2.3. analytical, which help us analyse your experience on our websites (the so-called User Experience) and enable us to understand how you use our websites,

9.2.4. remarketing, which we use for proper targeting and personalisation of content and advertising and for analysing and measuring the performance of individual sales channels.

9.3. When visiting the website for the first time, the user is shown a cookie banner through which they may give or refuse consent to the use of individual categories of cookies, with the exception of essential cookies, which are necessary to ensure the functionality of the websites.

9.4. The user may withdraw or change their consent to the use of cookies at any time through the cookie settings available on the websites. Refusal or restriction of the use of certain types of cookies may affect the functionality or availability of certain parts of the websites.

9.5. We use essential cookies because they are necessary to ensure the proper functioning of the website and the provision of a service expressly requested by the user. In relation to the processing of personal data through essential cookies, the legal basis is Article 6(1)(f) GDPR – the controller’s legitimate interest in the proper functioning, security and availability of the website, or, where applicable, Article 6(1)(b) GDPR, where the cookies are necessary for the provision of a service requested by the user. We use preference, analytical, statistical and marketing cookies exclusively on the basis of the user’s prior consent pursuant to Article 6(1)(a) GDPR and Section 109(8) of Act No. 452/2021 Coll. on Electronic Communications.

9.6. When operating the websites, the controller may use services of third parties that store or access cookies on the user’s device, in particular: analytical tools (e.g. Google Analytics) and marketing and advertising tools (e.g. Google Ads, Meta Pixel). When using these services, data may be transferred to third countries, in particular the USA. Such transfers are carried out exclusively in accordance with the GDPR and on the basis of appropriate safeguards for the protection of personal data.

9.7. The specific retention period of individual cookies is stated in the cookie settings or in the cookie banner.

9.8. The user may also control or restrict the use of cookies through their internet browser settings. Most internet browsers allow cookies to be deleted, blocked or the user to be notified of their use.

10. Are data relating to children also processed?

10.1. Our website is not intended for children under the age of 16. We therefore do not knowingly collect their personal data. If we discover that we have inadvertently obtained personal data relating to children under the age of 16, we will take steps to delete such data as soon as possible, except in cases where we are legally required to retain them.

11. Conclusion

11.1. Legislation, as well as our business strategies and the related methods of processing your personal data, may change. If we decide to update these principles, we will publish the changes on our website and inform you of such changes. In cases where these principles are to undergo a significant change, or where we are required to do so by law, we will inform you in advance. We ask you to read these principles carefully and to regularly check these principles when you next visit our website.

Legal regulations:

- Regulation of the European Parliament and of the Council (EU) 2016/679 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
- Act No. 18/2018 Coll. on the Protection of Personal Data

- Act No. 431/2002 Coll. on Accounting, as amended
- Act No. 222/2004 Coll. on Value Added Tax, as amended
- Act No. 108/2024 Coll. on Consumer Protection and on amendments and supplements to certain Acts
- Act No. 452/2021 Coll. on Electronic Communications
- Act No. 297/2008 Coll. on the Prevention of Legalisation of Proceeds of Criminal Activity and on the Prevention of Financing of Terrorism and on amendments and supplements to certain Acts

In Banská Bystrica, on 19 June 2026

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on behalf of Nunofia s.r.o.

Ing. Vladislav Klajban, Managing Director