

PRIVACY POLICY

Below you will find information on the processing of your personal data in connection with the use of our online shop on www.shop.hempoland.eu (the 'Shop') and placing orders via the Shop. We are concerned to ensure protection of your personal data. We use the data only for legitimate purposes as defined in this privacy policy ('Privacy Policy'). The document explains how your data are collected, used, transmitted and disclosed by HemPoland.

Our Privacy Policy contains the following information:

- About us
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All words spelled with first capital letters in this Privacy Policy shall be understood in accordance with their meaning as defined in the Terms and Conditions of our Online Shop available on this website.

About us

The personal data collected through the Shop at www.shop.hempoland.eu are controlled by HemPoland spółka z ograniczoną odpowiedzialnością with its registered office at Władysławowo (82-300 Elbląg), Władysławowo 30A, entered into the Register of Entrepreneurs of the National Court Register in Olsztyn, 8th Commercial Division of the National Court Register under KRS number 0000534517, Business ID (REGON) 360289332, Tax Identification Number (NIP) 5783115991, with share capital of PLN 1,000,000.00 fully paid-up, hereinafter referred to as 'HemPoland' or 'Controller'.

HemPoland is a subsidiary of The Green Organic Dutchman Holdings Ltd. – a company established under Canadian law, having its registered office at: 6205 Airport Road, Building A, Suite 301, Mississauga, Ontario, Canada, listed on the Toronto Stock Exchange.

HemPoland is a manufacturer and distributor of the highest quality fibrous hemp products containing natural phytocannabinoids, such as food supplements and cosmetics and the owner of CannabiGold brand.

How we handle your data

Our priority is to ensure the security of your personal data and make every effort to protect them. In particular, we ensure that the data are:

- processed for our Customers lawfully, fairly and transparently;
- collected in specific, explicit and legitimate purposes and not processed further in a way that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary for the purposes for which they are processed;
- accurate and updated, if necessary;
- stored in a manner that enables the identification of our Customers for a period that is not longer than is necessary, for the purposes for which such data are processed;
- processed in such a way as to ensure adequate security of personal data, including protection against unauthorised or unlawful processing and accidental loss, destruction or damage, by appropriate technical or organisational measures.

Legal basis for the processing of your personal data

We process your personal data in accordance with the regulations governing the processing of personal data, including in particular 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) (Official Journal of the European Union No. 119, p. 1), hereinafter referred to as the 'GDPR' and the Act of 10 May 2018 on the Protection of Personal Data (consolidated text of the Journal of Laws of 2019, item 1781).

The legal basis for the processing of your personal data is as follows:

- performance of the contract or taking action at your request prior to the conclusion of the contract. On this basis, your data are processed in particular for the purpose of: placing an order, making payments, providing you with products and enabling them to be returned (Article 6(1)(b) of the GDPR);
- processing is necessary for the purposes arising from legitimate interests pursued by the Controller, to which the rights that you are entitled to are not superior. On this basis, your data are processed in particular: for the purpose of developing our business and improving the satisfaction of our Customers, for direct marketing purposes, as well as for our analytical and statistical purposes and for establishing, pursuing or defending against claims (Article 6(1)(f) of the GDPR);

- Your consent to the processing of personal data. Please note that when your data are processed on this basis you have the right to withdraw your consent at any time;
- the processing of data is necessary to fulfil the legal obligation to which we are subjected, for example, the obligations under tax law (Article 6(1)(c) of the GDPR).

Purposes and legal grounds for the processing of your personal data and types of personal data subject to processing

Purposes of processing	Legal basis for processing	Types of personal data subject to processing
execution of the contract and taking action at your request prior to the conclusion of the contract, including: creating an Account, payment, delivery, returns, claims under the warranty	Article 6(1)(b) of the GDPR (execution of the contract)	name, surname, address, delivery address, e-mail address, telephone number, payment information, order details, order history, payment history, click and view (in connection with cookies)
direct marketing; we will recommend our products via e-mail or text messages and inform you of discounts and offers that may be of interest to you	Article 6(1)(f) of the GDPR (legitimate interests pursued by the Controller – keeping and developing economic activity)	first name, surname, e-mail address, information about products and offers that have been clicked
administration, development, protection of our business and improvement of our services and products	Article 6(1)(f) of the GDPR (legitimate interests pursued by the Controller- keeping and developing economic activity, improvements to products)	order history, delivery information, payment details, click and view (in connection with cookies)
analysing Customers' traffic on our website in order to improve our website, products and relations with Customers and to display advertisements of our products and adjust their content to the Customers' preferences; all data used for these purposes are pseudonymised	Article 6(1)(f) of the GDPR (legitimate interests pursued by the Controller – keeping and developing economic activity, improving our products and website)	details of your device, IP address, type and version of the browser, location, operating system, information about your activity in our Shop, such as the manner of using it, searched products

fulfilling legal obligations resulting from the regulations, for example tax and accounting obligations	Article 6(1)(c) of the GDPR (compliance with the legal obligation)	first name, surname, address, payment information and contract details
pursuing claims and defending against claims	Article 6(1)(f) of the GDPR (legitimate interests pursued by the Controller – defence of the Controller’s interests)	first name, surname, address, payment information, details of the order

Profiling

We can use profiling in our Shop. Profiling involves automated processing of personal data in order to assess certain aspects of our Customers. We can use profiling for marketing purposes. This allows us to better understand your preferences regarding our products and adjust our offer to your needs. This does not have any legal effect on you and does not affect your situation. We do not use any other automated individual decisions. Making decisions based on profiling is permitted where the person has given explicit consent (which may be withdrawn at any time) is legally authorised or necessary for the conclusion or performance of the contract.

Retention period of personal data

Your personal data will only be stored for a limited period of time and only to the extent necessary for the purposes for which it was provided.

The personal data processed for the purpose of concluding and performing the agreement shall be kept as long as this agreement is in force and after its expiry for the period necessary to secure or pursue claims and to fulfil all legal obligations (e.g. resulting from the provisions of tax law).

Personal data processed for the purpose of fulfilling our legal obligations or the fulfilment of our legitimate interests will be stored as long as the law requires us to process them.

If your personal data is processed on the basis of your consent, they may be stored until you withdraw your consent or object to the processing of the data or until they are no longer necessary for the purpose for which the consent was granted. After this period, your data will be stored until the expiry of the limitation period for possible claims.

Categories of your personal data recipients

Your trust is a key issue for us. We do not sell any personal data to any third parties. However, in order to provide you with our products and services, and to conduct our business, we can disclose to and share your data with the following categories of recipients:

- business partners who support us in conducting our business, such as:

- providers of technical services whom we entrust with the provision of IT systems, software and hosting of our website;
- enterprises that enable the performance of your order, such as: online payment service providers, courier companies, warehouses;
- the bank that maintains our bank account;
- companies that provide marketing and advertising services;
- enterprises that provide services related to sending e-mails, text messages and postal items on our behalf,
- our advisors, including lawyers, accountants, auditors who provide professional services to us,
- authorities, if we are obliged to disclose your personal data in order to comply with all legal regulations,
- our parent company The Green Organic Dutchman Holdings Ltd.

Please note that many of the entities that receive data have an independent right or obligation to process your personal data. Therefore, we recommend that you read the privacy policies of these entities.

Transfer of personal data to recipients from third countries

Personal data collected by us may be transferred and stored in countries outside the European Economic Area ('EEA'). This is usually the case when the entity that cooperates with us provides its services outside the EEA. Any such transfer of your personal data shall be made in accordance with applicable laws. You have the right to receive a copy of your personal data transferred to a third country. We will ensure an adequate level of protection for your personal data. This may also include the application of standard contractual clauses concerning the transfer of personal data, adopted by the European Commission, which ensure adequate protection of personal data.

As mentioned above, we are part of an international capital group, the parent company of which is The Green Organic Dutchman Holdings Ltd. with its registered office in Canada. Therefore, your data may be transferred to Canada. The European Commission concluded that Canada is considered to be a country that ensures an adequate level of protection of personal data transferred from the EU (Commission Decision of 20 December 2001, No 2002/2/EC).

Your rights

Under the provisions on the protection of personal data and the restrictions indicated therein, you have the following rights:

- **the right to access your personal data** - you have the right to access your personal data and to receive copies of your personal data stored by us, as well as detailed information about the manner of their processing;
- **the right to rectify your personal data** – you have the right to rectify your personal data if they are inaccurate or incomplete;

- **the right to delete your personal data (the right to be forgotten)** – you have the right to request us to delete your personal data if there is no reason for their further processing. However, we cannot always remove your personal data completely, for example when they are still needed to fulfil legal obligations or to deal with claims. You will be notified of such a situation in response to your request;
- **the right to restrict the processing of your personal data** – entitles you to request restriction of the processing of personal data in certain situations, for example when you have questioned the accuracy of your personal data or objected to the processing of your data by us; this restriction shall be valid for a period that enables the Controller to verify the correctness of personal data;
- **the right to transfer the data** – you have the right to receive a digital copy of your personal data. You also have the right to request that your personal data be transferred to another data controller. This right shall be limited to situations where the processing of data takes place in an automated manner and relates to personal data processed on the basis of the user's consent or under a contract;
- **the right to object to the processing of your personal data** - you have the right to object to the processing of your personal data at any time, for reasons related to your particular situation. In such a case, we are no longer entitled to process your personal data unless we demonstrate the existence of valid legitimate grounds for processing which are superior to your interests, rights and freedoms or grounds for establishing, pursuing or defending against claims. You also have the right to object to the processing of your personal data for direct marketing purposes;
- **the right not to be subject to a decision based solely on automated processing, including profiling** – you have the right to require us to intervene if a decision based on profiling produces legal effects for you or affects you in a similarly significant way;
- **the right to lodge a complaint** - in the case of any complaints concerning the manner of processing your data by us, you have the right to lodge a complaint with the supervisory authority. In Poland, the competent authority is the President of the Office for the Protection of Personal Data.

We will respond to your requests without undue delay, within one month of the date of its receipt at the latest. If necessary, that period may be extended by two consecutive months, taking into account the complexity and number of applications. We will notify you of any such extension within one month of receiving your request together with the reasons for the delay.

Refusal to provide personal data

Providing personal data in our Shop is voluntary, but it is necessary for the use of most of the functionalities in our Shop, in particular for placing an order and performing the contract. A failure to provide personal data may result in the inability to perform most of the activities on our website.

Cookies and other technologies

Our website, like most other websites, makes use of cookies. Cookies are small files with information that allows our website to recognise the user's device, and are downloaded to the user's device during his visit on our website, if the user consents to it. Cookies are then sent back to our website at each subsequent visit or to another page that recognizes these files.

It is possible to obtain and store information using cookies on the basis of your consent. During the first visit to our website, we provide you with information about the use of cookies and we ask you to accept them.

The use of cookies makes website navigation much easier, more pleasant and the website content is better adapted to the expectations and preferences of their users.

Cookies are used for the following purposes:

- to adapt the content of our website to your preferences and optimise the use of our website;
- to identify the user devices and maintain the session after the user logs in,
- to create statistics that will enable us to develop our Shop and products and to better understand the needs of our Customers
- to display advertisements of our products and adjust their content to our Customers' preferences.

Our website uses two basic types of cookies: session cookies and persistent cookies.

Session cookies are temporary files that are stored on the user's device until the user logs out or the session completes.

Persistent cookies are stored on the user's device for a period specified in the file parameters or until they are removed. This means that the information from them will be transferred to the server whenever the user visits the Shop.

Apart from cookies that belong to our domain, our website can also use cookies of third parties. This is due to the fact that third parties make available to us certain functions that are necessary for the proper functioning of our website. We make use of the services of the following companies that use cookies on our website:

- Google Analytics
- MailChimp

Web browsers generally enable cookies to be saved on the user's device by default. You can manage cookies at any time, including blocking and deleting them, using your privacy settings on our website or your browser. You may also block only cookies of third parties while accepting cookies used directly by the Controller. Please note that disabling or limiting the use of cookies may cause difficulties in the use of our website and affect some of the available functions.

Google Analytics

We use Google Analytics to analyse the manner in which our website is used. Google collects information about your location (based on your IP address) and your behaviour when accessing

our website (on the basis of cookies) by using the above-mentioned tool on our website. Google Analytics generates statistical data and other information about the use of our website by means of analytical cookie files. This solution enables us to better understand the needs of our Customers and adapt our offer to these needs. You can opt out of Google Analytics by installing an add-on to the web browser available at <https://tools.google.com/dlpage/gaoptout?hl=pl>.

Social media plug-ins

Our Shop uses Facebook and Instagram. These plug-ins connect you directly to our social media profiles. In order to obtain more detailed information, we recommend that you read the privacy policy of each of the social media. Please note that we are not responsible for these policies.

Changes to the Privacy Policy

This version of the Policy shall be effective as of 1 January 2021.

This Privacy Policy may be amended as appropriate, for example in order to adapt to the new requirements imposed by applicable law, in particular taking into account the protection of personal data or consumer rights or because of technical requirements. We will inform you of any changes to this Privacy Policy on our website.

Contact details

We are happy to answer all your questions regarding your personal data and your requests for more detailed information about our Privacy Policy.

Our Clients may also contact our Personal Data Protection Officer at the following e-mail address: iod@hempoland.eu

You can contact us as follows:

- by traditional mail:
Wladyslawowo 30A, 82-300 Elblag
- by phone:
+48 668 696 368
- by email
info@hempoland.eu