

Privacy Policy



T R E N A

Warsaw, November 2025

This **Privacy Policy** sets out the rules for processing the data of Users of the website available at www.trena.pl and www.gabona.com and related services, including the Online Store, the B2B Platform and the Newsletter, in particular personal data, as well as the rules for the use by the Service Provider of these services of data entered into Users' end devices, commonly known as cookies.

I. Definitions

1. The terms used below mean:

1) Data Controllers:

- Trena Sp. z o.o, ul. Świeradowska 47, 02 - 662 Warsaw,
- GABONA sp. z o.o., ul. Świeradowska 47, 02-662 Warsaw;

- 2) Cookies - IT data, in particular small text files, saved and stored on end devices, which can be read each time the device connects to the Website, used to enable or facilitate Users' access to and use of the Website;
- 3) Personal Data - any information relating to an identified or identifiable natural person within the meaning of Article 4(1) of Regulation 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 EU, L series, No. 119, 4 May 2016, pp. 1–88);
- 4) Account – a service provided in accordance with the Terms and Conditions of the Online Store and B2B Platform, available at any time via the link entitled "Terms and Conditions" located at the bottom of each subpage of the Online Store and B2B Platform;
- 5) Newsletter – a service provided on the Website in accordance with the Terms and Conditions available at any time via the link entitled "Terms and Conditions" located at the bottom of each subpage of the Online Store and B2B Platform;
- 6) PKE – Act of 12 July 2024 on Electronic Communications Law;
- 7) Online Store, B2B Platforms – a service provided on the Website in accordance with the Terms and Conditions of the Online Store and B2B Platforms, available at any time via the link entitled "Terms and Conditions" located at the bottom of each subpage of the Website;
- 8) Parties – Data Controller and User;
- 9) Website – a set of services of variable composition provided electronically using an IT tool connected to the Internet, in accordance with these Terms and Conditions and the terms and conditions of other services provided on the Website at www.trena.pl

and www.gabona.com, as well as through links from other areas of the Internet, such as, among others, the Online Store and B2B Platform services;

10) End device – an electronic device, such as, in particular, a computer set or mobile phone through which the User accesses the Website;

11) User – any person who uses the Website in any way, including, among others, as a Customer of the Online Store or the B2B Platform.

II. General rules for data processing

1. Data Controllers fully respect the right to privacy, including the right of Users to self-determination with regard to personal data concerning each of them. The Service Provider's goal is to ensure the highest possible satisfaction of the User in using the Website and the services provided therein, with the least possible interference in their privacy, and this goal is served by the processing of personal data by the Data Controllers, the detailed rules of which are set out in this document.
2. Data Administrators process data made available to them directly and independently by Users on the Website on the basis of regulations, including the Terms and Conditions of the Online Store and the B2B Platform, which, depending on their nature, constitute personal data or data that is not of a personal nature. The data provided to the Website by the User and processed by the Data Controllers is kept confidential and protected against unauthorised access by third parties in accordance with the aforementioned Terms and Conditions and mandatory provisions of law, regardless of its nature.
3. The Data Controllers of the data provided by Users to the Website are:
 - 1) Trena Sp. z o.o, ul. Świeradowska 47, 02 - 662 Warsaw,
 - 2) GABONA sp. z o.o., ul. Świeradowska 47, 02-662 Warsaw;
4. The Data Controllers have appointed a Data Protection Officer who can be contacted in all matters relating to personal data protection by writing to the email addressiod@m3mcom.pl or by writing to the postal address indicated in point II(3) above;
5. Personal Data obtained by the Data Controllers is processed in accordance with the provisions on personal data protection, in particular 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) and Polish regulations issued in connection with the GDPR, including the provisions of the Act of 10 May 2018 on the protection of personal data. Data Controllers keep Personal Data confidential and protect it from unauthorised access by third parties in accordance with the rules set out in the above-mentioned legal acts.

6. As part of their activities, Data Controllers collect and process Personal Data on the following legal bases:
- 1) on the basis of the consent of the data subject for the purpose of sending marketing messages and commercial information via remote electronic communication channels, in particular e-mail, telephone, SMS, MMS (legal basis: Article 6(1)(a) of the GDPR);
 - 2) for the purpose of performing contracts concluded by Data Controllers with Users for the provision of services on the Website and contracts for the sale of products via the Online Store and the B2B Platform, as well as with IT service providers responsible for maintaining the Website and other entities performing activities in the performance of these contracts (legal basis: Article 6(1)(b) of the GDPR);
 - 3) in order to fulfil the legal obligations incumbent on Data Controllers resulting from their activities and to manage relations with Users (legal basis: Article 6(1)(c) of the GDPR);
 - 4) on the basis of the legitimate interest of Data Controllers in establishing, protecting and pursuing potential civil, criminal or administrative liability by Data Controllers and Users (legal basis: Article 6(1)(f) of the GDPR);
 - 5) based on the consent of the data subject for the purpose of sending, via remote electronic communication channels, in particular e-mail, telephone, SMS, MMS, marketing messages and commercial information relating to the advertising and promotion of products offered by Data Controllers (legal basis: Article 398 of the PKE).
7. Notwithstanding the legal bases listed in point II(6) above, Data Controllers may process Users' Personal Data for the purposes of implementing loyalty programmes, competitions and other similar forms of marketing of goods and services carried out from time to time by themselves on the basis of the legitimate interest of Data Controllers (legal basis: Article 6(1)(f) of the GDPR) or in cooperation with other entities, after informing Users about them, inviting them to participate and obtaining their consent to the processing of their personal data for this purpose.
8. The processing of Users' personal data is voluntary, however, depending on the circumstances, the User's refusal to provide such data to the Data Controllers or a request to delete it may prevent the Data Controllers from performing the service, delivering the Products or contacting the User. In such cases, the User is obliged to provide the Data Controllers, acting in their own interest, with the necessary data, minimum data, and at the same time data that is true, formally correct, complete and adequate to the situation.
9. The User may voluntarily, in accordance with their own informed, specific and unambiguous decision, by asking a question via the contact form or by sending a message to the Data Controllers, provide additional data in order to enable the Data Controllers to select appropriate marketing or commercial information that may be of particular interest to the User.

10. As part of the "Newsletter" service provided by the Data Controllers to Users, the User voluntarily, in accordance with their own conscious, specific and unambiguous decision, provides the Data Controllers with their e-mail address, thereby expressing their consent to receive the Newsletter from the Data Controllers.
11. The User may unsubscribe from the Newsletter service at any time by using the deactivation link at the end of each message sent or by writing a message to the contact details indicated in point II, section 20.
12. In accordance with the rules set out in the provisions of law on the protection of personal data and within the scope provided for therein, each User has the right to access their personal data, the right to rectify/correct, delete or restrict the processing of such data, the right to transfer such data, and the right to withdraw consent at any time without affecting the lawfulness of the processing carried out on the basis of consent prior to its withdrawal.
13. The User has the right to lodge a complaint with the President of the Personal Data Protection Office regarding the processing of their personal data by the Data Controllers.
14. Personal Data will be processed no longer than, respectively, until the objectives pursued by the Data Controllers are achieved, i.e. until the contract with the User is terminated, and then until the expiry of the limitation periods related to the contract to which the processing of Personal Data is related, or related to the expiry of obligations under the law, or until the withdrawal of consent to the processing of personal data, in cases where such consent has been given.
15. Users' Personal Data is processed by Data Controllers, but may also be entrusted to entities with which Data Controllers have concluded Personal Data processing agreements. These may include, in particular:
 - 1) hosting service providers, i.e. those who store the Website data and ensure its operation;
 - 2) providers of tools for analysing Website traffic, conducting marketing activities on the Website and sending the Newsletter;
 - 3) in the case of Users making purchases using the Online Store and the B2B Platform, depending on the purchase model selected by the User:
 - postal and courier service operators selected by Users to deliver orders from the Online Store and B2B Platform,
 - payment system operators selected by Users,
 - entities sending e-mails related to the delivery of Orders.
16. Users' Personal Data may also be made available to external entities authorised to receive such data on the basis of currently applicable law.

17. Users' Personal Data will not be transferred outside the European Union, nor will it be transferred to international organisations.
18. Users' behaviour on the Website and their purchasing preferences are analysed in order to adapt the services and products available on the Website to the actual, time-varying needs of Users. In accordance with the messages appearing on the Website, the User may object to such use of their data at any time.
19. Users' Personal Data is not subject to automated processing that has any legal consequences for Users, nor is it profiled.
20. Data Controllers can be contacted:
 - 1) by post at the following address:
 - Trena Sp. z o.o, ul. Świeradowska 47, 02 - 662 Warsaw,
 - GABONA sp. z o.o., ul. Świeradowska 47, 02-662 Warsaw;
 - 2) by email at: iod@m3mcom.pl,
 - 3) using the form available at any time via the link entitled "Contact form/Contact" located at the bottom of each subpage of the Website.

III. Cookies

1. The cookies used by the Data Controllers are safe for Users' end devices; in particular, it is not possible for viruses or other unwanted software or data to enter end devices in this way. These files allow the identification of the software used by Users and the adaptation of the Website, within the limits of the technical possibilities available in this regard, to the individual needs of each User. Cookies usually contain information about the domain name from which they originate, the time they are stored on the Device and the assigned values of other data.
2. Data Administrators use two types of cookies:
 - 1) session cookies: these are stored on the end device and remain there until the end of the browser session, when they are permanently deleted from the device's memory. The mechanism of session cookies does not allow the collection of any personal data or confidential information from the end device;
 - 2) Persistent cookies: these are stored on the end device and remain there until they are deleted. Ending a browser session or switching off the end device does not delete them from the device. The mechanism of persistent cookies does not allow the collection of any personal data or confidential information from the end device.

3. Each User may restrict or even disable the ability to place cookies on their end device, except for the functionalities of the Website which, by their nature, require the use of cookies.
4. Data Administrators use their own cookies for the following purposes:
 - 1) Website configuration - in particular, to adapt the content of the Website to the User's preferences; optimising the display of these pages to suit the User's individual needs; remembering the settings selected by the User and personalising their interface, e.g. in terms of the selected language or place of residence, remembering the history of pages visited on the Website, font size, page settings, etc.;
 - 2) authenticating and maintaining the User's session on the Website - in particular, maintaining the Website User's session (after logging in), thanks to which they do not have to re-enter their login and password on every subpage of the Website;
 - 3) carrying out processes necessary to ensure the full functionality of the Website pages - in particular, adapting the content of the pages to the User's preferences and optimising the use of these pages of the Website;
 - 4) remembering the User's location – to ensure the correct configuration of selected Website functions, in particular to adapt the information provided to the User to their place of residence;
 - 5) analyses, research and audience audits – in order to create anonymous statistics that help to understand how Users use the Website's web pages, which enables continuous improvement of the Website's architecture and content;
 - 6) ensuring the security and reliability of the Website – in particular to ensure that certain information is processed in a manner appropriate to the purpose for which it was collected.
5. Each User may independently and at any time change their web browser settings regarding cookies, specifying the conditions for their storage and access to the end device. These settings can be changed in particular to block the automatic handling of cookies in the web browser settings or to inform the User each time cookies are placed on the end device. Detailed information about the possibilities and ways of handling cookies is available in the software (web browser) settings.
6. The user may delete cookies from the end device at any time using the available functions of the web browser they use.

IV. Final provisions

1. The Privacy Policy is effective from 01.11.2025.