

Privacy and Cookie Policy

twisty.world website

EFFECTIVE FROM 14 OCTOBER 2026

VERSION 2.0

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1 General provisions

This Privacy and Cookie Policy (the "Policy") explains how we process the personal data of visitors to the website available at **twisty.world**, including all of its language versions (the "Website"), and how the Website uses cookies and similar technologies.

This Policy fulfils the information obligations under Articles 13 and 14 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 (the "GDPR") and, for visitors in the United Kingdom, under the corresponding provisions of the UK GDPR. References in this Policy to articles of the GDPR also refer to the corresponding articles of the UK GDPR.

The Website is informational and presents products of the Twisty brand. We do not sell anything through the Website – you cannot create an account, place an order or make a payment on it, and the Website contains no forms. Twisty products can be bought in the shops linked from the Website: in the Nutridome online shop (run by the Controller under a separate privacy policy available in that shop) and in the shops of other retailers, who process their customers' data as separate controllers.

2 Data controller

The controller of your personal data is:

Abriga spółka z ograniczoną odpowiedzialnością (a Polish limited liability company)
ul. Staromiejska 8/12, 26-600 Radom, Polska
entered in the register of entrepreneurs of the National Court Register (KRS) kept by the Sąd Rejonowy Lublin-Wschód w Lublinie z siedzibą w Świdniku, VI Wydział Gospodarczy Krajowego Rejestru Sądowego (District Court Lublin-Wschód in Lublin, seated in Świdnik, 6th Commercial Division of the National Court Register), under KRS number 0000700689
NIP 5272825059 · REGON 368588548 · share capital 100 000,00 zł

(the "Controller", "we" or "us").

For any matters relating to the protection of personal data, you can contact us:

- by e-mail: **contact@twisty.world**,
- by phone: **+48 22 266 10 01**,
- in writing, at the Controller's registered office address given above.

The Controller has not appointed a data protection officer.

3 What data we process, for what purposes and on what legal basis

The data we process depends on how you use the Website. Below we describe every situation in which data is processed.

3.1 Displaying the Website and keeping it secure

Each time you connect to the Website, the server automatically records technical data: your IP address, the date and time of the request, the address of the page viewed, the address of the page you came from (the "referrer"), information about your browser and operating system, and the server response code.

Purpose	making the Website available, ensuring that it works properly and securely, and protecting it against abuse and attacks
Legal basis	Article 6(1)(f) GDPR – our legitimate interest in making the Website available and keeping it secure
Retention period	for a short period within the hosting provider's infrastructure, only to the extent necessary for technical and security purposes

We do not combine this data with other data and do not use it to identify visitors to the Website.

3.2 Choosing the language version

On your first visit, the Website determines from your IP address the country you are connecting from and directs you to the appropriate language version. The country is determined automatically at the time of connection and is not stored by us. We remember the language version you choose in the `twisty_locale` cookie, so that on later visits the Website is shown in the same language. You can change the language version at any time using the switcher in the Website footer.

Purpose	displaying the Website in a language the visitor understands
Legal basis	Article 6(1)(f) GDPR – our legitimate interest in providing content in the appropriate language; the cookie is strictly necessary to provide this function and does not require consent
Retention period	cookie – 12 months from when it was last saved

3.3 Haircare quiz

Your quiz answers and results are saved only in your browser's storage (the localStorage mechanism, key `twisty_quiz_results`), so that the results can be shown again when you return to the quiz. The answers are not sent to the Controller or to any third party, and we have no access to them. You can delete them at any time by starting the quiz again or by clearing your browser data.

3.4 Visit statistics – Google Analytics

Only with your consent do we use the Google Analytics 4 service to understand how the Website is used and to improve it. Until you give your consent, this tool is not loaded at all.

The following are processed as part of this service: a pseudonymous identifier stored in cookies, information about your device, browser and operating system, approximate location (country, region, city) derived from your IP address, the pages visited, the duration and course of the visit, the traffic source, and interactions with elements of the Website. Google Analytics 4 does not log or store IP addresses.

Purpose	compiling visit statistics and analysing use of the Website
Legal basis	Article 6(1)(a) GDPR – your consent; consent to the storing of cookies in accordance with regulation 6 of the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR) in the United Kingdom and, in the European Union, the national rules implementing Article 5(3) of Directive 2002/58/EC (the ePrivacy Directive), including Article 399 of the Polish Electronic Communications Law of 12 July 2024
Retention period	cookies – up to 13 months; data in Google Analytics – no longer than 14 months; in any case until you withdraw your consent

3.5 Google advertising features

Only with your separate consent to marketing cookies do we allow Google to use data collected in Google Analytics for advertising purposes, including building advertising audience lists (remarketing) and personalising ads (Google Signals features). If you are signed in to a Google account, Google may link this data with information from your account in accordance with its privacy policy and your account settings. To this extent, Google may process the data as a separate controller.

Purpose	carrying out advertising activities and reaching people interested in the Twisty brand with ads
Legal basis	Article 6(1)(a) GDPR – your consent; consent to the storing of cookies in accordance with regulation 6 PECR (United Kingdom) and the national rules implementing Article 5(3) of the ePrivacy Directive (European Union)
Retention period	until you withdraw your consent, and no longer than the period stated for Google Analytics data

These activities may involve profiling, that is, the automated assessment of your interests based on your activity on the Website in order to tailor ads. We do not take decisions about you based solely on automated processing that produce legal effects concerning you or similarly significantly affect you.

3.6 Contacting us by e-mail

If you write to us, we process your e-mail address, your name (if you give it), the content of your message and any other data you choose to provide.

Purpose	replying to you and handling the correspondence
Legal basis	Article 6(1)(f) GDPR – our legitimate interest in replying to messages sent to us
Retention period	until the matter is closed and, where the correspondence may be relevant to possible claims, until the limitation period for those claims expires

3.7 Legal obligations and claims

We may also process data to comply with legal obligations, in particular those relating to handling requests concerning the protection of personal data (Article 6(1)(c) GDPR), and to establish, exercise or defend legal claims (Article 6(1)(f) GDPR) – for the period required by law or until the limitation period for claims expires.

3.8 Brand profiles on social media

The Website contains only links to the Twisty brand profiles on Facebook, Instagram and TikTok. We do not embed plug-ins from these services in the Website, so simply visiting the Website does not send your data to them. Once you go to a profile, your data is processed by the operator of the social network concerned under the terms of its privacy policy. As regards statistical data about visits to our profiles, we may be a joint controller together with the operator of the service.

4 Cookies and similar technologies

Cookies are small text files saved on your device by your browser. The localStorage mechanism, which allows data to be saved in the browser's storage, works in a similar way. We use them in the following categories:

- **Essential** – required for the Website to work and to provide the functions you use; they do not require consent,
- **Statistics** – used to compile visit statistics; saved only with your consent,
- **Marketing** – allow data to be used for advertising purposes; saved only with your consent.

NAME	PROVIDER	PURPOSE	CATEGORY	DURATION
twisty_locale	Website (cookie)	remembering the language version you chose	Essential	12 months
twisty_consent	Website (localStorage)	remembering your cookie choices	Essential	12 months
twisty_quiz_results	Website (localStorage)	showing your quiz results on your device	Essential	until you delete it
_ga	Google (cookie)	distinguishing users for statistics	Statistics	up to 13 months
_ga_QVJWN7JQYR	Google (cookie)	maintaining session state for statistics	Statistics	up to 13 months

If you consent to marketing cookies, Google may also use its own cookies on its domains (e.g. google.com, doubleclick.net) under the terms described in Google's privacy policy.

4.1 Managing your consent

On your first visit we show a banner in which you can accept all categories of cookies, reject all categories that are not essential, or choose individual categories in the settings. Closing the banner with the "x" button means rejecting all cookies other than essential ones. Refusing is as easy as accepting and does not limit your access to the content of the Website.

You can change or withdraw your consent at any time using the **"Cookie settings"** link in the Website footer. Withdrawing consent does not affect the lawfulness of processing carried out on the basis of that consent before its withdrawal; once you withdraw consent, the Google Analytics cookies are deleted from your device. Your choice is remembered for 12 months, after which we will ask for your consent again.

You can also delete and block cookies in your browser settings. Blocking essential cookies may cause some functions of the Website, such as remembering your language version, not to work properly.

5 Recipients of data

Data may be disclosed to entities that process it on our behalf under data processing agreements (processors), to the extent necessary for them to provide their services:

- **Cloudflare, Inc.** (101 Townsend St., San Francisco, CA 94107, USA) – hosting of the Website, content delivery network, file storage and protection against attacks,
- **Google Ireland Limited** (Gordon House, Barrow Street, Dublin 4, Ireland) – the Google Analytics service, only after you have given your consent,
- e-mail service providers and entities providing IT and advisory services to us.

If you consent to marketing cookies, data from Google Analytics is also shared with **Google Ireland Limited** as a separate controller, to the extent of the advertising features described in the "Google advertising features" section.

Data may also be disclosed to public authorities where the law requires it. We do not sell personal data.

6 Transfers of data outside the European Economic Area

Using the services of Cloudflare and Google may involve transferring data to the United States of America, including to Google LLC. Such transfers are based on the European Commission's decision of 10 July 2023 finding an adequate level of protection of personal data under the EU-US Data Privacy Framework, in which Cloudflare, Inc. and Google LLC participate, and, additionally, on the standard contractual clauses adopted by the European Commission. Transfers of data from the United Kingdom to the United States are based on the UK Extension to the EU-US Data Privacy Framework (the "UK-US data bridge"), where the recipient participates in it, and, additionally, on the UK International Data Transfer Agreement (IDTA) or on the standard contractual clauses together with the UK International Data Transfer Addendum (the "UK Addendum"). You can obtain a copy of the safeguards used by contacting us.

7 Your rights

In connection with the processing of your personal data, you have the right to:

- access your data and receive a copy of it (Article 15 GDPR),
- rectification of your data (Article 16 GDPR),
- erasure of your data (Article 17 GDPR),
- restriction of processing (Article 18 GDPR),
- data portability (Article 20 GDPR),
- object, on grounds relating to your particular situation, to processing based on our legitimate interest (Article 21 GDPR),
- withdraw your consent at any time, without affecting the lawfulness of processing carried out before its withdrawal (Article 7(3) GDPR).

To exercise these rights, contact us as described in the "Data controller" section. We will reply without undue delay and in any event within one month of receiving your request; where justified, this period may be extended by a further two months, in which case we will let you know.

You also have the right to lodge a complaint with a supervisory authority if you believe that the processing of your data infringes data protection law. Our lead supervisory authority is the Polish **President of the Personal Data Protection Office** (Prezes Urzędu Ochrony Danych Osobowych, UODO), ul. Stawki 2, 00-193 Warszawa, Polska, www.uodo.gov.pl. Under Article 77 GDPR, you may also lodge a complaint with the supervisory authority of the EU Member State of your habitual residence, place of work or place of the alleged infringement.

If you are in the United Kingdom, you can complain to the UK supervisory authority, the **Information Commission** (formerly the Information Commissioner's Office, ICO), www.ico.org.uk.

You also have the right to an effective judicial remedy against us, including by bringing proceedings before the courts (Article 79 GDPR and UK GDPR).

8 Providing data is voluntary

You do not need to provide any personal data to use the Website. Providing data in e-mail correspondence is voluntary, but necessary for us to reply to your message. Consent to statistics and marketing cookies is voluntary, and not giving it does not limit your access to the content of the Website.

9 Data security

We use appropriate technical and organisational measures to protect data against unauthorised access, loss, destruction or alteration. The connection to the Website is encrypted (HTTPS), only authorised persons have access to data, and processors acting on our behalf are contractually bound to protect it.

10 Legal basis of this Policy

This Policy has been prepared in particular on the basis of the following legislation:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR),
- for the United Kingdom: the UK GDPR and the Data Protection Act 2018,
- for the United Kingdom: the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR), in particular regulation 6,
- as the Controller is established in Poland, Polish law also applies to it, in particular the Act of 10 May 2018 on the Protection of Personal Data, the Electronic Communications Law of 12 July 2004 (in particular Article 399) and the Act of 18 July 2002 on Providing Services by Electronic Means.

11 Changes to this Policy

This Policy may be updated, in particular following changes in the law or in the way the Website works. The current version is always available on the Website, and the date from which it applies is shown at the top. If there are significant changes to processing based on consent, we will ask for your consent again.