# **Privacy policy**

Thank you for your interest in our website. The protection of your personal information is very important to us. In the following we would like to give you a comprehensive overview about our standards concerning protection, collection, storage, processing and use of personal data.

## **Browsing the website**

It is not required to give personal information in case of simple access to our website. For this purpose we only collect and use data without personal relatedness [such as your internet service provider, the website from which you came to our website or the name of the requested file]. This data is only analysed in order to improve our offering and cannot be used to connect to your person.

In addition we keep a log of the IP-address of the requesting computer until the protocol file is automatically deleted. The IP-address will only be analysed in case of an attack on our network infrastructure.

### Registering on the website

When you register on our website we collect your email address and the password you chose. The collection of this data allows us to grant you access to the shopping community, to open a customer account and to contact you in the case a call back is needed.

### Buying a product

When you consider buying a product on our website, we will need some data to process your order. The following data is essentially required:

- first name and surname;
- address (street name, house number, ZIP-code, town);
- country;
- phone number.

Any information further than this is voluntary.

## **Using Paypal**

The personal data collected by us include:

- account number;
- bank sorting code.

We use the personal data provided by you only if it is necessary for the execution of your order. As soon as the contract is completely carried through and full payment is received the usage of your data will be stopped and the data will be deleted after the storage period according to tax and commercial law has expired, unless you consented to the further usage of your data.

#### Subscribing for a newsletter

Your email address will be used to send you newsletters on a regular basis if you expressly consented to this usage or if you subscribed to the newsletter. You can unsubscribe at any time using a link which you can find at the end of each newsletter or by sending an email to support@sottoluce.com.

#### **Data security**

We protect your personal information by the use of appropriate technical and organisational security measures against any incidental or deliberate manipulation, complete or partial loss, destruction or access by unauthorized persons. Our security measures are continuously improved according to technological advances. All data is transferred applying AES-256 SSL encryption.

#### Use of cookies

In order to make visiting our website pleasant and to enable you to use certain features we use so-called cookies on several pages. Cookies are little text files which are stored on your end device. Some of the cookies we use are deleted after the end of the browser session - after you closed the browser, that is ("session cookies"). Other cookies remain on your end device and allow us or our partner companies to recognize your browser the next visit (persistent cookies). You can

adjust your browser settings so you will be informed about the storage of cookies. You can then decide about storage of the cookies as well as exclude cookies for certain cases. If you do not accept cookies, this may result in functional restrictions on our website.

## Web analytics services

In order to ensure that our sites meet customer requirements and are continuously optimized, this website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). In this regard pseudonymised user profiles are created and cookies are used. The information about your usage of the website that is produced by the cookie will be transferred to servers and stored. This information includes

- browser type and version;
- the operating system you use;
- the referrer URL (the website you came from);
- the host name of the requesting computer (IP-address);
- the time of server request.

The data will be used to analyse how users browse the website and to put together reports about website activity. The data will be transferred to third parties, if it is required by law or in a case of contracted data processing.

The IP address will under no circumstances be linked to other user data. The IP addresses will be anonymised to guard you against re-identification (IP-masking).

Google Analytics uses cookies. The information created by the cookie will regularly be transferred to a Google server in the U.S. and stored there. If IP-anonymisation is activated for this website, your IP address will be shortened within the member states of the European Union or in other signatory states to the agreement on the European Economic Area. Exceptionally your full IP address will be transferred to a Google server located in the U.S. and will be shortened there. On behalf of the operator of this website Google will use this information to analyse how you use the website and to put together reports about website activity as well as to enable further services related to the usage of the website and the internet for the operator

of the website. The IP address which is transmitted by your browser in order to apply Google analytics will not be linked to Google's other data.

Any user can object to the creation of user profiles at any time by using the contact details provided below ("Information request, rectification, and deletion of data").

## Creation of pseudonymised user profiles for web analysis

On this website data is collected and stored by Google Analytics, a web analysis tool by Google Inc. ("Google"). This data will be used to create pseudonymised user profiles. These profiles serve as a tool to analyse user activity and will be used to improve our services according to customer's needs. In order to do so, cookies can be used.

The pseudonymised user profiles will not be linked to personal data unless the data subject gives explicit consent.

You can object to the future collection and storage of data for the purpose of web analysis at any time by written notice to the address mentioned below, by email (support@sottoluce.com) or telephone (+48 91 852 21 19).

## Transfer of personal data

Unless given the explicit consent of the data subject, we do not sell or rent your personal data to third parties for marketing purposes. This shall not apply in case of a legal obligation or if it is necessary to enforce our rights, especially our rights arising from an agreement with us.

Data will be transferred to the delivery company to the extent necessary for transportation. For the handling of payments we transfer payment data to the authorized banking institution.

### Use of Facebook social plugins

This website uses social plugins ("Plugins\") of the social network Facebook.com, run by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook\"). The plugins are branded with the Facebook logo and endorsed \"Facebook Social Plugin\". If you access a website to this web presence where such a plugin is installed, your browser establishes a connection with Facebook

servers. The content of the plugin is provided directly by Facebook and is embedded by your browser. GDC sp. z o.o. has no influence on how the data which Facebook collects using the plugin is handled. By embedding the plugin Facebook collects the information that you have visited the corresponding website of the web presence. If you are logged in as a Facebook user, Facebook can link your visit to your Facebook account. If you have a Facebook account and you do not wish Facebook to collect and link data via this web presence to your Facebook account, you must log off your account before you visit the website. For further information about the purpose and the extent of data collection and the processing and usage of the data by Facebook as well as corresponding rights and privacy settings please refer to the Facebook Data Use Policy.

## Information request, rectification, and deletion of data

You have the right to consult stored data about you free of charge and consequently the right to rectification, deletion or blocking of your data. Please direct your request in writing with clear identification to the following address: GDC sp. z o.o. ul. Bagienna 36C, 70-772 Szczecin, support@sottoluce.com.

The written form is of course not a condition to answer your request, although it facilitates the handling.

#### **Revocation of consent**

You may revoke your consent given to the use of your data for the purpose of advertising at any time and without stating any reasons per email to this address: support@sottoluce.com. An unsubscription link is included in every newsletter and other advertising emails.

## Timeliness of the data protection statement/span

This data protection statement is in force, dated 01.03.2016.