

# Privacy Policy

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## Basic Information

### Personal Data Administrator

**AQUASEED, s.r.o. (ZESTINO EUROPE)**, is registered at Medzevská 8, 04011 Košice, Slovakia, company identification No. 31709508, incorporated in the Business Register kept by the Municipal Court in Košice I., Insert 6354/V, as a data administrator shall process your personal data.

## Type of Data Processed

### Personal Data Provided By You

We process personal data provided by you.

### More Information

If you order goods or services from us, we need the information which is referred to as mandatory in the ordering process (in particular your given name, surname, company name /optional/, invoicing address and delivery address, telephone number). If we should not have this information, we would be unable to deliver your ordered goods. For the purposes of sale of goods or services, we also need your e-mail address, to which we shall send the order confirmation, invoice and the tracking data of your delivery.

You can also fill in optional information when ordering goods or services. Such information helps us perform the concluded purchase agreement more efficiently. For instance the delivery date requested by you, etc. Providing optional information is voluntary.

After the goods are delivered, you may get an e-mail message with the request to evaluate the goods purchased.

If you contact us via the customer line or you send us a message, we shall also process your personal data stated in such communication.

## Personal Data Obtained Other than Directly from You

As part of joint marketing campaigns organised together with our business partners, we are entitled to process your personal data and we may combine them for the purposes of campaigns or of due performance of the agreement, as the case may be.

In the event that your personal data is disclosed to a third party, we shall inform you in advance including informing you of the identity of such third party. If anyone discloses your personal data to us, you will have to be informed as well.

## Personal Data of Third Persons Provided by You

In the event you provide us personal data of third persons, you are obliged to inform the person concerned and procure his/her consent to this Personal Data Protection Policy.

## More Information

It may happen that you purchase goods from us but you do not wish to collect them or make a complaint regarding such goods. You can define authorised persons in your user profile, who shall be entitled to collect or claim goods. Thereby, you provide us their personal data.

## Personal Data Processed Automatically

When you visit our website, we may collect certain information such the IP address, date and time of the visit to our website, information about your Internet browser, operation system or language settings. We may also process information about your conduct on our website, such as links opened or goods displayed. The details of your conduct on the web are anonymised for the maximum protection of your privacy, the therefore we are not able to match them with a particular person.

## Cookies

We automatically process cookies. This is done through Google Analytics, which anonymises your personal data. It means that the **cookies are not possible to match with a certain person**. Therefore we cannot monitor (even if we wanted to) the conduct

of a certain user on our website. You are ensured maximum anonymity while making purchases on [zestinoeurope.eu](http://zestinoeurope.eu).

## More About Cookies

Cookies are collected through a script from Google Inc., which is located in the source code of our website. Your cookies are transferred to Google Inc. for anonymisation. Then we work with the anonymised cookies, which by then have ceased to be personal data. The process of anonymisation, i.e. transfer for anonymisation, is processing of personal data, made by us on the legal grounds of legitimate interest.

### What is a cookie file?

It is a small text file created upon a visit to a website. It is used as a standard tool for the storage of information about visits to our website.

Thus we can distinguish (not identify) individual users and customise the content to individual preferences. Cookies are important and web browsing would be more difficult without them.

### What are cookies used for?

Cookies serve several purposes. We use the following cookies on our website:

- Technical cookies: We use technical cookies to make our online shop work properly (e.g. for you to create a user profile, log in, and buy goods and services). The online shop would not work without cookies.
- Functional cookies: These help so that you do not have to log in and set your preferences repeatedly (e.g. setting the language in which our online shop might be displayed). Your password is always encrypted in such procedures. The use of these cookies is not necessary, but they make your visit to our online shop more comfortable.
- Analytical cookies: Analytical cookies help us improve our online shop, which ultimately benefits you. Analytical cookies on our website are collected by the Google Inc. script which subsequently anonymises the data. The data ceases to be personal data after anonymisation: anonymised cookies are not possible to match with a particular user or person. We only work with anonymised cookies. Therefore we are unable to find out the way in which a concrete user behaved on our website (sites visited, goods displayed etc.).

We also use the findings obtained from these cookies for advertising purposes; we may also display an ad that we consider relevant to you on other websites. If you want to have control over what analytical cookies we process, you can use this [add-on program from Google](#) (it can run only on a computer).

### How You Can Control Which Cookies We Will Process

You can use one of the common browsers (e.g. Internet Explorer, Safari, Mozilla Firefox, Chrome) with anonymous browsing switched on. This shall prevent storage of data concerning the sites visited. You can also block the storage of cookies in the browser. However, if you block the processing of technical and functional cookies, you will disable certain useful functions.

You can easily control the processing of analytical cookies by us if you use this [add-on program from Google](#) (it can run only on a computer). However, if you switch off analytical cookies you will make our improvement of the online shop difficult.

## Camera Systems in Our Stores

We automatically process camera recordings at our premises.

Our stores are monitored by camera systems with online transmission and recording. The stores are equipped with cameras for the sake of prevention and also of investigation of potential illegal activities. The camera systems are operated by us, AQUASEED, s.r.o. (ZESTINO EUROPE), company identification No. 31709508.

## Why We Collect and Process Your Personal Data

Your personal data is processed for the following reasons:

- Purchase of goods and services: the primary purpose of processing your data is due to dispatch and delivery of your order. If a problem occurs, we know who to contact from the data you provided.
- Customer care: if you contact us with a question/issue, we have to process your personal data in order to answer/resolve it. The data may be transferred to third parties in certain cases (e.g. a delivery company).
- User account: thanks to the personal data entered in your user profile, you will be able to use a number of functions (e.g. if you enter your telephone number, we can easily inform you about the time of the order delivery). You can change the entered details at any time, except for the e-mail address that serves for signing into your user account.
- Marketing:
  - Electronic marketing: e-mail commercial communication is sent to you upon your consent. You can easily unsubscribe from getting commercial communication by adjusting your user profile settings or contacting us by an email with subject "Unsubscribe" to [info \(at\) zestinoeurope.eu](mailto:info@zestinoeurope.eu).
  - Telemarketing: marketing calls are made in order to offer you goods and services and related marketing communication. The legal grounds for the processing of your telephone number is either with your consent or at least our legitimate interest in the conventional direct marketing. You are entitled to raise an objection to such processing directly while we contact you, or with an email to [info \(at\) zestinoeurope.eu](mailto:info@zestinoeurope.eu).
  - Marketing competitions: in some cases, the winner may be photographed or recorded mainly for the reason of transparency of our marketing competitions. Such processing of personal data is made on the grounds of our legitimate interest, which consists in the enhancement of credibility of the competitions for other competitors and increasing attractiveness of the competitions. You are entitled to raise an objection to such processing in person directly on the place of price handover.
- Improvement of services: we are able to offer relevant goods thanks to the history of your orders and conduct on the website (e.g. accessories to the product purchased). Therefore we display such products that are intended just for you and correspond to your needs and interests. In order to optimise web features, we can also use tools testing different variants (A/B testing), such as Google Analytics, Facebook Analytics etc.
- Customer reviews of goods and services: after you purchase products or services from us, you may be asked to evaluate them. You may also post a review on your own initiative.

- Call policy: If you call us, or one of our dealers, your call may be recorded upon prior notice. Such records serve for the inspection of quality of services provided by our staff.
- Assertion of rights and legal claims and inspection by public authorities: we can also process your personal data in order to assert our rights and legal claims (e.g. in the event that we have an overdue invoice in your name). We may also process your data for inspections by public authorities and other serious reasons.

## Legal Grounds for Processing of Personal Data

### Conclusion and Performance of Agreement

A large part of your personal data is needed by us in order to conclude the purchase agreement or another contract for goods and services you intend to purchase. After the agreement is concluded, we process your personal data in order to deliver the purchased goods, or to render the purchased services. We process in particular billing and delivery details on the above legal grounds.

### Legitimate Interest

We also use your personal data to provide you the relevant content, which may be of interest to you. On the grounds of legitimate interest, we process particular personal data, which is processed automatically, and cookies.

We may also send you e-mails and text messages on the same legal grounds. Processing of personal data related to monitoring via camera systems in our stores is based on the above legal grounds as well.

In case we process your personal data on these legal grounds, you are entitled to raise an objection to such processing by sending us an email to [info \(at\) zestinoeurope.eu](mailto:info@zestinoeurope.eu).

### Consent

For the purposes of e-mail marketing and telemarketing, we process your personal data upon your consent. If you do not grant your consent and you are our customer, we can send you commercial communication (or call you within telemarketing) even without your consent. In any case, you are entitled to ban such marketing communication simply by (a) adjusting your user profile settings or (b) sending us an email to [info \(at\) zestinoeurope.eu](mailto:info@zestinoeurope.eu).

We ask for your consent also if we need to verify your ability to pay for the goods delivered to you without your paying the full purchase price in advance.

If you grant your consent to the personal data processing, you are entitled to withdraw it at any time by sending us an email to [info \(at\) zestinoeurope.eu](mailto:info@zestinoeurope.eu).

# Transfer of Personal Data to Third Parties

Your personal data is transferred to third parties in the following cases:

- **Delivery of goods:** the courier would not be able to deliver the goods ordered unless we transfer your information where and to whom the goods should be delivered. This data is transferred to the courier as entered in the order. Such data includes in particular your given name and surname, company name (optional), delivery address, telephone number where the courier may contact you, your email address to inform you about the tracking data of the package and the amount to be paid on delivery (optional). The courier service is only entitled to process the personal data we transfer for the purposes of delivery; the courier service must delete the personal data promptly afterwards.
- **Delivery of goods stored for us by a contractual business partner - dealer:** if you order goods which are stored by our contractual partner, we have to transfer your personal data to this contractual partner who shall complete the order. Such data includes in particular your given name and surname, company name (optional), delivery address, telephone number, your email address. The contractual partner has to transfer the data to the courier that shall deliver the goods; otherwise the courier would not be able to make the delivery. The contractual partner that stores the goods for us and the courier are only entitled to process the personal data we transfer to them for the purposes of the goods storage/delivery; they must delete the personal data promptly afterwards. The full dealer list is always updated on our website here: <https://zestinoeurope.eu/dealers/>
- **Public Authorities:** in the event that we enforce our rights, your personal data may be transferred to a third party (e.g. an Attorney-at-Law). If we are obliged to transfer your personal data by virtue of law or upon a request by a public authority (e.g. Police), we have to do so.
- **Payment Cards:** Our company **does not** possess the details of payment cards used by you. The details of your payment cards are only available to the secure payment gateway and the relevant bank.

## More Information

When you pay by payment card from a mobile phone, you will be redirected to the secure payment gateway server. When you pay by payment card from a computer, an iframe is used for interaction with the payment gateway server (the payment gateway site is displayed on our website and redirecting is not necessary). Thus, your card details are not sent to our company but directly to the payment gateway provider via secure transmission. The payment gateway transfers the data to the relevant bank for the payment to be effected, again via secure transmission.

Our gateway providers are:

- Všeobecná úverová banka, a.s., Mlynské nivy 1, 829 90 Bratislava, Slovakia
- PayPal (Europe) S.à r.l. et Cie, S.C.A., 22 Boulevard Royal, L-2449 Luxembourg.

# What Is the Period for Processing Your Personal Data?

We shall process your personal data for the entire duration of the contractual relationship between you and us.

In case your personal data processing is based on consent, your personal data shall be processed until your consent is withdrawn.

In case you subscribe to commercial communication, your personal data shall be processed until you express your disapproval of such communication. You can easily express your disapproval by contacting us by email to [info \(at\) zestinoeurope.eu](mailto:info@zestinoeurope.eu).

Please note that the personal data necessary for the due rendering of services or for the fulfilment of all our duties, ensuing either from the contract between us or from generally binding legal regulations have to be processed regardless of whether you granted your consent for the period set out in the relevant legal regulations and in compliance therewith (e.g. tax documents must be processed for at least 10 years).

The recordings of phone calls from and to one of our dealers might be archived for a short period, not exceeding 1 year, unless it is necessary for us to store them for a longer period due to a legitimate interest (e.g. suspicion of data misuse, fraud etc.).

The camera records are usually stored for 90 days. If illegal conduct occurs in the monitored area, we can call the police and give the records to the relevant authority (police, court etc.). In such case, the records are not deleted after 90 days; we keep them for the sake of evidence until the issue is finally decided.

## Personal Data Security

Your personal data is safe with us. We have adopted adequate technical and organisational measures in order to prevent unauthorised access and misuse of your personal data.

At AQUASEED, s.r.o. (ZESTINO EUROPE) we are concerned about the protection of your personal data. Therefore we regularly check and improve our security. All communication between your device and our web servers is encrypted. Logins are hashed and your data is only stored on servers in secure data centers with limited, carefully controlled and audited access.

We try to use such safety measures that provide sufficient security based on state-of-the-art technology. The safety measures adopted are regularly updated.

# Personal Data of Children Younger Than 16 Years of Age

Our online shop is not intended for children under 16. A person under 16 is allowed to use our online shop only upon consent of his or her parent or guardian.

## What Are Your Rights Related to Personal Data Protection?

In relation to your personal data, you have in particular the right to withdraw your consent to the processing of your personal data at any time, the right to correct or supplement your personal data, the right to request restriction of processing, the right to raise an objection to or a complaint of the processing of your personal data, the right to access your personal data, the right to request the transfer of your personal data, the right to be informed of a breach of security of your personal data and, under certain conditions, the right to the deletion of certain personal data we process about you ("the right to be forgotten").

### Changes and Amendments

You control your personal data mainly through your user account (Account Settings). Here you can delete or change the basic information about yourself and change the settings concerning commercial communication (or unsubscribe), etc.

You can also contact us via sending us an email to: [info \(at\) zestinoeurope.eu](mailto:info@zestinoeurope.eu)

### Correction

In case you believe that your personal data has been processed incorrectly, you can contact us by sending us an email to [info \(at\) zestinoeurope.eu](mailto:info@zestinoeurope.eu).

### Access (Portability)

You can ask us to send you the overview of the personal data via sending us an email to: [info \(at\) zestinoeurope.eu](mailto:info@zestinoeurope.eu).

You also have the right to access the following information concerning your personal data:

- What are the purposes of processing your personal information
- What are the categories of the affected personal data
- Who is the recipient of your personal data, besides you
- What is the planned period of storage of your personal data
- Whether you have the right to claim the correction or deletion, restriction of personal data processing or to raise an objection to such processing
- Information on the source of the personal data in case we did not obtain them from you

## Deletion

You may also claim the deletion of your personal data (this shall not apply to data in documents that are subject to the obligation of archiving under the law (e.g. invoices or credit notes). In case we need your personal data to determine, execute or defend our legal claims, your request may be rejected (e.g. if we have an overdue invoice in your name or if the complaint procedure is in progress).

Please note that the essential details of your payment card are not stored by our company; they are stored at the payment gateway. Therefore, we are not able to delete such data; you have to address the payment gateway which mediated the payment (see section Transfer of personal data to third parties > Payment Cards > More information).

You are entitled to the deletion of data in the following cases:

- a. The personal data is not needed for the purposes for which it was being processed
- b. You have withdrawn your consent under which the data was processed and there is no further legal grounds for being processed
- c. You have objected to the processing of personal data and you believe that after assessing your objection, it will become clear that your interest in the particular situation prevails over ours
- d. The personal data has been processed unlawfully
- e. The deletion obligation is stipulated by a special legal regulation
- f. The personal data concerns a person under 16

You may assert your right by sending us an email to [info \(at\) zestinoeurope.eu](mailto:info@zestinoeurope.eu)

## Raising an Objection

Certain personal data is processed on the grounds of our legitimate interest (see section "Legal grounds for processing of personal data"). In the case that you have concrete reasons, you are entitled to raise an objection to the processing of this personal data. The objection can be raised by contacting us on our email: [info \(at\) zestinoeurope.eu](mailto:info@zestinoeurope.eu).

## Restriction of Processing

In case (a) you deny the accuracy of your personal data, (b) your personal data is processed unlawfully, (c) we do not need your personal data for processing purposes, but it is needed to determine, execute or defend your legal claims, or (d) you raised an objection under the preceding paragraph, you shall be entitled to us restricting the processing of your personal data.

In such cases, we may process your personal data only upon your consent (except for the storage or backup of the personal data concerned).

## Lodging a Complaint

If you believe that your personal data has been processed unlawfully, you are entitled to lodge a complaint at the Office for Personal Data Protection. However, we will appreciate if you address us first and we can try to resolve your concerns. You can always easily contact us by sending us an email to: [info \(at\) zestinoeurope.eu](mailto:info@zestinoeurope.eu).

This Personal Data Protection Policy including its parts is valid and effective from 25 May 2018 and it is available in electronic form at [www.zestinoeurope.eu](http://www.zestinoeurope.eu).