

# PRIVACY NAD COOKIE POLICY

## ETERNESS

[www.eterness.co.uk](http://www.eterness.co.uk)

### **I. General information**

1. This document specifies the privacy principles applicable in the Online Shop [www.eterness.co.uk](http://www.eterness.co.uk) (hereinafter referred to as the “Online Shop”).
2. For the purposes of data protection legislation, we are the data controller of your personal data. KIWORS TRADING COMPANY LIMITED, company number 08777938, 53 Eley Drive, Rottingdean, BN2 7FG, [contact@eterness.co.uk](mailto:contact@eterness.co.uk) .
3. We are committed to complying with the GDPR and the Data Protection Act 2018.

### **II. Personal information**

1. The Controller collects information provided voluntarily by the Online Shop Customers. However, the provision of marked personal data is a condition for placing an order.
2. Moreover, The Controller may record the information about connection parameters, like IP addresses, for technical purposes, for server administration and for collection of general, statistical demographic information (e.g. about the region from which the connection comes), and also for security purposes.
3. The Controller shall make an extra effort in order to protect privacy and information about the Online Shop Customers provided to him. The Controller shall exercise due diligence when selecting and applying appropriate technical measures, including those of programming and organizational nature, in order to protect the processed data, and in particular he shall protect the data from unauthorized access,

disclosure, loss and destruction, unauthorized modification, and also from their processing with the breach of the applicable provisions of law.

4. Personal data will be processed in accordance with the principles of art. 5 GDPR.
5. Personal data will be:
  - a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
  - b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; ('purpose limitation');
  - c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
  - d) accurate and, where necessary, kept up to date ('accuracy');
  - e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; ('storage limitation');
  - f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

### **III. Legal basis**

1. The basis for the processing of the Customer's Personal Data is primarily the necessity to perform the contract to which he is a party or the need to take action at his request prior to its conclusion (Article 6 par 1 (b) of GDPR).
2. After expressing separate consent, pursuant to art. 6 par. 1 (a) GDPR data may also be processed for the purpose of sending commercial information by electronic means or making telephone calls for direct marketing purposes.
3. In other purposes, the Customer's Personal Data may be processed on the basis of:
  - a) applicable law when processing is necessary to fulfill the legal obligation of the Controller e.g. when based on tax regulations or accounting one, The Controller settles concluded sales contracts (Article 6 (1) (c) of the GDPR);

- b) indispensable for purposes other than those mentioned above resulting from legitimate interests pursued by the Controller or by a third party, in particular to determine, assert or defend claims, market and statistical analyses (Article 6 (1) (f) GDPR).
4. Personal data processed for purposes related to the purchase will be processed for the period necessary to complete the purchase and order, after which the data subject to archiving will be stored for the period appropriate for the limitation of claims. Personal data processed for marketing purposes covered by the consent statement will be processed until the consent is revoked.

#### **IV. The personal data we collect and use**

1. We ensure that the collection and use of your personal data is lawful. Therefore, for the purposes listed below, we only use your personal data if one of the following conditions apply:
  - a) You have given us your consent;
  - b) We need your personal data for the performance of a contract you enter into with us, such as when you purchase a product through the website ;
  - c) We need to comply with legal obligations ;
  - d) We need to protect your vital interests ;
  - e) Your data is necessary for the public interest, or ;
  - f) We have a legitimate interest in processing the personal data.
2. We may collect the following:
  - a) Contact information : First name, Email ;
  - b) Purchases : First name, Last name ,email, phone, postal address ;
  - c) Anonymous statistical information about your visits to our website and the resources that you access, including, but not limited to, traffic data, location data, weblogs and other communication data.
3. If you make a purchase our third party payment provider (PayPal, Stripe) may require additional personal information. This information, which is required to process your payment, is not collected or stored by us. We do not store credit or debit card details nor do we share customer details with any 3rd parties, unless it is

for the purpose of delivering the product or service you have purchased. During the payment process you will be able to read the payment providers privacy terms.

## **V. Recipients of personal data**

1. Recipients of the Buyer's personal data may be entities performing the order at the Seller's request and handling it, such as: shipment companies, accounting companies, suppliers of the goods, assembly services, providers of IT solutions, payment processing companies, banks, companies providing marketing services, telecommunication providers, law offices, authorised state authorities.
2. We do not allow third-party suppliers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.
3. In order to process your personal data for the purposes set out in this Privacy Policy, we may transfer your personal data to third parties that are based outside of the EEA or the UK. For any personal data transfers to the EEA we will continue to follow all regulatory and legal requirements set out EU-UK Trade and Cooperation Agreement, and any subsequent arrangements that are agreed.
4. Whenever we transfer your personal data out of the EEA, we attach a similar degree of protection to it (as it would receive in the EEA) by ensuring at least one of the following safeguards is implemented:
5. We will only transfer your personal data to countries, territories or sectors within a country that have been deemed to provide an adequate level of protection for personal data by the European Commission.
6. The transfer is subject to a legally binding and enforceable commitment on the recipient to protect the personal data (e.g. through the use of European Commission approved standard contractual clauses).
7. The transfer is made subject to binding corporate rules.
8. The transfer is based on a derogation from restrictions on transferring personal data outside of the EEA (such as where you give your consent, the transfer is necessary for the performance of contract with you, or the transfer is necessary for the establishment, exercise or defence of legal claims).

## **VI. Your rights on personal data concerning you**

1. As Customers provide their personal information voluntarily, they shall have the right to access their personal data and the right to rectify, delete, limit the processing, the right to data transfer, the right to object, the right to withdraw consent at any time .
2. Detailed conditions of the above rights shall be indicated in Articles 15-22 of the GDPR Regulation.
3. We'd like the chance to resolve any complaints you have, however you also have the right to complain to the UK data protection regulator (the "ICO") about how we have used your personal data. Their website is <https://ico.org.uk/your-data-matters/raising-concerns/>.
4. Their website also contains useful information about your privacy rights <https://ico.org.uk/for-organisations/resources-and-support/your-data-matters>.

## **COOKIES**

1. We use cookies on our website.
2. When viewing the Online Service websites “cookie” files are used, which are small text files recorded in the Customer’s target device in connection with using the Online Service. They are used in order to improve the experience with the Online Service websites.
3. The “cookie” files used by the Controller are safe for the Customer’s devices. In particular, it is not possible for viruses or other unwanted or malicious software to enter the Customer’s devices in that way. Those files allow to identify the software used by the Customer and to adjust the Online Service to each Customer individually. “Cookie” files sometimes contain information about the domain name of their origin, how long they are kept in the device and the ascribed value.
4. Due to the purpose of collecting cookies, we distinguish the following Cookies:

- a) necessary Cookies: necessary for the proper functioning of the service - files processed on the basis of the legitimate interest of the controller (Article 6(1)(f) of the GDPR);
  - b) statistics Cookies: they allow us to study website traffic, learn about our users' preferences, analyse their behaviour on the site and enable interactions with external networks and platforms - files processed based on the user's voluntary consent (Article 6(1)(a) of the GDPR);
  - c) marketing Cookies: they allow us to tailor the advertising and content displayed to our users' preferences and to conduct personalized marketing campaigns - files processed based on the user's voluntary consent (Article 6(1)(a) of the GDPR).
5. "Cookie" files may be used by advertisement networks, in particular by the Google network, in order to display advertisements adjusted to the way the Customer uses the Online Service. To that end, the information may be retained about the Customer's navigation path or the time spent on the given website.
  6. As regards the information about the Customer's preferences collected by the advertising network Google, the Customer may view and edit the information related to cookie files by means of the following tool:  
<https://www.google.com/ads/preferences/>.
  7. The Customer may, by himself and at any time, change the "cookie" files settings, specifying the conditions of their storing and of their access to the Customer's device. The settings referred to in the previous sentence may be changed by the Customer through the web browser settings or through configuration of the service. Those settings may be changed in particular so as to block automatic support for "cookie" files in the web browser settings or to inform each time they are introduced to the Customer's device. Detailed information about the possibilities and ways of supporting cookie files is available in the software (web browser) settings.
  8. To learn how to manage cookies, including how to disable them in your browser, you can use the help section of your browser. You can learn more about this by pressing the F1 key while in your browser. In addition, you will find appropriate tips on the following pages, depending on the browser you are using:

Firefox

Chrome

Safari

Internet Explorer / Microsoft Edge

9. The Customer may remove “cookie” files at any time, using the functions available in the web browser he uses.
10. Limitation of the “cookie” files application may affect some functionalities available on the Online Service website.
11. We use the services of:
  - a) Google Ads provided by Google Ireland Ltd. | Gordon House, Barrow Street, Dublin 4, Ireland to optimize advertising, remarketing and popularization of the Service.
  - b) Google Analytics is provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). We use Google Analytics with the additional function offered by Google to anonymize IP addresses. While doing so, Google already shortens IPs within the EU in most cases and only does so in the United States in exceptional cases, while always saving shortened IPs only.