

## **1. PRIVACY POLICY**

This "**Privacy Policy**" (hereinafter referred to as "Policy") applies to all "**Users**" (hereinafter referred to as "You", "You", "Yours") of "I-Retail Lab" SIA (hereinafter referred to as "We", "Us", "Our") "**Website**" (hereinafter referred to as "Website").

Read the Policy carefully before placing an Order. Over time, we may make revisions to the policy, please read it before making another purchase.

In accordance with the general data protection rules, personal data is any information that can be used to identify a person, as well as any information about a person who has already been identified. By using our Website services, you provide us with your personal data, the rights to process and use it in accordance with the terms and conditions set forth in the Privacy Policy.

We pledge to protect the privacy and security of our customers and visitors to our Website, including Yours. By using the services of our Website, You express your trust in Us. We fully value and respect the importance of the confidentiality and privacy of your data.

We respect the principle of personal data minimization - we do not require, collect or process personal data that is not necessary to achieve the goal - to purchase goods, services or receive information. We respect Your privacy and do our utmost to store Your personal data securely. We do not allow unsolicited communications and will in no way allow the sale, lease or transfer of any personal data (name, address, e-mail address, etc.) to third parties. Information to third parties may be disclosed only on the basis of a legitimate request, agreement or with Your consent, for example, when making a purchase on lease.

You are accountable for the accuracy of the information when placing an order or contacting customer support. You confirm that you are not under 16 years of age, and commit yourself not to take any actions that are directed against the security of the site.

We are not liable for incorrect, incomplete or erroneous data provided by you. By using our Website and / or by purchasing goods and / or services, You acknowledge that you understand the Policy and you agree to keep track of the revisions therein.

If You do not agree to this Policy or some of the specific definitions therein, please do not use the services of our Website.

## **2. WHAT DATA ARE WE COLLECTING AND PROCESSING?**

When you make a purchase or contact Customer Support, you provide us with your personal information. When making a purchase, the submission of personal data is compulsory, as without it you will not be able to make a purchase.

We collect and store the following data:

- name and surname of the customer;
- Phone number;
- E-mail address;
- the address of delivery of goods or services.

We collect, but do not store the following data:

- personal data necessary to record a purchase on a lease.

We process, but we do not store the following impersonal data:

- cookies.

Private information is used only to provide a full service and customer service.

We may only receive your personal information from you and only if you use our site facilities, such as: order registration, contact customer support via feedback form or e-mail.

## **3. WHY DO WE COLLECT YOUR DATA**

**We use the information which We collect about you to:**

- sell our goods and services;
- properly process and deliver your order;
- provide warranty and post-warranty support;
- answer Your questions and provide You with information;
- provide you with personalized access to our Website;

- Manage your account if you have one on our Website;
- compile anonymous statistics about the usage of the Website.

## **6. FOR HOW LONG DO WE STORE YOUR DATA**

We store our customers personal information for 10 years:

- to provide the purchased goods with warranty and post-warranty support;
- to contact You on request;
- accountancy;
- to manage Your settings and rights.

After the expiration of 10 years, personal data will be erased if you do not request the deletion of your data through the Website, or personally arriving at the "I-Retail Lab" SIA office (with an identity document) during this period.

The personal data necessary for the leasing contract is transferred to the leasing company's servers in an encrypted form using the SSL standard, and after the order is processed, they are deleted from the company servers and "I-Retail Lab" SIA does not retain them, with the exception of data relevant to processing of payment and as such included in the company's accounting records.

## **7. HOW IS DATA PROTECTION ORGANIZED**

Our website is stored in one of the most trusted data centres in the world. In order to protect your personal data, we utilize all the features of our service provider, including constant physical protection against unauthorized access and encryption throughout the day.

The security of our site is ensured through the following, as well as other means:

- encryption of data transmission using the SSL standard;
- personal data is stored on servers in encrypted form;
- Your personal data is automatically anonymized upon completion of the order (delivery, cancellation or return of goods);
- access to personal information and data is limited and only possible to selected and authorized "I-Retail Lab" SIA employees using 2FA (Two-factor Authentication) and SSH private key authentication;
- Data Centre employees do not have physical and / or remote access to our Website servers;
- 24-hour physical security of the facility and existing entry restrictions;
- 24-hour video surveillance of the data centre;
- biometric entry control with two factor authentication.

## **8. DATA TRANSFER TO THIRD PARTIES**

Your data may be transferred to a third party - a leasing company only in cases where you wish to use the services of the leasing company, by drawing up an order and filling out an appropriate form on our Website.

Third parties may also include data centers, support services, delivery services, cloud storage services, etc. Personal data controllers that help us provide you with services. Whatever the case, only the amount of data necessary for the execution of a specific task or the provision of a particular service is transferred to the data controllers. The third parties associated with us may process your personal data only for specified purposes and they cannot be used for any other purpose or transferred to other persons without our consent. Data controllers ensure the protection of Your personal data in accordance with applicable laws and regulations and written agreement with "I-Retail Lab" SIA.

Personal data may be transferred to the competent authorities of the state and government, including law enforcement authorities such as the police or other supervisory authorities, but only if necessary and in accordance with the legal procedures specified in regulatory enactments.

## **9. DATA TRANSMISSION TO THIRD COUNTRIES**

"I-Retail Lab" SIA does not transfer personal information and other data to third countries. The personal and other user data is only issued on the basis of a legitimate request.

## **10. COOKIES POLICY**

Cookies are small bits of data that the Website saves on your computer or mobile device during a visit to the Website.

This allows the server to collect information from the browser, so you do not have to re-enter data when returning to the site.

You can learn more about how cookies work on [www.cookiecentral.com](http://www.cookiecentral.com)

## **11. HOW DO WE USE COOKIES**

We use session and regular cookies to:

- improve the quality of services provided;
- identify new or existing customers;
- remember your setting preferences, such as settings for displaying a list of goods;
- remember if you have already responded to popup questions (to not ask you to do it again);
- remember if you agree (or don't) to the use of cookies on our Website;
- send you promotional messages that best suit your interests;
- collect reliable information about the usage of the Website, which will allow us to evaluate how well the website corresponds with the needs of Users and to make the necessary improvements;
- analyze which pages You visit and which user confidentiality tools You use.

Enabling Cookies is not strictly required for the core functions of the Website, but they will guarantee you a better experience while using the Website.

However, you can delete or block cookies at any time. In such case, some features of this Website will not work properly.

The cookie information is not used to identify you personally, and the data collected is stored under our supervision.

Cookies are not used for any purposes other than those mentioned here.

## **12. USER RIGHTS**

Legislation on the protection of personal data, including the General Data Protection Regulation, gives you a number of rights, and, in turn, we must provide you with the opportunity to exercise them.

- You have the right to request a copy of your personal information to verify the accuracy of the information stored and / or to correct or update this data;
- You can at any time refuse to receive emails by sending a notice to "I-Retail Lab" SIA. or by using a link in electronic letters;
- In cases where your data is processed with your consent, you have the right at any time to withdraw your consent, which serves as the basis for termination of data processing;
- You are entitled to receive your data processing confirmation, the right to review the processed data, to obtain information about the processing objectives, the processing period, the sources of data receipt, their significance and the consequences for You;
- You may request that your personal information be completely erased (unless this is in conflict with the legislation of the Republic of Latvia).

In order to protect your confidentiality and security, we will take appropriate steps to verify your identity before providing your requested information about your personal data. For this purpose, we may ask you to submit a personal identification document and / or to visit our office personally. If you cannot prove your identity, we can reject your application.

We will use all commercially reasonable efforts to ensure, within 30 days of receipt of your access request, lawful access to your personal information that we store.

You must understand and accept the risks associated with the erasure of your personal data, for example:

- Our inability to identify you as a customer when contacting a customer support and warranty service;
- difficulties or inability to identify your purchase in the event you turning to a warranty service centre;
- the difficulty or complete failure to recover the purchase documents in the event of their loss;
- and other risks.

### **13. WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA**

The data controller and the entity responsible for the processing of Your personal data is "I-Retail Lab" SIA, **Company Number:** 40203083986, **Address:** Matisa iela 61 - 28, Riga, LV-1009, Latvija  
In case You have any claims regarding the processing of personal data in our company, You have the right to file a complaint with the State Data Inspection.

### **14. REVISIONS OF POLICY**

We review our Privacy Policy on a regular basis. All changes made will be published on this page. This Privacy Policy came into force and was last updated on March 23, 2020.