## **Privacy Policy**

Data privacy is of high importance for MX ALC and we want to be open and transparent with our processing of your personal data. We therefore have a policy setting out how your personal data will be processed and protected.

### Who is the controller of your personal data?

The CROATIAN company, MX ALC, is the controller of the personal data you submit to us and responsible for your personal data under applicable data protection law.

MX ALC, Mali Ježenj 7b, 52000 Pazin, Croatia

Companies register: Commercial Court in Pazin Company registration number: OIB 31939311292

# What types of personal data do we process?

We will process any data you provide to us, including the following categories

Contact information such as name, address, e-mail address and telephone number Order information
IP address
What products and offers you have clicked on
Shopping history
How you navigated and clicked on the site

# Why do we use your personal data?

Online purchase

We will use your personal data to manage your purchase online at MX ALC by processing your orders and returns via our online services and send you notifications of delivery status or in the event of any problems with the delivery of your items. We will also use your data in order to handle complaints and warranty matters for products. Your personal data is being used to identify you and to validate your legal age for shopping online. Your personal data is being used to identify you and to validate your legal age for shopping online.

## **Automated decision making**

When you apply for credit as a method of payment we will perform an automated decision-making process regarding your credit application.

#### **Direct marketing**

We will use your personal data to send you marketing offers and invitations through e-mails and text messages. In order to optimise your experience of MX ALC we will provide you with relevant information, recommended products, send you reminders of products left in your shopping bag and send you personalised offers. All these great services are based on your previous purchases, what you have clicked on and information you have submitted to us.

## **Customer service**

We will use your personal data to manage your queries, to handle complaints and warranty matters for products and technical support matters through e-mail, our chat function, telephone and through social media. We may also contact you if there is a problem with your order.

## **Development and improvement**

We will use data to evaluate, develop and improve our services, products and systems for all of our customers. For this purpose we will not analyse your data on an individual level, all processing will be done on pseudonymised data. This includes analysis to make our services more user-friendly, such as modifying the user interface to simplify the flow of information or to highlight features that are commonly used by our customers in our digital channels and to improve IT systems in order to increase the security for our visitors and customers in general. The analysis is also used to develop and constantly improve the logistics flow of goods by forecasting purchases, stocks and deliveries as well as our resource capacity from a sustainability point of view by streamlining purchasing and scheduling of deliveries.

## **Fulfilment of legal obligations**

We will use your personal data to comply with obligations in laws, court rulings and decisions from authorites. This includes using your personal data to collect and verify accounting data to comply with our book-keeping rules.

## Prevention of misuse and crime

We will use your personal data for loss prevention management by securing that terms and conditions are being followed and to detect and prevent misuse of our services. We will also use your personal data via video surveillance for security reasons. This data will be used to be able to follow up on incidents and to prevent and report criminal offences in our stores. Your personal data will be used to prevent and investigate abuse of our services online and losses and fraud, by analysing online shopping behavior.

## What is the legal ground to process your personal data?

Online purchase

The processing of your personal data is necessary for MX ALC to fulfil the service of managing and delivering the order to you (performance of a contract).

## **Direct marketing**

The processing of your personal data is based on MX ALC's legitimate interest.

#### **Customer service**

The processing of your personal data is based on MX ALC's legitimate interest.

# **Development and improvement**

The processing of your personal data is based on MX ALC's legitimate interest.

### **Fulfilment of legal obligations**

The processing of your personal data is necessary for MX ALC to fulfil its legal obligation.

## Prevention of misuse and crime

The processing of your personal data to prevent misuse of our services is based on our legitimate interest.

## Who has access to your personal data?

The data that we collect from you is stored within the European Economic Area ("EEA") but may also be transferred to and processed in a country outside of the EEA. Any such transfer of your personal data will be carried out in compliance with applicable laws. We don't sell, trade or share your data for marketing purposes to a third party. Data that is forwarded to third parties, is only used to provide you with our services. "Your personal data that is forwarded to third parties, is only used to

Provide you with the services mentioned above

Communication agencies to send you order confirmation

Warehouse and distribution suppliers in connection with the delivery of your order

Payment service providers for your payment"

Data that is forwarded to third parties is only used to provide you with the service mentioned above, to media agencies and technical suppliers for distribution of physical and digital direct marketing. Please be aware that many of these recipient companies have an independent right or obligation to process your personal data. For transfers outside the EEA, MX ALC will use Standard Contractual Clauses and Shields as safeguards for countries without adequacy decisions from the European Commission.

### How long do we save your data?

We will save your data to be able to comply with your rights towards us and in compliance with the book-keeping rules in your country. After this time period your personal data will be deleted.

# What are your rights?

Right to access

You have the right to request information about the personal data we hold on you at any time. You can contact MX ALC and we will provide you with your personal data via e-mail.

## Right to rectification

You have the right to request rectification of your personal data if the information is incorrect, including the right to have incomplete personal data completed.

## Right to erasure

You have the right to erase any personal data processed by MX ALC at any time except for the following situations:

# You have an ongoing matter with Customer Service

If you are suspected or have misused our services within the last four years

If you have made any purchase, we will keep your personal data in connection to your transaction for book-keeping purposes Your right to object to direct marketing

You have the right to object to direct marketing, including profiling analysis made for direct marketing purposes. You can opt out from direct marketing by the following the instructions in each marketing e-mail. When you do so, MX ALC won't be able to send you any further direct marketing offers or information based on your consent.

# Right to complain with a supervisory authority

If you consider MX ALC to process your personal data in an incorrect way you can contact us. You also have the right to raise a complaint to a supervisory authority.

#### Cookies

A cookie is a small text file that is saved to, and, during subsequent visits, retrieved from your computer or mobile device. If you use our services, we will assume that you agree to the use of such cookie.

## How do we use cookies?

We use permanent cookies to store your details if you select "Remember me".

We will use cookies to save your favourite products.

We use session cookies for example when you use the product filtration function or if you put an item in your shopping bag. We use both first- and third-party cookies to collect statistics and user data in aggregate and individual form in analysis tools to optimize our site and to present you with relevant marketing material.

Some third-party cookies are set by services that appear on our pages and are not in our control. They are set by social media providers such as Facebook and Youtube and relate to the ability of users to share content on this site, as indicated by their respective icon.

We also use third-party cookies which performs cross-site tracking in order for us to give you marketing in other sites/channels. What types of personal data do we process?

We will only connect your cookie ID to your personal data submitted and gathered in relation to your purchase.

# Who has access to your personal data?

Data that is forwarded to third parties is only used to provide you with the services mentioned above, analysis tool in order to collect statistics to optimize our site and present you with relevant material.

## What is the legal ground to process your personal data?

We will only connect your cookies to your personal data if you are a customer. The processing of your personal data is based on your consent when you agree to cookies.

### How long do we save your data?

MX ALC does not save your personal data. You can easily erase cookies from your computer or mobile device using your browser. For instructions on how to handle and delete cookies please look under "Help" in your browser. You can choose to disable cookies, or to receive a notification each time a new cookie is sent to your computer or mobile device. Please note that if you choose to disable cookies, you will not be able to take advantage of all our features.