### **DATA PRIVACY POLICY**

### Sect. 1 General Scope

We will process your personal data (e.g. title, name, address, e-mail address, phone number, bank details, credit card number) solely in accordance with the provisions of the German data protection law and the data protection law of the European Union (EU). The following provisions will inform you, besides the information about the processing purposes, recipients, legal bases and storage periods, also about your rights and the controller for your data processing. This privacy policy applies only to our websites. If you are directed to other sites via links on our pages, please pay attention and be sure to review their privacy practices.

## Sect. 2 Inventory data

## (1) Purpose of data processing

Your personal data you provide us during the ordering process are necessary for the conclusion of a contract with us. You are not obliged to provide your personal data. However, we would not be able to send you the goods without your address. For some payment methods we ask for the necessary payment data in order to pass them on to a payment service provider commissioned by us. Hence, the processing of your data collected during the ordering process is soley for the purpose of contract performance.

If you send us a request by e-mail or by using the contact form, etc. before concluding the contract, we process the obtained data to carry out pre-contractual measures and answer your questions about e.g. our products.

In the case of opening a customer account, your data (in particular name, address, payment method, e-mail and password) will be processed for registration and creation of a customer login. With the stored data, you are able to shop faster and view your previous orders at any time. By sending us a note or via a delete function you can delete the account again.

#### (2) Legal basis

The legal basis for such processing is set out in Article 6 (1) (b) of the GDPR.

# (3) Recipient categories

Payment service provider, shipping service provider, hosting provider, if necessary merchandise management system, suppliers if necessary (drop-shipping).

## (4) Duration of Storage

We store the data required for contract execution until the statutory warranty and, if applicable, contractual warranty periods expire.

We store the data required under commercial and tax law for the statutory periods, generally ten years (cf. § 257 German Commercial Code (HGB), § 147 Regulation of Taxation (AO)).

The data processed for the execution of pre-contractual measures will be deleted as soon as the measures have been carried out and the contract cannot be concluded.

#### Sect. 3 Comments

## (1) Purpose of data processing

Adding comments is possible. Your personal data (e.g. name/pseudonym, email address, website) collected in this scope will be solely processed for the purpose of publishing your comments.

## (2) Legal basis

The legal basis for such processing is set out in Article 6 (1) (f) of the GDPR.

### (3) Legitimate interest

Our legitimate interest is the public exchange of user opinions on specific topics and products. The publication serves, among other things, the purpose of transparency and opinion-forming. Your interest in data protection is preserved, as you can publish your comment under a pseudonym.

#### (4) Duration of Storage

There is no provision for a certain storage period. You may request the deletion of your comment at any time.

#### (5) Right of objection

You have the right to object at any time to the processing of data which was performed according to Article 6 (1)(f) of GDPR and which does not serve direct marketing for reasons arising from your particular situation.

In the case of direct marketing, however, you may object to the processing at any time without stating any reasons.

#### **Sect. 4 Further information**

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### Sect. 5 Web Analysis with Google Analytics

### (1) Purpose of data processing

This website uses Google Analytics, a web analysis service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Irland ("Google"). Google Analytics uses so-called 2/8

"cookies", small text files, which are placed on your computer to analyze how you use the website. The information generated by the cookie about your use of this website will be transmitted and saved on server in the United States by Google. If the anonymizeIP function is activated on this website, Google will shorten your IP address in advance within the member states of the European Union or in other states which are parties to the Agreement on the European Economic Area. Only in exceptional cases Google will transmit the full IP address on server in the United States and will shorten there. Google will use this information for the purpose of evaluating your use of our website, compiling reports on website activities and providing other services related to website and internet usage for the website operators.

## (2) Legal basis

The legal basis for such processing is set out in Article 6 (1) (a) of the GDPR.

## (3) Recipient categories

Google and its partners.

#### (4) Transfer to a third country

Google Ireland Limited is an affiliate of Google LLC. Google LLC is based in the USA (1600 Amphitheatre Parkway, Mountain View, CA 94043).

### (5) Duration of Storage

Unlimited

# (6) Right of objection

You can prevent the installation of the cookies in your browser settings. If you choose to change your settings you may not be able to use the full functionality of this website. You can also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by Google by downloading and installing the browser plug-in available under the following link: optout

You may also generate blocking by setting an opt-out cookie. If you want to prevent the future collection of your data when you visit this website, please click here: <u>Disable Google Analytics</u>

### Sect. 6 PayPal-transactions

Please note that all PayPal transactions are subject to the PayPal Privacy Policy: https://www.paypal.com/de/webapps/mpp/ua/privacy-full

#### Sect. 7 Credit check

Please note the following privacy policy when choosing paymorrows payment services: https://paymorrow.de/datenschutzbedingungen-online-kaeufer

Please note the following privacy policy when choosing Klarna payment services: <a href="http://cdn.klarna.com/1.0/shared/content/legal/terms/0/de\_de/privacy">http://cdn.klarna.com/1.0/shared/content/legal/terms/0/de\_de/privacy</a>

Please note the following privacy policy when choosing BillPay payment services: <a href="https://www.billpay.de/de/datenschutz-de/">https://www.billpay.de/de/datenschutz-de/</a>

#### Sect. 8 Information about cookies

## (1) Purpose of data processing

This website uses technically necessary cookies. These are small text files that are stored in or by your Internet browser on your computer system. These cookies are employed, for example, when several products must be inserted in a shopping cart.

Other cookies remain stored permanently and recognize your browser on your next visit. These cookies are employed, for example, to store permanently your passwords for a customer account.

#### (2) Legal basis

The legal basis for such processing is set out in Article 6 (1) (a) of the GDPR.

You have expressly given your consent to the use of cookies on our website as follows:

I agree that sample cookies for the sample purpose are stored permanently on my device. I can revoke my consent at any time as follows:...

#### (3) Duration of Storage

The technically necessary cookies are usually deleted when the browser is closed. Permanently stored cookies remain stored from a few minutes to several years.

### (4) Right of revocation

If you do not wish these cookies to be stored, please deactivate the use of cookies in your Internet browser. However, this may cause a functional limitation of our website. Your consent to persistent cookies can be withdrawn at any time by deleting the cookies in your browser settings.

### Sect. 9 Social plugins

(1) We use social plugins from facebook.com, operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA. The plugins can be recognised by the Facebook logo or the addition of "Facebook social plugin". If you click on the "Like" button or enter a comment, the corresponding information is sent directly from your browser to Facebook and stored there. Details on the handling of your personal data by Facebook and your relevant rights can be found in the privacy policy: Facebook. If you do not want Facebook to collect information about you via our web pages, you should log out of Facebook before you visit our website. You can prevent the storing of Facebook plugins also with add-ons for your browser completely, e.g. with the "Facebook blocker" (Facebook).

- (2) In connection with Twitter and the Re-Tweet functions, we use the so-called "social plugins" from twitter.com, operated by Twitter Inc. 795 Folsom St., Suite 600, San Francisco, CA 94107, USA. The plugins are marked with a Twitter logo such as the blue "Twitter bird". If you use the Re-Tweet functions, the web pages you visit will be disclosed to third parties and linked to your Twitter account. For details on the use of your data by Twitter as well as on your rights and setting options to protect your personal data, please see the privacy policy: Twitter. If you do not like the fact that Twitter directly assigns the data collected over our web appearance to your Twitter account you must out-log on Twitter before your visit of our website. You can prevent the storing of Twitter plugins also with add-ons for your browser completely, e.g. with the script blocker (NoScript).
- (3) Muster PluginDiese Websithttps://www.janolaw.de/jcportal/assistent/modules/ed2195b20cbf48f5b675d557b51caa01\_1/dialoglanguages/f6b15bb1bd3c4e71be45845068559b26\_1?assistentObject\_cld=1664872238067#dee nutzt das Plugin der Muster AG, Musterstraße 12, 55555 Musterstadt .... Eingegeben werden müssen der Verarbeitungszweck, die Rechtsgrundlage, ggf. das berechtigte Interesse, Empfängerkategorien, Speicherfristen, Widerspruchsrechte

#### Sect. 10 Affiliate Awin

## (1) Purpose of data processing

This website uses text links, image links, advertising banners of the partner program of Awin AG, located in Eichhornstraße 3, 10785 Berlin. Awin uses tracking domain cookies, journey tags/master tags and device fingerprinting, among other things. These technologies allow Awin to analyze the success of third-party ads published on our site.

When you click on an advertisement displayed, Awin sets a cookie on your device. Your journey from our website via Awin's domains/network to the advertiser's websites can thus be tracked by Awin.

This enables Awin to evaluate the success of the advertisements published on our website and to process our commission payments.

#### (2) Legal basis

The legal basis for setting cookies on your terminal device is your consent (see Article 6 (1) (a) of the GDPR).

#### (3) Recipient categories

Awin, advertiser

## (4) Duration of Storage

The functional duration of the set cookies is displayed in our Consent Management Tool.

#### (5) Right to withraw

You can withdraw your consent to the setting of cookies via the cookie banner or the consent management tool.

You can also delete cookies in your browser at any time.

## Sect. 11 Newsletter

#### (1) Purpose of data processing

When registering for the newsletter, your e-mail address will be used for advertising purposes, i.e. the newsletter will inform you in particular about products from our product range. For statistical purposes we may evaluate which links are viewed in the newsletter. However, it is not recognizable for us, which concrete person has accessed the links. You have expressly given the following consent separately or, as the case may be, in the course of the ordering process: Subscribe to the newsletter

## (2) Legal basis

The legal basis for such processing is set out in Article 6 (1) (a) of the GDPR.

## (3) Recipient categories

if necessary: newsletter provider

### (4) Duration of Storage

Your e-mail address will only be stored for the respective duration of your registration.

#### (5) Right of revocation

You may revoke your consent at any time with effect for the future. If you no longer wish to receive the newsletter, you may unsubscribe as follows: By a log-out link in the newsletter

# Sect. 12 Your rights as a data subject

If your personal data is processed, you are the 'data subject' in terms of GDPR and you have the following rights towards us, the controller:

#### 1. Right to information

You may request us to provide information about your personal data processed by us under Article 15 of the GDPR.

#### 2. Right to rectification

If your personal data provided to us is not up to date or not accurate you have the right to ask for modifications to your personal data under Article 16 of the GDPR. You also have the right to request us to complete an incomplete data.

## 3. Right to erasure

You have the right to have your personal data erased and ask for deletion of your data under Article 17 of the GDPR.

#### 4. Right to restriction of processing

You have the right to restrict the processing your personal data under Article 18 of the GDPR.

### 5. Right to data portability

You have the right referred to in Article 20 of the GDPR to receive your personal data provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

## 6. Right to revoke the consent given under data protection law

You have the right referred to in paragraph 3 of Article 7 to withdraw your given consent based on the data protection provisions at any time. This does not affect the lawfulness of the processing based on consent before its withdrawal.

#### 7. Right to lodge a complaint with a supervisory authority

If you consider that the processing of personal data relating to you infringes the GDPR, you have the right referring to in Article 77 of the GDPR to complain to the supervisory authority against the processing of your personal data (in particular in the Member State of your habitual residence, place of work or place of the alleged infringement).

Please also note your right of objection under Article 21 GDPR:

a) In general: reasonable objection required

If the processing of personal data concerning you takes place in order

- to perform our overriding legitimate interest (legal basis: Article 6 (1f) GDPR) or
- to safeguard the public interest (legal basis: Article 6 (1e) GDPR), you are entitled to object to the processing at any time for reasons arising from your particular situation; this also applies to profiling based on the provisions of the GDPR.

In the event of objection, we will no longer process the personal data concerning you unless we can prove compelling grounds for processing which override your interests, rights and freedoms, or the processing is necessary for the establishment, exercise or defence of legal claims;

b) Special case of direct marketing: simple objection is sufficient

If the personal data concerning you are processed for the purpose of direct marketing,
you have the right to object at any time to the processing and without stating reasons;
this includes profiling to the extent that it is related to such direct marketing.

If you object to the processing for direct marketing purposes, the personal data concerning you will no longer be processed for these purposes.

#### Responsible for data processing:

GretaLuise Diamantschmuckmanufaktur GmbH Dieselstraße 8 31785 Hameln Phone: 017660405361 info@gretaluise.com

This document was created and is updated with technology from  $\underline{\mathsf{janolaw}}\ \mathsf{AG}.$