

## Privacy Policy – Naos GmbH

Last updated on: 05 Oct. 2017

### **1.) Scope:**

This Privacy Policy describes how we (Naos GmbH) and our affiliates (hereinafter referred to as “Naos”) use the personal information (hereinafter referred to as “data”) that you enter when you visit our websites, mobile platforms and applications (hereinafter referred to as “services”) or that is collected when you use these services.

These data are information that relates to natural persons. The data can be used to identify, contact or locate a person.

This Privacy Policy does not apply to websites, mobile platforms or applications from third parties.

These provisions are in line with Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data, on the free movement of such data, and on the repeal of Regulation 95/46/EC (General Data Protection Regulation), ABl. No. L 119 of 4 May 2016; hereafter referred to as “DSGVO”.

Changes to this Privacy Policy will be posted here in an amended version with an updated version date.

By using our services or by registering, you agree to the terms of the Privacy Policy and agree to the use of your data for the purposes mentioned.

You may revoke your consent at any time. We refer you to the contact details in section 8 for the exercise of this right of revocation.

### **2.) Collected data:**

Your data are collected in two ways. On the one hand manually through your inputs, and on the other hand automatically via technical systems (e.g. cookies).

Your data will be stored and processed by us until a request for deletion or your revocation of consent.

#### **a.) Manually entered data:**

When registering, using our services or ordering a newsletter, you may be asked to enter the following information:

- Name, phone number, email address
- label name, description, product images, product category, prices, if applicable,
- date of birth, address, UID, ID card ID, ID card picture, website, Facebook page, if applicable,
- payment information

b.) Automatically collected data:

The services automatically collect certain data required for optimal use:

- Log-in data (times etc.)
- IP address
- Information about the device used, the browser used and other technical identification features
- “Clickstream data,” date and time, and the content you visited or searched for, as well as the URL that referred you to our service.

c.) Cookies / Web beacons:

We use so-called “session cookies” and web beacons. Cookies are small computer files that we use to determine the frequency and manner of use of our services. Cookies help us, for example, to store the items in your shopping cart, suggest preferred products and save user settings for future visits. They also serve to implement certain functions of our services. These computer files (with your permission) are stored on your device’s hard drive so that our services automatically recognize your device the next time you use it. “Session cookies” are limited in time and are deleted when the browser is closed. “Persistent cookies” remain on your device until they are manually deleted. “Web Beacons” are graphics that allow analysis. Cookies and web beacons improve the use of our services for you. However, use is also possible without cookies or web beacons. But in this case all functions may not be usable.

“Third-party cookies” are cookies that are analyzed by third parties and used in our services. The following are links to the last known privacy policies of these third-party providers:

- Stripe <https://stripe.com/at/privacy>
- Facebook <https://www.facebook.com/privacy/explanation>
- Google Analytics <https://www.google.com/intl/en/policies/privacy/>
- Vero <https://www.getvero.com/privacy/>
- Mixpanel <https://mixpanel.com/privacy/>
- Cloudflare <https://www.cloudflare.com/security-policy/>

In our newsletters, web beacons are used to determine when the email is opened or the included links are followed. We use these data to improve our email service. If you delete the email, the web beacon will also be deleted automatically.

By using our services or by logging in, you consent to the storage, processing and transmission of data by means of cookies or web beacons for the aforementioned purposes.

You may refuse the use of cookies and web beacons and disable them. This is possible via the settings in your browser. You can also choose to receive a notification when a new cookie is set.

If you disable cookies, the use of our services is possible, but not all features may be usable.

#### d.) Web analysis:

We use a variety of third-party web analytics services. They use cookies and other technical devices that automatically collect and process your data.

This Privacy Policy does not apply to third-party processing. The data policies of these third parties are to be observed in this regard.

By using our services or logging in, you consent to the storage and processing of your data through web analytics services.

### **3.) Data regarding children:**

We do not collect or use data from minors (under 18 years of age). Our services are not directed to minors. Users are asked to enter their date of birth truthfully, on the basis of which a confirmation of the age of majority takes place.

### **4.) Use of data:**

We hereby inform you that we process and use the data collected by us and entered by you with your consent in accordance with the data protection act and the DSGVO for the following purposes:

- to personalize our services and provide the content you are looking for
- for the purpose of fulfilling the contract
- to contact you
- for the analysis of trends in usage
- to review our marketing strategy
- to manage your payments

- for data analysis
- for internal examinations
- to develop our product and our services
- to send you emails with information about your orders, other products or our services

We will also compare or merge your data for these purposes with those obtained from third parties.

For the above purposes, it may be necessary for data to be stored, transmitted or accessed on servers or facilities outside of your country of residence. When we transfer your data to such foreign servers or facilities, steps are taken to ensure privacy.

By using our services or logging in, you consent to the storage, transmission or processing of your data at servers or facilities outside your country of residence in which other privacy policies may apply than in your country.

#### **5.) Disclosure of data:**

Your data will not be sold to third parties or passed on in any other way without your prior notification. Of course, this does not include the inevitable forwarding of the data via host servers or your internet provider. By way of exception, we may disclose your data to an agency to perform regulatory or legal orders, to detect and prevent security threats or criminal offenses, or to protect or enforce the rights of Naos (or its employees).

By agreeing to this Privacy Policy, you consent to your data being forwarded in complete form to our payment service provider “Stripe Payments Europe, Ltd.” for payment processing.

Anonymous information may be disclosed by us to third parties for marketing, advertising or other purposes.

#### **6.) Privacy setting and your rights:**

You can use our services to manage your user account and also change the contact settings and make other privacy settings. We will inform you about changes or updates to our services.

According to Art. 15 GDPR, you have the right to information about the data that we have collected or processed regarding you. This includes the purposes of use, the recipient of the data and their origin.

According to Art. 16 GDPR, you have the option of requesting a correction of the existing data.

Under the provisions of Art. 17 GDPR, you have the right to request the deletion of the data.

Under the provisions of Art. 18 GDPR, you may request the restriction of the processing of your data.

You may request a written copy of the data stored about you (Art. 20 GDPR).

According to Art. 21 GDPR, you may object to data processing at any time or revoke your consent.

According to Art. 22 DSGVO, you have the right to object to automated decisions (profiling).

Should there exceptionally be a breach of the protection of your data (data breach), we will solve this problem immediately and inform you about it in accordance with Art. 34 GDPR.

To exercise the above rights, please contact us in writing (see item 8).

Furthermore, you have the right to lodge a complaint with the supervisory authority (data protection authority) in order to combat illegal data processing.

### **7.) Data security:**

To protect your data, they are processed in a pseudonymized form. We use a variety of security measures to ensure confidentiality and integrity in accordance with Art. 5 GDPR.

All data are processed over a secure network. We regularly check our services, databases and networks for vulnerabilities. We use encryption (SSL) for the transmission of the data. In order to make the use of our services as secure as possible, your user account is password protected.

**8.) Contact:**

Responsible party within the meaning of the DSGVO:

Naos GmbH  
Esslinggasse 16/24  
1010 Vienna  
AUSTRIA

Email: [office@naos.ventures](mailto:office@naos.ventures)  
Phone: 01/3050210