

## Privacy policy

Your personal data is safe and secure with us. This document explains what personal data we use, how and why we use them, your rights and other important information related to your personal data protection. As a trader, we act as the “controller” of your personal data.

The controller of processing customers’ data is: EMPIRE SYSTEMS, s.r.o., J.Kozáček 13 960 01 Zvolen, Slovak Republic. Business ID 36638072, tax registration No. 2022015644, VAT No. SK2022015644. Telephone No. +421 908 920 022, e-mail: [info@finecreator.com](mailto:info@finecreator.com).

## What kind of your personal data we may collect

When you register for our services, you may provide us with:

- your personal details, including your postal and billing addresses, email addresses, phone numbers and date of birth and title,
- your account login details, such as your username and the password that you have chosen,
- information about your online purchases (for example, what you have bought, when and where you bought it and how you paid for it),
- information about your online browsing behavior on our website and information about when you click on one of our adverts,
- information about any devices you have used to access our services (including the make, model and operating system, IP address, browser type and mobile device identifiers),
- personal data you provide about yourself anytime you contact us about our services (for example, your name, username and contact details), including by phone, email or post or when you speak with us through social media,
- details of the emails and other digital communications we send to you that you open, including any links in them that you click on,
- your feedback and contributions to customer surveys or reviews.

## Why we use your personal data

Processing your personal data allows us to:

- Process your orders and refunds. We need to process your personal data so that we can manage your customer account, provide you with the goods and services you want to buy and help you with any orders and refunds you may ask for.
- Manage and improve our website. We use cookies and similar technologies on our website to improve your customer experience. Some cookies are necessary so you should not disable these if you want to be able to use all the features of our website. You can disable other cookies, but this may affect your customer experience.
- Detect and prevent fraud or other crime. It is important for us to monitor how our Services are used to detect and prevent fraud, other crimes and the misuse of services. This helps us to make sure that you can safely use our services.

- Contact and interact with you. We want to serve you better as a customer, so we use personal data to provide clarification or assistance in response to your communications
- In order to resolve legal claims or disputes involving you or us.

## **Legal basis**

In relation to information mentioned above (how and why we use your personal data), our legal basis for processing your personal data is:

- Legal basis - contractual necessity – at the time we collect it (purchase & transaction data; contact details; profile details; delivery/collection details.)

We will not be able to provide you with your products or services if you do not provide us with this data.

- Legitimate interests - following fulfilment of your order for the other personal data in that section.

Our use of your personal data is based on our “legitimate interests” relates to service our customers’ needs, including delivering our products and services; to promote and market our products and services; to service your account, manage complaints and resolve any disputes; to understand our customers including their patterns, behaviors as well as their likes and dislikes; to protect and support our business, colleagues and customers; to prevent and detect anti-social behavior, fraud and other crime; to test and develop new products and services as well as improve existing ones.

## **Sharing personal data with partners and service providers**

When we share personal data with these companies, we require them to keep it safe, and they must not use your personal data for their own marketing purposes.

We work with carefully selected service providers that carry out certain functions on our behalf. These include, for example, companies that help us with technology services, storing, combining and analyzing data, processing payments, provide us with legal or other professional services as well as delivering orders.

We only share personal data that enable our service providers to provide their services.

## **Sharing personal data with other organizations**

We may share personal data with other organizations in the following circumstances:

- if the law or a public authority says we must share the personal data or for the administration of justice;
- if we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to others for the purposes of preventing fraud).

## **How we protect your personal data**

We apply physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personal data. We protect the security of your information while it is being transmitted by encrypting it. We use computer safeguards such as firewalls and data encryption to keep this data safe. We only authorize access to employees and trusted partners who need it to carry out their responsibilities. We regularly monitor our systems for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security. We will ask for proof of identity before we share your personal data with you.

Whilst we take appropriate technical and organizational measures to safeguard your personal data, it is important that you keep your login details and devices protected from unauthorized access.

## **Personal data transfer**

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by companies operating outside the EEA who work for us or for one of our service providers. If we do this we ensure that your privacy rights are respected in line with this policy.

The most common way we do this is to put in place a specific type of contract, a copy of this type of contract can be found here or through an approved scheme such as the Privacy Shield.

## **How long we use personal data for**

We will not keep your personal data longer than we need to, how long this is depends on several factors, including: why we collected it in the first place; how old it is; whether there is a legal/regulatory reason for us to keep it; whether we need it to protect you or us.

The usual period for keeping your personal data is 10 years, based on the legal requirements by Slovak laws.

## **Marketing**

We may send you relevant offers and news about our products and services, usually by email.

If you are already our customer, we may send you relevant marketing information without your prior consent, as it is our "legitimate interest".

You can change your marketing choices at any time online, by clicking the unsubscribe link in the footer of any marketing email, over the phone or in writing.

We also like to hear your views to help us to improve our services, so we may contact you for market research purposes. You always have the choice about whether to take part in our market research.

## Your Rights

You have the right to see the personal data we hold about you. This is called a Subject Access Request. If you would like a copy of the personal data we hold about you, please contact us.

In relation to your personal data, you also have the right to:

- have inaccurate information corrected: if you believe we hold inaccurate or missing information, please let us know and we will correct it.
- object to our use of it: general objection - we will then consider your objection to our use of your personal data. If on balance, your rights outweigh our interests in using your personal data, then we will at your request either restrict our use of it or delete it. Objection in relation to direct marketing - if you make such an objection, we will stop using your personal data for direct marketing purposes.
- restrict our use of it: there are several situations when you can restrict our use of your personal data, this includes (but is not limited to): you have successfully made a general objection, you are challenging the accuracy of the personal data we hold, we have used your personal data unlawfully, but you do not want us to delete it.
- have us delete it: there are several situations when you can have us delete your personal data, this includes (but is not limited to): we no longer need to keep your personal data; you have successfully made a general objection; you have withdrawn your consent to us using your personal data (and we do not have any other grounds to use it); we have unlawfully processed your personal data.
- have us transfer or "port" a copy of it: data portability is your right to obtain and reuse the personal information that you have provided to us for your own purposes across different services.
- complain to the data protection regulator: we'd like the chance to resolve any complaints you have; however you also have the right to complain to the Slovak data protection regulator (Office for Personal Data Protection of the Slovak Republic) about how we have used your personal data. Their website is <https://dataprotection.gov.sk>

## Cookies

We and our partners use cookies and similar technologies, such as tags and pixels, to personalize and improve your customer experience as you use our website and to provide you with relevant online advertising.

Cookies are small text files containing a unique identifier, which are stored on your computer or mobile device so that your device can be recognized when you are using a particular website or mobile app. They can be used only for the duration of your visit or they can be used to measure how you interact with services and content over time. Cookies help to provide important features and functionality on our website, and to improve your customer experience.

Cookies allow us to improve the way our website works so that we can personalize your experience and allow you to use many of their useful features. Cookies can help us to understand how our website is being used, for example, by telling us if you get an error

messages as you browse. These cookies collect data that is mostly aggregated and anonymous.

We use cookies to help us deliver online advertising that we believe is most relevant to you on our website and other organizations' website and using social media. Cookies used for this purpose are often placed on our website by specialist organizations. These cookies may collect information about your online behavior, such as your IP address, the website you arrived from and information about your purchase history or the content of your shopping basket. This means that you may see our adverts on our website and on other organizations' website. You may also see adverts for other organizations on our website.

Cookies can tell us if you have seen a specific advert, and how long it has been since you have seen it. This information allows us to measure the effectiveness of our online advertising campaigns and control the number of times you are shown an advert.

We also use cookies to measure the effectiveness of our marketing communications, for example by telling us if you have opened a marketing email that we have sent you.

You can use your browser settings to accept or reject new cookies and to delete existing cookies. You can also set your browser to notify you each time new cookies are placed on your computer or other device. You can find more detailed information about how you can manage cookies through your browser's help function.

If you choose to disable some or all cookies, you may not be able to make full use of our website. For example, you may not be able to add items to your shopping basket, proceed to checkout, or use any of our products and services that require you to sign in.