

## Privacy statement Eleni Meraki

### Introduction

Eleni Meraki takes your privacy very seriously and shall handle your personal data with the utmost security and care. In this Privacy Statement you will learn how we handle your data as well as learn about your rights concerning our processing of your data. We advise that you read this Privacy Statement thoroughly. Should you have any questions or remarks, please contact us at [info@elenimeraki.com](mailto:info@elenimeraki.com).

### Who is Eleni Meraki?

Eleni Meraki is the limited trade company, Eleni Meraki Ltd., with registered office at (4500 ) Panagyurishte listed in Bulgaria with the VAT number BG205428380.

Eleni Meraki is as the controller ultimately responsible with regard to the processing of your personal data.

### How does Eleni Meraki use your personal data?

Underneath you will find an overview of the purposes for the processing of your personal data. You will also find a specification of which data Eleni Meraki uses for that specific purpose, the legal justification, and the amount of time Eleni Meraki keeps this data. For clarity's sake, we have categorised the purposes.

#### *Services, customer management and financial administration*

Purpose:	Financial administration
Information:	Company name, Billing address, Bank details, Outstanding balance
Legal basis:	Necessary for the performance of a contract
Storage period:	As long as necessary for this purpose

Purpose:	Services
Information:	Home address, Email, Customer file data, Financial data, Data necessary to

provide the service, Data generated by the service

Legal basis: Necessary for the performance of a contract

Storage period: As long as necessary for this purpose

Purpose: Handling complaints

Information: Home address, Email, Customer file data, Financial data, Data necessary to provide the service, Data generated by the service

Legal basis: Necessary for the performance of a contract

Storage period: As long as necessary for this purpose

Purpose: Invoicing

Information: Home address, Email, Customer file data, Financial data, Data necessary to provide the service, Data generated by the service

Legal basis: Necessary for the performance of a contract

Storage period: As long as necessary for this purpose

### *Marketing*

Purpose: Direct marketing

Information: Name, Home address, Email, Click behaviour, Online behaviour, Interest in

	a product, Social media account, Order history Legitimate interests
Legal basis:	Legitimate interests
Interest concerned:	Commercial interests
Storage period:	As long as necessary for this purpose
Purpose:	Affiliate marketing
Information:	Name, Home address, Email, Click behaviour, Online behaviour, Interest in a product, Social media account, Order history Legitimate interests
Legal basis:	Legitimate interests
Interest concerned:	Commercial interests
Storage period:	As long as necessary for this purpose
Purpose:	Newsletter
Information:	Name, Home address, Email, Click behaviour, Online behaviour, Interest in a product, Social media account, Order history Legitimate interests
Legal basis:	Legitimate interests
Interest concerned:	Commercial interests
Storage period:	As long as necessary for this purpose
Purpose:	Retargeting
Information:	Name, Home address, Email, Click behaviour, Online behaviour, Interest in

	a product, Social media account, Order history Legitimate interests
Legal basis:	Legitimate interests
Interest concerned:	Commercial interests
Storage period:	As long as necessary for this purpose
Purpose:	Social media marketing
Information:	Name, Home address, Email, Click behaviour, Online behaviour, Interest in a product, Social media account, Order history Legitimate interests
Legal basis:	Legitimate interests
Interest concerned:	Commercial interests
Storage period:	As long as necessary for this purpose
Purpose:	Behavioural targeting
Information:	Name, Home address, Email, Click behaviour, Online behaviour, Interest in a product, Social media account, Order history Legitimate interests
Legal basis:	Legitimate interests
Interest concerned:	Commercial interests
Storage period:	As long as necessary for this purpose
Purpose:	Loyalty program
Information:	Name, Home address, Email, Click behaviour, Online behaviour, Interest in

a product, Social media account, Order history Legitimate interests

Legal basis:

Legitimate interests

Interest concerned:

Commercial interests

Storage period:

As long as necessary for this purpose

*Website*

Purpose:

Website analytics

Information:

Online behaviour, Location

Legal basis:

Legitimate interests

Interest concerned:

Commercial interests

Storage period:

As long as necessary for this purpose

Purpose:

Account

Information:

Name, Address, Email, Username, Password, User ID, Message content

Legal basis:

Necessary for the performance of a contract

Storage period:

As long as necessary for this purpose

Purpose:

Submitting reviews or messages

Information:

Name, Address, Email, Username, Password, User ID, Message content

Legal basis:

Necessary for the performance of a contract

Storage period:

As long as necessary for this purpose

### **How did we obtain your personal data?**

Eleni Meraki has obtained your data because you have provided this data to us.

### **What are your rights?**

Under the European General Data Protection Regulation you have a number of rights with regard to your data and the processing thereof:

#### **Access**

You may access your personal information and make any necessary changes in your account. If you would like to see which personal data Eleni Meraki has obtained about you, you may exercise your right of access by submitting a request to Eleni Meraki.

#### *Making changes*

If you wish to make changes to the personal information that you have seen as a result of a request for access and you are unable to make the changes yourself in your account, you may request that Eleni Meraki makes these changes for you. You may request that Eleni Meraki modifies, corrects, supplements, erases or shields your information.

#### *Restriction of processing of personal data*

You also have the right, under certain conditions, to ask Eleni Meraki to restrict the processing of your personal data.

#### *Right to object*

If processing of your data takes place on the grounds of 'legitimate interest' by Eleni Meraki or a third party, you have the right to object to that processing.

#### *Portability of data*

You have the right to obtain your personal data from Eleni Meraki. Eleni Meraki will provide this in a structured and commonly used format, which can easily be opened using commonly used digital systems.

### *Withdrawing consent*

When the legal basis for a particular processing is your explicit consent, you have the right to withdraw that consent. This does not affect past processing, but does mean that we will no longer be allowed to process this data in the future. It may also result in Eleni Meraki no longer being able to provide you with certain services.

### *Response from Eleni Meraki*

A request can be sent to [info@elenimeraki.com](mailto:info@elenimeraki.com). Eleni Meraki will comply with your request as soon as possible and in any case no later than one (1) month after Eleni Meraki has received such a request. If Eleni Meraki rejects your request, we will indicate in our reply why the request was rejected.

### *Recipients of your personal data*

Your data may be transmitted to:

- Data processors
- Parties that are involved in the execution or fulfilment of an agreement between you and Eleni Meraki
- External consultants

It is possible that Eleni Meraki is required to submit your data to a third party, for example to fulfil a legal obligation.

### **Transfer to third countries or international organisations**

It may be necessary, for instance for technical and operational reasons, to transfer your (personal) data to affiliates of Eleni Meraki located outside the European Economic Area. Due to the possibility that the regulations in the area of privacy protection do not offer the same protection as within the European Economic Area, Eleni Meraki will use the Privacy Shield or the EU Model Clauses to protect your privacy as much as possible. If that is not possible, Eleni Meraki will ask your consent to transfer your (personal) data to countries that do not maintain an adequate protection level. You may withdraw your consent at any time.

### **What are cookies and how does Eleni Meraki use them?**

Cookies are small pieces of (text) information that are sent to your browser when you visit the website of Eleni Meraki and then stored on the hard disk or in the

memory of your device. The cookies placed via Eleni Meraki's website cannot damage your device or the files stored on it. With 'cookies', we also mean comparable techniques collecting information, such as device fingerprinting.

#### **Can changes be made to this Privacy Statement?**

This Privacy Statement is subject to changes. We therefore advise you to regularly read the Privacy Statement for any such changes.

#### **Questions, remarks, and complaints**

If you have any questions regarding this Privacy Statement or the way in which Eleni Meraki uses your data, you can send an e-mail to [info@elenimeraki.com](mailto:info@elenimeraki.com). If you have a complaint about the way your data is processed, please send an e-mail to [info@elenimeraki.com](mailto:info@elenimeraki.com). Furthermore, you always have the right to contact the competent national data protection authority.