

PRIVACY POLICY

Purpose and accountability

This Privacy Policy describes how we process personal data collected on our websites, mails you may receive from us and online platforms and through our associated webpages, functions and content (hereinafter referred to as the “Websites” or “Service”) and describes the scope and purpose of these activities. This Privacy Policy applies to all situations, regardless of which domain, system, platform or device (e.g. desktop or mobile) the Websites are accessed on.

The provider of the Websites, and the party responsible for data protection and privacy issues in regard to the Websites, is the company SONS OF A BIT, SL., C/ Campus Universitario de Espinardo, 7, 30100 Murcia, Spain, e-mail: kluestinfo@sonsofabit.com (hereinafter referred to as “we”, “us” and “our”).

The term “User” used hereinafter refers to all visitors to our Websites.

The terminology used within this Privacy Policy, such as “users”, is gender-neutral.

General information on data processing and legal basis

The personal data of the users processed in the context of our Service include inventory data (e. g., names and addresses of customers), usage data (e. g., the websites visited, interest in our products) and content data (e. g., entries in the contact form).

The term “user” covers all categories of data subjects concerned. They include our customers and other visitors to our website. The term “user” covers all categories of data subjects concerned. They include our customers and other visitors to our website.

All the personal User data we collect is processed in accordance with the relevant data protection regulations. That means we only process User data where this is permitted by law. This applies, in particular, if data processing is required or prescribed by law in order to furnish our contractual services (e.g. to process orders) and provide online services, or if the User has provided their consent, or if it is for the purposes of our legitimate interests (i.e. our interest in analyzing, optimizing and running our Websites in a secure and commercially viable manner within the meaning of Art. 6 (1) f. of the General Data Protection Regulation (GDPR)).

In regard to the processing of personal data on the basis of the General Data Protection Regulation (GDPR), please note that the legal basis for the data subject giving consent is Art. 6 (1) a. and Art. 7 GDPR, the legal basis for processing data in order to perform our contractual services and discharge our contractual obligations is Art. 6 (1) b. GDPR, the legal basis for processing data in order to comply with our legal obligations is Art. 6 (1) c. GDPR, and the legal basis for processing data for the purposes of our legitimate interests is Art. 6 (1) f. GDPR.

Security safeguards

We apply state-of-the-art organizational, contractual and technical security measures to ensure compliance with the provisions of data protection legislation and thereby to protect the data we process against accidental or intentional manipulation, loss, destruction or access by unauthorized persons.

These security measures include, in particular, the encrypted transmission of data between your browser and our server.

Forwarding of data to third parties and third-party providers

Data is only forwarded to third parties to the extent permitted by law. We only forward User data to third parties if this is necessary e.g. for billing purposes, or for other purposes if the User data is required to perform a contract to which the data subject is party.

In cases where we employ subcontractors to furnish our services, we ensure appropriate legal safeguards are in place and take appropriate technical and organizational steps to ensure that personal data is protected in compliance with applicable statutory requirements.

Insofar as content, tools or any other resources from other providers (hereinafter referred to as “third-party providers”) are employed within the scope of this Privacy Policy and said third-party providers have their registered headquarters in a third country, it should be assumed that data will be transferred to the country of domicile of the third-party provider. The term third country refers to countries in which the GDPR does not constitute directly applicable legislation, i.e. essentially countries outside the EU or the European Economic Area. Data shall be transferred to third countries if an adequate level of data protection is in place, if the User has provided their consent, or if this transfer is permitted by law in any other way.

Contractual services, Registration, Processing of user profiles

We process inventory data (e. g., names and addresses as well as contact data of users) for the purpose of fulfilling our contractual obligations and services in accordance with Art. 6 Para. 1 lit b). GDPR.

Users must, if offered and required for the use of our service, create a user account, in particular by viewing their data and services used. Within the scope of registration, the necessary compulsory information is communicated to the users. The user accounts are not public and cannot be indexed by search engines. If users have terminated their user account, their data will be deleted with regard to the user account, subject to their retention being necessary for commercial reasons in accordance with Art. 6 (1) c. GDPR.

If the user accounts are created on other platforms, the terms of use and data protection regulations of the respective providers apply.

Within the scope of registration and renewed registrations as well as the use of our online services, we store the IP address and the time of the respective user action. The storage is based on our legitimate interests, as well as the user’s protection against misuse and other unauthorized use. As a matter of principle, this data will not be passed on to third parties unless it is required for the pursuit of our claims or there is a legal obligation pursuant to Art. 6 (1) c GDPR.

We process the usage data of our users(e. g., the visited websites of our online offer, interest in our products and orders) in a user profile based on our legitimate interests in advertising and market research purposes in accordance with Art. 6 (1) f. of the GDPR, in order to suggest to the customer, e. g. product information based on the services they have used up to now by insertion within our online offer or to analyze the development of our business operations.

Contacting us

If a User gets in touch with us via the contact form or by email, we process the User’s details in order to respond to and deal with the query or request.

Collection of access data (logfiles)

For the purposes of our legitimate interests, we collect data every time the server on which the service is located is accessed. This data is collected in the form of server log files. These access logs include the name of the webpage and/or file accessed by the User, the date and time of access, the amount of data transferred, notification of successful retrieval, details of the web browser used (including the version), the User's operating system, the referrer URL (of the previous page linking to our website), the IP address and the requesting provider.

Log file information is retained for security reasons (e.g. to detect improper use or fraud) for a maximum of seven days before being deleted. Data that is to be retained as evidence shall be excluded from deletion until the relevant case has been finalized.

Cookies & reach measurement

Cookies are data packets that are transferred from our web server or third parties' web servers to the User's web browser and stored there for later retrieval. Cookies may comprise small files or any other kinds of information storage. When the user browses the same website in the future, the data stored in the cookie can be retrieved by the website to notify the website of the user's previous activity. We may use so-called "session cookies", which information are only stored for the duration of the current visit to our Website (e. g. to enable your login status or the shopping cart function and thus the use of our online offer at all). A session cookie stores a randomly generated unique identification number, a so-called session-ID. A cookie also contains information about its origin and the storage period. These cookies cannot store any other data. Session cookies are deleted when users have finished using our online offer and, for example, log out or close the browser.

This Privacy Policy also explains to Users how we use cookies in a pseudonymized manner to measure reach.

If the User does not wish cookies to be stored on their computer, we hereby request that they disable the relevant option in their browser settings. Stored cookies can be deleted in the browser settings at any time. Disabling cookies may prevent the user from enjoying the full functionality of these Websites.

Users can block cookies that are used for tracking and online advertising by visiting the opt-out page of the network advertising initiative (<http://optout.networkadvertising.org/>) and also by managing their preferences on the U.S. website <http://www.aboutads.info/choices> or the European website <http://www.youronlinechoices.com/uk/your-ad-choices/>.

Newsletter and commercial communication

With the following explanations we would like to inform our users about the contents of our newsletters as well as other types of business e-mails and electronic mail (short "newsletter") as well as the registration, dispatch and statistical evaluation procedures and your rights of objection. By subscribing to our newsletter, you declare your agreement with the reception and the described procedures. The legal basis of your consent is Art. 6 (1) a, Art. 7 GDPR.

Contents of the newsletter: We send out newsletters, e-mails and other electronic notifications with advertising information (hereinafter referred to as "newsletters") only with the consent of the recipients or a legal permission. Insofar as the contents of a newsletter registration are specifically described in detail, they are decisive for the user's consent. In addition, our newsletters contain the information on our Service, offers, promotions and our company.

Double opt-in and logging: The registration for our newsletter is done in a so-called double opt-in procedure. This means that users will receive an e-mail after the registration, in which users will be asked to confirm your registration. This confirmation is necessary so that no one can register with other e-mail addresses. The subscriptions to the newsletter are logged in order to be able to prove

the registration process according to the legal requirements. This includes saving the logon and confirmation time as well as the IP address. The changes to your data stored by the shipping company are also logged.

Registration data: To subscribe to the newsletter, it is sufficient to enter an e-mail address. Further, we ask you to enter a name or your company and area of business in the newsletter to address you and to customize the contents of the newsletter to your interests/branch.

Cancellation/Revocation – Newsletter recipients can cancel the receipt of our newsletter at any time, i.e. revoke their consent. Newsletter recipients will find a link to unsubscribe from the newsletter at the end of each newsletter. By unsubscribing from the newsletter, the personal data will be insofar deleted, unless their storage is legally required or justified, and their processing in this case is limited to these exceptional purposes only.

Google Analytics

For the purposes of our legitimate interests (i.e. our interest in analyzing, optimizing and running our Websites in a commercially viable manner within the meaning of Art. 6 (1) f. of the General Data Protection Regulation (GDPR), we use Google Analytics, a web analytics service provided by Google Inc. (“Google”). Google uses cookies. The information generated by cookies concerning the use of the Websites by the User will generally be transmitted to and stored by Google on servers in the USA.

Google is certified under the Privacy Shield framework which offers a guarantee of compliance with European data protection legislation (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).

Google will use this information on our behalf for the purpose of evaluating use of our Websites by the User, compiling reports on activity on the Websites, and providing us with other services relating to the use of the Websites and use of the Internet. This process may involve creating pseudonymized usage profiles of Users from the processed data.

We use Google Analytics to display the ads placed by Google and its partners within advertising services, only to those users who have shown an interest in our online offer or who have particular characteristics (e. g. interests in certain topics or products determined by the websites visited) that we transmit to Google (so-called Remarketing or Google Analytics audiences). With the help of remarketing audiences, we would also like to ensure that our advertisements are in line with the potential interest of the users and do not have a nuisance effect.

We only use Google Analytics with IP anonymization enabled. That means Google truncates the User’s IP address within Member States of the European Union and in other countries that are party to the Agreement on the European Economic Area. Only in exceptional cases is the full IP address transmitted to a Google server in the USA and truncated there.

The IP address transmitted by the User’s browser is not associated with any other data held by Google. Users can prevent cookies from being installed on their computer by adjusting their browser settings accordingly. Users can also prevent Google from collecting data generated by cookies concerning their use of the Websites and can prevent Google from processing this data by downloading and installing a browser plug-in from the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.

For more information on how Google uses data and how to opt out, please refer to Google’s websites: <https://www.google.com/intl/en/policies/privacy/partners> (“How Google uses data when you use our partners’ sites or apps”), <http://www.google.com/policies/technologies/ads> (“How Google uses data in advertising”), <http://www.google.com/settings/ads> (“Control the information Google uses to show you ads”).

Integration of third-party services and content

For the purposes of our legitimate interests (i.e. our interest in analyzing, optimizing and running our Websites in a commercially viable manner within the meaning of Art. 6 (1) f. of the GDPR), we use third-party content and service delivery services on our Websites in order to incorporate content and services such as videos and fonts, for example (hereinafter jointly referred to as “content”). The third-party provider of this content may require the User’s IP address in order to send the content to the browser of the respective User. In other words, the IP address is required to display this content. We endeavor only to use such content where the respective provider uses the IP address exclusively to deliver said content. Third-party providers may additionally use “pixel tags” (invisible image files, also known as web beacons) for statistical or marketing purposes. Pixel tags can be used to analyze information such as the number of visitors accessing the pages of this website. The pseudonymized information may additionally be stored on User devices in the form of cookies. This information includes technical information on the browser and operating system, referring websites, time spent on the website, and further details on how Users make use of our Websites, plus it can also be combined with comparable information from other sources.

The list below provides an overview of third-party providers and their content as well as links to their privacy policies, which contain further information on data processing and opt-out mechanisms, some of which have already been discussed here:

1. Maps from the “Google Maps” service provided by the third-party company Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Privacy policy: <https://www.google.com/policies/privacy/>; opt-out: <https://www.google.com/settings/ads/>.
2. External fonts provided by the third-party provider Google, Inc., <https://www.google.com/fonts> („Google Fonts“). The integration of the Google fonts is performed by a request on Google’s server (usually in the USA). Privacy policy: <https://www.google.com/policies/privacy/>, opt-out: <https://www.google.com/settings/ads/>.
3. Videos on the “YouTube” platform provided by the third-party company Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Privacy policy: <https://www.google.com/policies/privacy/>; opt-out: <https://www.google.com/settings/ads/>.
4. Notes on Google, Inc.: Google is certified under the Privacy Shield framework which offers a guarantee of compliance with European data protection legislation (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).

User rights

Users have the right to obtain information free of charge on the personal data we have collected about them. In addition, Users have the right to correct any inaccurate data, restrict the processing of their personal data or delete it, and, where applicable, assert their right to data portability. Users also have the right to submit a complaint to the relevant supervisory authorities if they suspect that data has been processed unlawfully.

Users can also withdraw any consent they may have given. Such a revocation of consent shall have future effect only.

Deletion of data

The data stored by us is deleted once it is no longer required for the designated purpose and provided that we have no statutory obligation to retain said data. In the event User data is not deleted because it is required for other purposes permitted by law, then its processing shall be restricted accordingly, i.e. the data shall be blocked and no longer processed for other purposes. This applies, for example to User data that must be retained due to commercial or tax requirements.

Right to object

Users can choose to opt out of the future processing of their personal data at any time in accordance with statutory provisions. This right to object applies in particular to the processing of data for the purposes of direct advertising.

Amendments to this Privacy Policy

We reserve the right to amend this Privacy Policy at any time to reflect changes in the legal situation or changes relating to the service or data processing. This only applies to declarations concerning data processing, however. If Users' consent is required or if the Privacy Policy contains provisions for the contractual relationship with the Users, the changes shall only be made with the consent of the Users.

Users are requested to check the Privacy Policy on a regular basis to keep up-to-date with its content.

Last updated: September 2018