

# Privacy Policy and Information about the Processing of your Personal Data

## 1. What is a Privacy Policy?

1.1. In our privacy policy, we explain who is responsible for the processing of personal data that occurs when you order goods or services from us. We also describe which elements of personal data about you is being processed when you provide information to us in various situations, how we process personal data, why we do so, and what legal support we rely on to justify the processing, as well as explaining which third parties may be processing your personal data about you so that we will be able to provide the goods and services you have ordered. You also receive information about your rights concerning our processing of your personal data, and how to proceed in order to exercise your rights.

## 2. Important terms and concepts

2.1. Here are some important terms and concepts that may be helpful to gain a fuller understanding our privacy policy:

- a) “Personal Data” means any information relating to an identified or identifiable natural person. An identifiable natural person is an individual who can be identified directly or indirectly with reference to an element of data, for instance name, an identification number such as a Swedish personal ID number, information about location, online identifiers such as an IP address, or one or more factors specific to the physical, physiological, genetic, psychological, financial, cultural or social identity of the individual.
- b) “Processing” means a measure or combination of measure concerning personal data, such as the collection, registration, organising, structuring, storage, adaptation or modification, production, reading, usage, disclosure by transfer, dissemination or provision by other means, adjustment or compilation, limitation, erasure or destruction.
- c) “Zinzino Partner” means a person or company who is registered at Zinzino as a reseller of Zinzino’s products.

## 3. Who is responsible for the processing?

3.1. *Zinzino Sverige AB* is the data controller in relation to the processing. In this text, *Zinzino Sverige AB* is referred to as “We” and you who order goods and services from us, or who have shown an interest in ordering goods and services from us, are referred to as “You”.

## 4. Generally about our processing of personal data

4.1. We will only process the personal data about you that is necessary for the purposes as specified in Section 5 below. In addition, we have procedures for how we store and remove identifying information from personal data in order to continuously ensure that your personal data is sufficient and relevant at all times.

### *Where the data is obtained from*

4.2. The information is collected directly from you at the time of purchase, and you will need to provide the information we ask for in the order form in order that we will be able to process your order. Therefore, providing the information we request is necessary so that we will be able to enter into an agreement with you.

## 5. Which personal data we process about you and the reasons for the processing, and related matters

### *We process personal data to be able to deliver goods and services to you*

5.1. When you order goods or services from us, you enter into an agreement with us. Therefore we will process all of the personal data you provide to us in connection with placing the order, such as your name, civil registration, number, address, e-mail address and telephone numbers, and the details of how you contacted us, such as IP address, in order to fulfil the obligations of the agreement with you – also in order to process your order and/or your subscription, deliver goods and services to you that have been ordered, manage the payment for them, and deal with and fulfil any customer service obligations in respect to the goods you purchase. These types of personal data that are provided in connection with placing orders is referred to as “Ordering Data.”

- 5.2. The Ordering Data we collect so that we can process and otherwise deal with your orders will be processed in order to fulfil the agreement with you during the time your Customer Relationship with us remains in effect, and during the time period for any warranty commitments on our part.

*We process personal data when others use our website*

- 5.3. When using our website, we will automatically collect and process technical information including IP address, login information, type and version of operating system and device, time settings, selected language, cookies, etc., and time expended for planning orders, keystrokes, etc. These types of personal data that is provided in connection with using our website we refer to as “User Data.”
- 5.4. Your User Data is processed in order to provide you with sign in rights and use your user account on our website, ensure your identity and age, have accurate and up-to-date information about you, so that you will be able to track and manage your orders in process, to manage your choices in regards to settings and payment details, to assist with further developing and improving our website and the IT systems used to provide it, as well as to be able to deliver the goods and services to you that you have ordered, in accordance with our General Terms and Conditions. The User Data about you we have collected will be saved for the same period of time as the Ordering Data about you we process.

*We process personal data to facilitate your membership in the Zinzino4 Free programme and to report the commissions, etc. to our partners*

- 5.5. We also process your personal data and information about what you have ordered and paid to manage your membership in the “Zinzino4Free” program, and may also process your personal data in order to be able to provide a report to our Zinzino Partners concerning commissions and points regarding the sales to you if you have been referred to us by or otherwise chosen to be associated with a Zinzino Partner.
- 5.6. The personal data processed within the framework of the “Zinzino4Free” programme is processed for as long as you choose to remain as a member of the customer club, for the purpose of fulfilling our membership agreement.
- 5.7. The information that is processed in order to be able to report commissions and points to our Zinzino Partners regarding the sales to you is processed based on a balancing of interests, where we assess that our interest in fulfilling our reporting obligation to the Zinzino Partners who are involved is such a legitimate interest that means that the processing is permissible. This data will be processed for a maximum of 12 months after the customer relationship has ended.

*We process personal data in order to be able to market our goods and services to you*

- 5.8. Finally, we process your personal data for marketing purposes, in other words in order to be able to promote and market our products to you.
- 5.9. Even when the data is processed for marketing purposes, it is based on a balancing of interests where we assess that our interest in marketing our products to you is such a legitimate interest that means that the processing is permissible. Such processing for marketing purposes will take places for a maximum of one year after our customer relationship with you has ended.

*Data we need to process as required by law*

- 5.10. In addition to the above, we may process your personal data to fulfil legal obligations, for instance the obligation to keep accounting records, to the extent and during the time period as specified by law.

## **6. Consent to certain processing and “the right to be forgotten”**

- 6.1. You may, from time to time, also be offered the opportunity to provide us with additional information about you, other than what is stated above, via our website, such as uploading a picture of you or participating in promotions, etc. Any and all information you provide to us and which will not be used for any of the other purposes as stated above will be processed after obtaining your consent. At the present time, this applies to a) pictures you upload to our website, until you withdraw your consent or until your profile with us is deleted (for instance due to that long period of time has passed since your last order, and b) in regard to promotional campaigns, until the winner is announced and the prize in the campaign is given out. By participating in promotions with us, you also agree that your name and picture will be publicly publicised on our website, if you are one of the winners of the promotional campaign.

*Your right to revoke your consent*

- 6.2. With regards to your personal data and during the time your personal data is being processed *only* based on your consent, you may withdraw your consent at any time by contacting us. If you withdraw your

consent in such case, the personal data we process based on only your consent will be deleted (the “right to be forgotten”). If the data is also being processed for other purposes, the data will instead no longer be processed for the purposes where the processing is based on your consent.

## **7. How we will process your information and who it can be provided to**

- 7.1. The personal data we process about you will primarily be processed internally within Zinzino and by companies in the same Group as us, however in relevant parts may be provided to those partners who are to receive a commission or points on the sales to you, as well as to companies that help us with the production and distribution of products and services, such as postal and parcel delivery companies and other vendors/suppliers. We also retain subcontractors, for example those providing customer service systems, that will receive access to your personal data as a personal data processor on our behalf.
- 7.2. Zinzino will not disclose your personal data to other companies for marketing purposes.

## **8. Where is your personal data stored?**

- 8.1. Your personal data is stored primarily in IT infrastructure provided by one of our personal data processors. The personal data is processed and stored primarily within the EU/EEA, with the exceptions set out below.

## **9. Data processed outside of the EU/EEA**

- 9.1. Zinzino retains personal data processors for the management of customer service systems, as well as suppliers and distributors outside of the EU/EEA. Therefore in connection with this processing, your personal data will be transferred to the United States and Canada.
- 9.2. With regard to Canada, the EU Commission has decided that there is an adequate level of protection for your personal data, which is why the processing is considered secure. Regarding the processing in the United States, there is no decision yet concerning adequate levels of protection. Instead, we have signed an agreement with the companies that will process your personal data as a processor on our behalf, or as a joint data controller (the latter applies to Zinzino’s Group companies in the United States) in accordance with the standard agreement clauses developed by the EU Commission which are regarded as ensuring a sufficient level of protection for the data. If you so desire, you can obtain a copy of the agreement with these companies by contacting us. For more information concerning the EU’s standard contract clauses, see e.g. [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_sv](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_sv).

## **10. Your rights concerning access to the information we process**

- 10.1. You are entitled to receive notice of and information about the data we process about you, and a copy of the data (without charge), by contacting us. However for any additional copies, over and above the one you are entitled to receive free of charge, we will charge an administrative fee corresponding to the costs incurred in order to produce and provide you the additional copies.

## **11. Your right to correction of incorrect data and deletion of data**

- 11.1. If you believe that any data about you is incorrect, you are entitled to request that the information be corrected or deleted. If such a situation arises, please contact us and tell us what information you think is incorrect and tell us why it should be corrected or deleted.

## **12. Your right to object to certain processing**

- 12.1. **You are entitled to object to the part of our processing of your personal data that is based on the “balancing of interests.” For more information which processing this applies to, refer to sections 5.7 and 5.9 above.**
- 12.2. **In regards to the processing of personal data that is done for marketing purposes, you may make objections to this at any time. If you do so, your personal data will no longer be processed for marketing purposes. If you make objection relating to other uses, we will consider it against the reasons we have to continue with the processing of your personal data.**
- 12.3. **Contact us if you want to make any objections to any part of the processing that takes place based on a balancing of interests.**

## **13. Your right to a restriction or limitation**

- 13.1. You may also request that the processing of your personal data be limited (frozen) if in your opinion the personal data we are processing is not correct, if the processing would be unlawful/illegal, if we no longer

need to retain or process the data but if you, despite this, still need them in order to be able to make a legal claim or if you have opposed the processing, and until we have dealt with your objections.

**14. Your rights to data portability**

- 14.1. You are entitled to obtain the personal data about you that you provided to us in a structured, widely-used and machine-readable format in order to be able to transfer this information to another data controller. This applies only to the information you yourself have provided to us, and only when the processing is based on your consent or for the purpose of being able to fulfil an agreement with you. If you want to obtain your personal data in this manner, please contact us.

**15. Your right to lodge a complaint**

- 15.1. At Zinzino, we take your privacy very seriously. We are therefore very happy that your personal data is always processed in a proper and secure manner. If you have any comments about our handling or processing of personal data, please feel free to contact us.
- 15.2. If you believe that our personal data processing is incorrect in some manner, you are entitled to file a complaint to the Swedish Integritetsskyddsmyndigheten/Protection of Privacy Authority (formerly the Datainspektionen), which is the regulatory authority for these matters. More information is available at [www.datainspektionen.se](http://www.datainspektionen.se).

**16. Feel free to contact us**

- 16.1. Our contact details are: Zinzino Hong Kong Ltd (BRN 65356238), Level 12 - One Peking, 1 Peking Road, Tsim Sha Tsui, Hong Kong. You can reach our Customer Support at +852 5808 2155 or via e-mail at: [customer.hk@zinzino.com](mailto:customer.hk@zinzino.com).

## 隐私政策及有关您个人数据处理的信息

### 1. 什么是隐私政策？

- 1.1. 在我们的隐私政策中，我们解释了谁负责处理您向我们订购商品或服务时产生的个人数据。我们还会说明，当您在各种情况下向我们提供信息时有关您的哪些个人数据元素正被处理、我们如何处理个人数据、我们为什么这样做以及我们依靠何种法律支持来证明处理的合理性，并说明哪些第三方可能正在处理有关您的个人数据，以便我们能够提供您所订购的商品及服务。您还将收到有关我们处理您个人数据的权利和如何继续进行以行使您的权利的信息。

### 2. 重要术语和概念

- 2.1. 以下是一些重要的术语和概念，可能有助于您更全面地了解我们的隐私政策：
- d) “个人数据”是指与已识别或可识别的自然人有关的任何信息。可识别的自然人是指可以参考数据元素被直接或间接识别的个人，例如，姓名、身份证号码（如瑞典个人身份证号码）、位置信息、在线标识符（如 IP 地址）或一个或多个特定于个体的物理、生理、遗传、心理、经济、文化或社会身份的因素。
  - e) “处理”是指有关个人数据的一种措施或多种措施的组合，例如，收集、登记、组织、构造、储存、改编或修改、制作、阅读、使用、通过传输披露、传播或以其他方式提供、调整或汇编、限制、删除或销毁。
  - f) “Zinzino 合作伙伴”是指在 Zinzino 注册为 Zinzino 产品经销商的个人或公司。

### 3. 谁负责处理？

- 3.1. *Zinzino Sverige AB* 是与处理相关的数据控制方。在本文中，*Zinzino Sverige AB* 被称为“我们”，而向我们订购商品和服务的或有兴趣从我们订购商品和服务的被称为“您”。

### 4. 关于我们处理个人数据的一般情况

- 4.1. 我们将仅出于以下第 5 节中规定的目的来处理有关您的个人数据。此外，我们还制定了有关如何存储和删除个人数据中的识别信息的程序，以持续确保您的个人数据在任何时候都是充分和相关的。

#### *数据从何处获得*

- 4.2. 这些信息是在购买时直接从您那里收集的，您将需要在订购单中提供我们要求的信息，以便我们能够处理您的订单。因此，提供我们要求的信息是必要的，这样我们才能与您达成协议。

### 5. 我们处理有关您的哪些个人数据、处理原因以及相关事宜

#### *我们处理个人数据以便能够为您提供商品和服务*

- 5.1. 当您向我们订购商品或服务时，即与我们达成协议。因此，为了履行与您的协议义务，也为了处理您的订单和/或订购、向您提供已订购的商品和服务、管理它们的付款以及处理和履行与您购买的商品有关的任何客户服务义务，我们将处理您在下单时提供给我们所有个人数据，如您的姓名、民事登记、号码、地址、电子邮件地址和电话号码，以及您与我们联系的详细信息，如 IP 地址。与下单有关的这些个人数据类型被称为“订购数据”。

- 5.2. 我们将在您与我们的客户关系有效期间以及在我们作出任何担保承诺期间处理我们为处理或以其他方式处理您的订单而收集的订购数据，以履行与您的协议。

#### *当他人使用我们的网站时，我们会处理个人数据*

- 5.3. 在使用我们的网站时，我们会自动收集和處理技术信息，包括 IP 地址、登录信息、操作系统和设备的类型和版本、时间设置、所选语言、cookies 等，以及计划订单和按键等所花费的时间。在使用我们的网站时所提供的此类个人数据，我们称之为“用户数据”。

- 5.4. 处理您的用户数据是为了向您提供登录权并在我们的网站上使用您的用户帐户、确保您的身份和年龄、获得有关您的准确和最新信息，以便您能够根据我们的一般条款和条件，跟踪和管理处理中的订单、管理您有关设置和付款明细的选择、协助我们进一步开发和改进我们的网站以及用于提供网站的 IT 系统，并能够向您交付您所订购的商品和服务。我们收集的有关您的用户数据与我们处理的有关您的订购数据将被保存相同的一段时间。

*我们处理个人数据以促使您加入 Zinzino4 Free 计划, 并便于我们向我们的合作伙伴报告佣金等*

- 5.5. 我们还处理您的个人数据以及您的订购和支付信息, 以管理您在“Zinzino4Free”计划中的会员资格, 并且如果您是由 Zinzino 合作伙伴推荐给我们的或您以其他方式被选择与 Zinzino 合作伙伴有关联, 则我们可能会处理您的个人数据, 以便能够向我们的 Zinzino 合作伙伴提供有关向您销售商品的佣金和积分的报告。
- 5.6. 只要您选择继续作为客户俱乐部的一员, 那么为了履行我们的会员协议, 则会处理“Zinzino4Free”计划框架内处理的个人数据。
- 5.7. 为了能够向我们的 Zinzino 合作伙伴报告有关向您销售商品的佣金和积分而处理的信息是基于利益平衡而进行处理的, 即我们认为我们对相关 Zinzino 合作伙伴履行报告义务的利益属于合法利益, 这意味着可以进行处理。客户关系终止后, 此数据的处理时间最长为 12 个月。

*我们处理个人数据以便能够向您销售我们商品和服务*

- 5.8. 最后, 我们会出于营销目的处理您的个人数据, 也就是说, 是为了能够向您推广和销售我们的产品。
- 5.9. 即使出于营销目的对数据进行处理, 它也是基于利益平衡的, 即我们认为我们向您销售产品的利益属于合法利益, 这意味着可以进行处理。我们与您的客户关系终止后, 出于营销目的, 此类处理最多将持续一年。

*我们需要依法处理的数据*

- 5.10. 除上述内容外, 我们可能会在法律规定的范围内及期间内处理您的个人数据以履行法律义务, 例如, 保留会计记录的义务。

## **6. 同意某些处理和“被遗忘的权利”**

- 6.1. 除上述内容外, 您可能还会不定期地通过我们的网站, 有机会向我们提供有关您的其他信息, 例如, 上传您的照片或参加促销活动等。您提供给我们的任何和所有信息, 如果不用于上述任何目的, 则将在获得您的同意后对其进行处理。目前, 这适用于 a) 您上传到我们网站的照片, 直到您撤回您的同意, 或直到您在我们这里的资料被删除 (例如, 由于自您上次订购以来已经过了很长时间, 以及 b) 有关促销活动的信息, 直到宣布获胜者并颁发活动奖品为止。通过与我们一起参加促销活动, 您还同意, 如果您是促销活动获胜者之一, 则您的姓名和照片将在我们的网站上公开发布。

*您撤销同意的权利*

- 6.2. 关于您的个人数据, 以及在仅基于您的同意处理您的个人数据期间, 您可以随时通过联系我们来撤回您的同意。如果您在这种情况下撤回您的同意, 我们仅基于您的同意处理的个人数据将被删除 (“被遗忘的权利”)。如果此数据也被用于其他目的, 则将不再被用于基于您同意的处理目的。

## **7. 我们将如何处理您的信息以及这些信息可以提供给谁**

- 7.1. 我们处理的有关您的个人数据将主要在 Zinzino 内部以及由与我们属于同一集团的公司进行处理, 但是, 相关部分也可能被提供给向您销售商品时收到佣金或积分的合作伙伴, 以及帮助我们生产和配送产品和服务的公司, 例如, 邮政和包裹递送公司以及其他卖家/供应商。我们还聘请分包商, 例如, 提供客户服务系统的分包商, 他们将代表我们作为个人数据处理方来获取您的个人数据。
- 7.2. Zinzino 不会出于营销目的向其他公司披露您的个人数据。

## **8. 您的个人数据存储在哪里?**

- 8.1. 您的个人数据主要存储在我们的个人数据处理方之一所提供的 IT 基础设施中。个人数据主要在 EU/EEA 内进行处理和存储, 但以下情况除外。

## **9. 在 EU/EEA 之外处理的数据**

- 9.1. Zinzino 聘请个人数据处理方, 以便管理客户服务系统, 以及 EU/EEA 之外的供应商和经销商。因此, 与该处理有关的您的个人数据将被传输到美国和加拿大。
- 9.2. 就加拿大而言, 欧盟委员会已确定您的个人数据具有适当的保护级别, 这就是处理被认为是安全的原因。至于在美国的处理, 目前还没有关于适当保护级别的断定。相反, 根据欧盟委员会制定的被视为确保数据得到充分保护的标准协议条款, 我们已与将代表我们作为处理方或作为联合数据控制方 (后者适用于美国的 Zinzino 集团公司) 处理您个人数据的公司签订了协议。如果您愿意, 可以通过联系我们来获得与这些公司签订的协议副本。有关欧盟标准合同条款的更多信息

息, 请参见 [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_sv](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_sv)。

#### 10. 您对我们处理的信息的访问权

10.1. 您有权通过与我们联系获得有关我们处理您数据的通知和信息, 以及该数据副本 (免费)。但是, 对于任何其他副本, 除了您有权免费获得的副本之外, 我们将收取与制作和提供额外副本所产生的费用相对应的管理费。

#### 11. 您更正不正确数据和删除数据的权利

11.1. 如果您认为有关您的任何数据不正确, 则您有权要求更正或删除该信息。如果出现这种情况, 请联系我们, 并告诉我们您认为不正确的信息, 以及需要更正或删除的原因。

#### 12. 您反对某些处理的权利

12.1. 您有权反对我们基于“利益平衡”处理您的个人数据。有关适用处理的更多信息, 请参阅上文第 5.7 节和第 5.9 节。

12.2. 关于出于营销目的而处理的个人数据, 您可以随时提出反对。如果您反对, 将不会再出于营销目的对您的个人数据进行处理。如果您就其他用途提出反对, 我们会就我们继续处理您个人数据的理由慎重考虑。

12.3. 如果您想对基于利益平衡进行处理的部分提出任何异议, 请联系我们。

#### 13. 您享有约束或限制的权利

13.1. 如果您认为我们正在处理的个人数据不正确, 如果处理是非法/违法的, 如果我们不再需要保留或处理数据, 但尽管如此, 如果您仍需要它们以便能够提出合法要求或者您已反对处理, 则您还可以要求限制 (冻结) 对您个人数据的处理, 直到我们处理完您的异议。

#### 14. 您对数据可移植性的权利

14.1. 您有权以结构化、广泛使用且机器可读的格式获取您提供给我们的有关您的个人数据, 以便能够将此信息传输到另一数据控制方。这仅适用于您自己提供给我们的信息, 并且仅在基于您的同意或为了能够履行与您的协议而进行处理时才适用。如果您想以这种方式获取您的个人数据, 请联系我们。

#### 15. 您提出投诉的权利

15.1. 在 Zinzino, 我们非常重视您的隐私。因此, 我们很乐意始终以适当且安全的方式处理您的个人数据。如果您对我们操作或处理个人数据有任何意见, 请随时联系我们。

15.2. 如果您认为我们的个人数据处理在某些方面不正确, 您有权向瑞典 Integritetsskyddsmyndigheten/隐私权保护机构 (前身为 Datainspektionen) 提出投诉, 该机构是负责此类事务的监管机构。更多信息请访问 [www.datainspektionen.se](http://www.datainspektionen.se)。

#### 16. 请随时与我们联系

16.1. 我们的联系方式: Zinzino 香港有限公司 (BRN 65356238), 地址为 Level 12 - One Peking, 1 Peking Road, Tsim Sha Tsui, Hong Kong。您可以致电 +852 5808 2155 或通过电子邮件 [customer.hk@zinzino.com](mailto:customer.hk@zinzino.com) 联系我们的客户支持。