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# 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 distributor 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 Limited, Taiwan Branch, 4F-3, No. 408, Ruiguang Road, Neihu District, Taipei City 114, Taiwan. You can reach our Customer Support at +886227620289 (operation hours 10 am to 7 pm weekdays, Taiwan time) or via e-mail at: [customer.tw@zinzino.com](mailto:customer.tw@zinzino.com).

## 1. 什麼是隱私權政策?

1. 在我們的隱私權政策中，我們會針對您向我們訂購商品或服務的情況，說明由誰負責相關的個人資料處理作業。我們也會針對您在各種向我們提供資訊的情況，說明關於您的哪些個人資料內容會受到處理、我們處理個人資料的方式、我們為什麼處理個人資料、以及我們處理資料所仰賴的法律依據，另外還會說明哪些第三方可能會處理您的個人資料，俾使我們能夠提供您所訂購的商品與服務。針對我們處理您的個人資料情形，就您所擁有的相關權利，以及如何行使您的權利等事宜，您也會收到相關的資訊。

## 2. 重要條款與概念

1. 為更完整瞭解我們的隱私權政策，以下是一些可能具實用價值的重要條款與概念：

- d) 「個人資料」係指涉及已識別身分或可識別身分的自然人的任何資訊。可識別身分的自然人係指，可透過一個基本資料內容而直接或間接識別身分的個人，例如姓名、身分識別號碼（例如瑞典個人身分證號）、關於地點的資訊、線上識別碼（例如 IP 位址）、或是該個人的肢體、生理、基因、心理、財務、文化或社會認同相關的一種或多種因素。
- e) 「處理」係指針對個人資料所為的一種措施或組合措施，例如蒐集、註冊、組織、結構化、儲存、改編或修改、生產、閱讀、使用、或透過傳輸、散佈或以其他方式提供之揭露、調整或彙整、限制、刪除或銷毀等。
- f) 「Zinzino 夥伴」係指在 Zinzino 註冊為 Zinzino 產品分銷商的人或公司。

## 3. 誰負責處理資料?

1. Zinzino Sverige AB 係為資料處理作業的資料控制方。本文所稱之「我們」係指 Zinzino Sverige AB，而「您」係指向我們訂購商品及服務、或有興趣向我們訂購商品及服務之人。

## 4. 我們處理個人資料的一般相關資訊

1. 我們僅會在以下第 5 款所載目的所必要情況下，處理有關您的個人資料。此外，我們針對如何儲存及移除個人資料中的身分識別資訊，訂有相關程序，以持續確保您的個人資料時時保持完善性及相關性。

### *取得資料的來源*

2. 我們在您購物時，直接向您蒐集資訊，而且您需要在訂單中提供我們要求的資訊，如此我們才能處理您的訂單。因此，提供我們所要求的資訊係有所必要，如此我們才能與您訂立協議。

## 5. 我們處理哪些關於您的個人資料，以及處理的理由及相關事宜

### *我們處理個人資料，以便能向您交付商品與服務*

1. 當您向我們訂購商品或服務時，您係與我們訂立協議。因此，我們會處理您基於下訂單而向我們提供的所有個人資料（例如您的姓名、公民身分、身分證號、地址、電子郵件及電話號碼），以及您與我們進行聯絡的詳細資訊（例如 IP 位址），以便能履行我們與您的協議義務，同時也才能處理您的訂單及/或您的訂閱、向您交付已訂購商品及服務、管理商品與服務的付款，以及就您購買內容處理及履行任何顧客服務義務。基於下訂單事宜所提供的個人資料，稱為「訂購資料」。
2. 我們為了處理並交涉您的訂單而蒐集的訂購資料，將會在您與我們的顧客關係持續有效期間、以及在我們的任何保固承諾期間內，基於履行我們與您的協議而受到相關處理。

### *我們在其他使用我們網站時處理個人資料*

3. 使用我們網站時，我們會自動蒐集並處理技術性資訊，包括 IP 位址、登入資訊、作業系統與裝置的類別與版本、時間設定、偏好語言、cookie 等，以及從事訂購所花費的時間、鍵擊資訊等。基於使用我們網站相關事宜所提供的個人資料，稱為「使用者資料」。
4. 您的使用者資訊的處理目的包括，向您提供登入權限，讓您在我們網站上使用您的使用者帳戶，確保您的身分與年齡，讓我們擁有關於您的準確及最新資訊，讓您追蹤並管理您的訂單，讓您管理您的設定及付款資訊，協助我們進一步開發及改善我們網站及用於提供網站的 IT 系統，以及讓我們依據一般條款與條件，向您交付您已訂購的商品與服務。我們所蒐集之關於您的使用者資料，將會與我們所處理之關於您的訂購資料具有相同的保存期間，

### *我們處理個人資料，以便讓您加入 Zinzino4 Free 計畫的會籍，以及讓我們向夥伴通報相關佣金*

5. 我們處理您的個人資料及您的訂購與付款相關資訊，以便能管理您在「Zinzino4Free」計畫的會籍，另外，如果您是經 Zinzino 夥伴介紹，或者您選擇隸屬於某位 Zinzino 夥伴者，我們也會處理您的資料，以便向 Zinzino 夥伴提供銷售相關佣金及點數相關報告。

- 5.6. 對於在「Zinzino4Free」計畫架構中處理的個人資料，只要您持續保有該顧客俱樂部會籍，我們就會基於履行我們的會籍協議，處理該等資料。
- 5.7. 為了向我們的 Zinzino 夥伴通報銷售相關佣金及點數而進行處理的資訊，係基於利益平衡原則辦理，也就是經我們評估後，認為我們向 Zinzino 夥伴履行通報義務的利益，係屬合法利益者，即表示該等資料處理作業係受到許可。此資料會在顧客關係終止後，會持續進行處理最久為期 12 個月。

*我們處理個人資料，以便能向您行銷我們的商品與服務*

- 5.8. 最後，我們基於行銷目的處理您的個人資料，也就是說，為了向您推廣及行銷我們的產品。
- 5.9. 即便資料係基於行銷目的受到處理，仍舊是基於利益平衡原則辦理，也就是經我們評估後，認為向您行銷我們產品的利益屬於合法利益者，即表示該等資料處理作業係受到許可。該等基於行銷目的處理資料的情形，在您與我們的顧客關係終止後，會持續最久一年期間。

*我們依法需要處理的資料*

- 5.10. 除前述項目外，我們得基於履行法律義務，在法律所訂範圍及期間內，處理您的個人資料，例如：製作會計紀錄的義務。

## 6. 對若干資料處理作業的同意，以及「被遺忘的權利」

- 6.1. 我們亦得不定時向您提供機會，讓您透過我們網站，向我們提供前述項目之外，有關您的額外資訊，例如上傳您的照片，或是參與促銷活動等。您向我們提供的任何資訊，不會用於前述目的以外之其他用途，並且僅會在取得您同意後才予以處理。目前這項規定適用於：a) 您上載至我們網站的照片，直到您撤回您的同意或您在我們這裡的個人檔案被刪除（例如：距離您前一筆訂單已經過很長一段時間），以及 b) 促銷活動相關事宜，直到宣布得獎者並且發出活動獎品後。當您參與促銷活動，即表示您同意，如果您是該促銷活動的得獎者，您的姓名與照片會公開登載於我們網站。

*您撤回同意的權利*

- 6.2. 對於您的個人資料，在您的個人資料係僅基於您的同意而受到處理的期間內，您得在任何時間與我們聯絡，要求撤回您的同意。如果您在這種情況下撤回您的同意，我們基於您的同意所處理的個人資料會被刪除（即「被遺忘的權利」）。如果該等資料同時亦基於其他目的而受到處理者，則該等資料將不再基於您所同意的目的進行處理。

## 7. 我們如何處理您的資訊，以及資料提供對象

- 7.1. 我們所處理有關您的個人資料，主要會在 Zinzino 內部進行處理，並且由我們集團內的公司處理，不過可能有部分個人資料會提供給基於銷售情事而收受佣金或點數的合作夥伴，以及協助我們生產及分銷產品及服務的公司，例如郵政及包裹遞送公司，以及其他廠商/供應商。我們也會僱用分包商（例如提供顧客服務系統的分包商），他們會代表我們，以資料處理方的身分，取得您個人資料的存取權限。
- 7.2. Zinzino 不會基於行銷目的，向其他公司揭露您的個人資料。

## 8. 您的個人資料儲存在哪裡？

- 8.1. 您的個人資料主要儲存在由我們的個人資料處理商所提供的 IT 基礎建設中。個人資料主要係在歐盟/歐洲經濟體中進行處理及儲存，但有以下例外情況。

## 9. 在歐盟/歐洲經濟體境外儲存的資料

- 9.1. Zinzino 雇用個人資料處理商來管理顧客服務系統，同時也雇用位於歐盟/歐洲經濟體境外的供應商及分銷商。因此就本資料處理作業情形，您的個人資料會被傳輸至美國及加拿大。
- 9.2. 歐盟執委會已認定，加拿大對您個人資料具有妥善的保護程度，因此資料處理作業被視為安全。至於美國，歐盟執委會尚未就其資料保護程度做出決定。對於代表我們以資料處理方身分或以共同資料控制方身分（後者適用於 Zinzino 位於美國的集團公司）處理您個人資料的公司，我們已依據歐盟執委會所制定的標準制式條款，與該等公司簽署協議，該等條款被視為能確保資料受到充分保護的程度。如果您需要取得一份我們與該等公司的協議，您可以與我們聯絡。如欲取得歐盟的標準制式條款更多相關資訊，請參閱 [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. 您對於我們所處理的資訊所擁有的權利

- 10.1. 對於我們所處理關於您的資料，您有權收受相關通知以及取得相關資訊，並與我們聯絡以取得一份該等資料（免費）。不過如果您在您的有權免費取得的份額外，想另外取得其他複本者，我們會向您收取行政費用，以反映製作並向您提供額外複本的成本。

**11. 訂正不正確資料與刪除資料的權利**

- 11.1. 如果您認為有任何關於您的資料不正確，您有權要求訂正或刪除該等資料。如發生該等情況，請與我們聯絡，並告知您認為不正確的資訊，以及為什麼應予訂正或刪除。

**12. 拒絕若干資料處理的權利**

- 12.1. 您對於我們基於「利益平衡原則」所為之資料處理作業，有權予以拒絕。如欲瞭解這項規定適用的資料處理作業有哪些，請參閱前揭第 5.7 款及 5.9 款。
- 12.2. 對於基於行銷目的所為之個人資料處理情事，您可以在任何時間予以拒絕。如果您選擇這麼做，您的個人資料就不會再被基於行銷目的而進行處理。如果您對於其他用途表示拒絕，我們會視之為您拒絕我們持續處理您個人資料的理由。
- 12.3. 如果您想針對基於利益平衡原則所為之任何資料處理作業表示拒絕，請與我們聯絡。

**13. 限制資料處理的權利**

- 13.1. 您可以在以下情況中，要求對您個人資料之處理作業進行限制（凍結）：您認為我們所處理的個人資料不正確者，或資料處理作業屬於非法/違法者，或我們不再需要保留或處理資料，但您仍需要該等資料才能提出法律請求權主張者，或您已拒絕資料處理作業，並等候我們處理您提出的拒絕者。

**14. 資料可攜性的權利**

- 14.1. 對於您向我們提供關於您的個人資料，您有權以結構化、普遍使用且機器可讀的格式，獲得該等個人資料，以便能把該等資訊移轉給其他資料控制方。這項規定僅適用於您自行向我們提供的資訊，並且只限基於您的同意或基於我們為履行與您的協議所為之資料處理作業。如果您希望以這種方式取得您的個人資料，請與我們聯絡。

**15. 提出申訴的權利**

- 15.1. 在 Zinzino，我們嚴正看待您的隱私權。因此您的個人資料受到妥善安全方式的處理，讓我們感到非常榮幸。如果您對於我們對待或處理個人資料的方式有任何意見，歡迎與我們聯絡。
- 15.2. 如果您認為我們的個人資料處理作業在某些方面不正確者，您有權向瑞典的隱私權保護主管機關（Integritetsskyddsmyndigheten；先前稱為 Datainspektionen）提出申訴，該機關是該等事宜的監管主管機關。如欲取得更多資訊，請前往 [www.datainspektionen.se](http://www.datainspektionen.se)。

**16. 歡迎與我們聯絡**

- 16.1. 我們的聯絡方式為：香港商聖希諾香港有限公司台灣分公司，114 台北市內湖區瑞光路 408 號 4 樓之 3。您可以跟我們的顧客支援部聯絡，電話：+886227620289（營業時間：台灣時間週一到週五上午 10 點到下午 7 點），或透過電子郵件：[customer.tw@zinzino.com](mailto:customer.tw@zinzino.com)。