

# 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 South African 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 Operations AB* is the data controller in relation to the processing. In this text, *Zinzino Operations 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). 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 published 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 Operations AB Incorporated in Sweden (2021/667001/10), Unit 18 Block C, Heuwelsig Office Park, 923 Spinetail Street, Celtisdal, Centurion, Gauteng, 157, South Africa.
- 16.2. You can reach our customer service at: +27128810395 (9-16 SAST mon-fri) or via e-mail at: [customer.za@Zinzino.com](mailto:customer.za@Zinzino.com).