

PRIVACY POLICY

Your privacy is important to us. This privacy statement explains:

1. What personal data is collected by the owner of this web site or provided by you, through our interactions with you and your use of our web site (<http://www.retailcrm.es/>), apps and software
2. How your personal data will be used, where it is held, how long it will be kept and your rights.

Please read this privacy policy carefully.

DEFINITIONS AND INTERPRETATION

In this privacy, the following definitions are used:

Data controller means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed.

Data processor, in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

“You”, “your” or “data subject” means:

- Visitors to our website
- Subscribers to any service we offer through our site
- Prospective or existing clients corresponding with us by phone, e-mail or otherwise

Data controller, “we”, “us” and “our” means:

DIGITAL RETAIL TECHNOLOGIES SL and its data processors;

Personal data means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organizations collect information about people. The definition incorporates, where applicable, the definitions provided in the General Data Protection Regulation (EU 2016/679).

SENSITIVE PERSONAL DATA

The GDPR refers to sensitive personal data as “special category data”. Please see “Special category data”.

SPECIAL CATEGORY DATA

Means personal data consisting of information as to the racial or ethnic origin of the data subject, his political opinions, his religious beliefs or other beliefs of a similar

nature, whether he is a member of a trade union, his physical or mental health or condition, his sexual life. The special category specifically includes genetic data, and biometric data where processed to uniquely identify an individual.

CRIMINAL OFFENCE DATA

Personal data relating to criminal convictions and offences.

WHO WE ARE (IDENTITY OF THE DATA CONTROLLER)

For the purpose of the General Data Protection Regulation the data controller is DIGITAL RETAIL TECHNOLOGIES SL with NIF B70567656 and the registered address at: 28001, calle Serrano 19, 6ta dcha, Madrid, Spain.

CHANGES TO THIS PRIVACY POLICY

The Company may update this Privacy Policy at any time. The latest version is available at http://www.retailcrm.pro/privacy_policy. In case of any significant changes of the Privacy Policy you will receive notification on your email address filled in your account information and will post prominent notice of the Site prior to changes becoming effective.

PERSONAL DATA WE MAY COLLECT FROM YOU

We may collect and process the following data and personal information about you:

PERSONAL DATA YOU PROVIDE US VOLUNTARILY

We collect the information provided by you to operate effectively and provide you the best experiences with our Website, products and services. You provide some of this information voluntarily by filling in the contact forms on our web site, creating an account at our Website or by corresponding with us by phone, e-mail or otherwise. This includes information you provide if you subscribe to any service we offer through our site, send us a query or feedback, sign up for information on events, upload a document with your enquiry, purchase services via the Website, participate in discussion boards or other social media functions on our site, promotion or survey or when you report a problem with our Website.

The information you may give us is Personally Identifiable Information (“PII”). When we refer to “PII” in this policy we mean information that identifies an individual or may with reasonable efforts cause the identification of an individual may include your:

First name, Surname, e-mail address and phone number, credentials: we collect passwords, password hints and similar security information used for your authentication and account access if you create an account at our Website, information on requested or provided services, your message / enquiry / call which might contain but not limited to: your company name, web site link, business contact information, job title, representative voice recording;

CHILDREN

We do not sell any products or services for purchase by children. If you are under 16, you may use our Website only with the involvement of your holder of parental responsibility. We do not knowingly collect personal information from children below 16 without the consent of the child's holder of parental responsibility.

INFORMATION YOU PROVIDE ABOUT OTHERS

In providing personal data about other individuals (such as someone in whose name you are registering an account or subscribing to our marketing promotions), you represent that you have notified them of (i) the purposes for which information will be used (ii) the recipients of their personal data and (iii) how they can access and correct the information. You further represent that You have obtained all necessary consents from them.

The data processing practices related to cases when we act as a data processor and process on behalf of our customers are described in our Data Processing Agreement and are not described in this privacy policy.

INFORMATION WHICH MAY BE MADE AVAILABLE TO US, OR COLLECTED AUTOMATICALLY WITH THE USE OF COOKIES OR ANALYTIC TOOLS

We might get some information from our visitors by recording how they interact with our Website with the use of cookies, analytic tools or obtain data from third parties.

TECHNICAL INFORMATION, INCLUDING PERSONALLY IDENTIFIABLE INFORMATION:

- Might include your device and connectivity information such as IP (Internet Protocol) address, unique device identifiers (such as the IMEI for phones)

NON-PERSONALLY IDENTIFIABLE INFORMATION:

- Might include your configuration data such as browser type, version and language setting, time zone setting, browser plug-in types and versions;
- Details of how you used our Website, such as your search queries. Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;
- Log information, such as error reports, download errors, any problems you experience using our website and any phone number used to call our customer service number.

We do not combine information collected automatically through cookies and analytic tools with other personally identifiable information you may have provided to us when you registered for our Products or submitted a form through our Website.

COOKIE POLICY

We use tracking technologies like cookies, tags, scripts to collect and store information from you when you use our Services, such as your IP address, browser type, browser language, operating system, device type, referring site (site you visited before coming to our Site), date and time of visit, URL and page metadata, operating system type and application version. We may also automatically collect and store certain information in activity logs such as: details of how you used our Sites and Services, your search queries, and your IP address. These technologies are used in analyzing trends, tracking users' behavior on the Site and to gather demographic information about our client base as a whole to improve Services we provide you.

A cookie is a small file, typically of letters and numbers, downloaded on to a device when the user accesses certain websites. Cookies allow a website to recognize a user's device.

We might use cookies to recognize you when you visit our site or use our Services, remember your preferences, and give you a personalized experience:

AUTHENTICATION COOKIES. If you're signed in to our Services, these cookies will help us show you the right information and personalize your experience.

SESSION COOKIES. These cookies store the ID of a user's session. The cookie is set when a user signs in and is used to restore the session without entering the personal data.

SECURITY COOKIES. We use cookies for our security features, and to help us detect malicious activity.

PREFERENCE, FEATURES AND SERVICES. These cookies help us to customize your preferences, such as which language you prefer and what your communications preferences are or to fill out forms on our faster.

PERFORMANCE, ANALYTICS AND RESEARCH. These cookies help us to analyze our web site performance. We use cookies to improve our products, features, and services, including to create logs and record when you access our site.

THIRD-PARTY COOKIES. We might use them for website analytics and advertising purposes, i.e. cookies which are set and can be accessed by servers respectively domains of our third-party providers.

We are using Google Analytics cookies on this website which might register a unique ID that is used to generate statistical data on how the visitor uses the website, and cookies sending data to Google Analytics about the visitor's device and behavior which track the visitor across devices and marketing channels.

We use the following session, permanent and third-party marketing cookies and tracking technologies, including cookies from our partners and service providers:

Name	Provider	ExpireDescription	Tracker Type	Description
PHPSESSID	loader.witget.com	Session	HTTP Cookie	Preserves user session state across page requests
CookieConsent	retailcrm.pro	1 year	HTTP Cookie	Statistical cookie
PHPSESSID	retailcrm.pro	Session	HTTP Cookie	Statistical cookie
collect	google-analytics.com	Session	Pixel Tracker	Used to send data to Google Analytics about the visitor's device and behavior. Tracks the visitor across devices and marketing channels
_ga	retailcrm.pro	2 years	HTTP Cookie	Registers unique ID that is used to generate statistical data on how the visitor uses the website.
_gat	retailcrm.pro	Session	HTTP Cookie	Used by Google Analytics to throttle request rate
_gid	retailcrm.pro	Session	HTTP Cookie	Marketing cookie
_ym_isad	retailcrm.pro	Session	HTTP Cookie	Marketing cookie
_ym_uid	retailcrm.pro	1 year	HTTP Cookie	Marketing cookie
r/collect	doubleclick.net	Session	Pixel Tracker	This cookie is used to send data to Google Analytics about the visitor's device and behavior. It tracks the visitor across devices and marketing channels.
fr	facebook.com	3 months	HTTP Cookie	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.
tr	facebook.com	Session	Pixel Tracker	Marketing cookie
_ym_metrika_enabled	retailcrm.pro	Session	HTTP Cookie	Marketing cookie
i	yandex.ru	1 year	HTTP Cookie	Marketing cookie
webvisor/43754464	yandex.ru	Session	Pixel Tracker	Marketing cookie
yabs-sid	yandex.ru	Session	HTTP Cookie	Marketing cookie
yandexuid	yandex.ru	1 year	HTTP Cookie	Marketing cookie
yp	yandex.ru	10 years	HTTP Cookie	Marketing cookie
GPS	youtube.com	Session	HTTP Cookie	Marketing cookie
VISITOR_INFO1_LIVE	youtube.com	179 days	HTTP Cookie	Marketing cookie
YSC	youtube.com	Session	HTTP Cookie	Marketing cookie
yt-remote-cast-installed	youtube.com	Session	HTML Local Storage	Marketing cookie
yt-remote-connected-devices	youtube.com	Persistent	HTML Local Storage	Marketing cookie

yt-remote-device-id	youtube.com	Persistent	HTML Local Storage	Marketing cookie
yt-remote-fast-check-period	youtube.com	Session	HTML Local Storage	Marketing cookie
yt-remote-session-app	youtube.com	Session	HTML Local Storage	Marketing cookie
yt-remote-session-name	youtube.com	Session	HTML Local Storage	Marketing cookie
api/v1/pixel.gif	relap.io	Session	Pixel Tracker	Pixel Tracker
hllc	relap.io	Session	HTTP Cookie	Marketing cookie
rlpadbf	relap.io	Session	HTTP Cookie	Marketing cookie
rlpsp	relap.io	Session	HTTP Cookie	Marketing cookie
suid	relap.io	Session	HTTP Cookie	Marketing cookie
unique	relap.io	10 years	HTTP Cookie	Marketing cookie
_rc	retailcrm.pro	2 years	HTTP Cookie	Marketing cookie
_ym_d	retailcrm.pro	1 years	HTTP Cookie	Marketing cookie
_ym_metrika_enabled_43754464	retailcrm.pro	Session	HTTP Cookie	Marketing cookie
_ym_retryReqs	retailcrm.pro	Persistent	HTML Local Storage	Marketing cookie
_ym_visorc_43754464	retailcrm.pro	Session	HTTP Cookie	Marketing cookie
_ym43754464_lastHit	retailcrm.pro	Persistent	HTML Local Storage	Marketing cookie
_ym43754464_lsid	retailcrm.pro	Persistent	HTML Local Storage	Marketing cookie
_ym43754464_reqNum	retailcrm.pro	Persistent	HTML Local Storage	Marketing cookie
metrika_enabled	retailcrm.pro	Session	HTTP Cookie	Marketing cookie
roistat_ab	retailcrm.pro	Session	HTTP Cookie	Marketing cookie
roistat_first_visit	retailcrm.pro	10 years	HTTP Cookie	Marketing cookie
roistat_marker_old	retailcrm.pro	Persistent	HTML Local Storage	Marketing cookie
roistat_visit	retailcrm.pro	13 years	HTTP Cookie	Marketing cookie
undefined	retailcrm.pro	1 year	HTTP Cookie	Marketing cookie
Witget[C1]	witget.com	4166 days	HTTP Cookie	Marketing cookie
Witget[C2]	witget.com	Session	HTTP Cookie	Marketing cookie
Witget[C3]	witget.com	Session	HTTP Cookie	Marketing cookie
yt.innertube::nextId	youtube.com	Persistent	HTML Local Storage	Marketing cookie

WHAT CAN YOU DO IF YOU DON'T WANT COOKIES TO BE SET OR WANT THEM TO BE REMOVED

Most browsers accept cookies automatically, however some people prefer not to allow cookies. You may change the security settings of your web browser in order to stop

your device receiving and storing cookies, to allow receiving and storing cookies from selected websites you trust, or to be notified before receiving cookies. You may also delete cookies stored in your browser at any time. Information stored in such cookies will be removed from your device. However, that these settings may have negative effects on the web sites usability.

Browser manufacturers usually provide help pages relating to cookie management in their products. Please see below for more information:

- Google: <https://support.google.com/chrome/answer/95647?hl=en-GB>
- Internet Explorer: <https://support.microsoft.com/en-us/help/260971/description-of-cookies>
- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Safari (Desktop): https://support.apple.com/kb/PH5042?locale=en_US
- Safari (Mobile): <https://support.apple.com/en-us/HT201265>
- Android Browser: https://support.google.com/nexus/answer/54068?visit_id=1-636585517588941681-639659396&hl=en&rd=1
- Opera: <https://www.opera.com/help>
- Opera Mobile: <https://www.opera.com/help/mobile/android#privacy>

For other browsers, please consult the documentation that your browser manufacturer provides.

You may opt-out of third party cookies from Google Analytics on its website.

You can opt-out of interest-based targeting provided by participating ad servers through the Digital Advertising Alliance (<http://youradchoices.com>). In addition, on your iPhone, iPad or Android, you can change your device settings to control whether you see online interest-based ads.

SOCIAL MEDIA FEATURES AND WIDGETS

Our Website might include certain Social Media features and widgets in order to allow you an authorization as part of Oath functionality for using our blog services, such as the “Facebook Login”, “Twitter”, “Google +1”, “VK”, “Odnoklassniki”, “Tumblr”, “Yandex”, “Live Journal” features, buttons or other interactive mini-programs (“Social Media Features”). These Social Media Features may collect information such as your IP address or which page you are visiting on our Website, and may set a cookie to enable them to function properly. Social Media Features are either hosted by a third party or hosted directly on our Website. Please be aware that if you choose to interact or share any Personal Information via such widgets, you are in fact providing it to these third parties and not to us. Your interactions with these third parties are managed by these Social Media policies and not ours. For example, you will not be able to use the “Facebook Like” button if you are not logged in to your Facebook account. Once you use the button this will be associated with your Facebook history, but we will not process this information.

INFORMATION WE MIGHT OBTAIN FROM THIRD PARTIES

We might obtain some non-personally identifiable information from third parties. We protect data obtained from third parties according to the practices described in this statement, plus any additional restrictions imposed by the source of data.

We might insert advertising on our partner websites, social networks or Advertising networks who might categorize website visitors with similar characteristics or interests into non-personally identifiable data segments and offer these segments to their own clients, visitors and subscribers. For example, if a person expresses an interest in cryptocurrency or beauty products, they might see an advertising banner linking to similar service provider company website.

We might obtain and record information that an ad was requested or shown, how many times, the target geography of the ad (which will not include an IP address or specific personally identifiable location and any user interactions with the ad or the page where the ad appears. This information is used for analysis, reporting and troubleshooting. We do not perform any visitors profiling activities.

WHERE DO WE STORE YOUR INFORMATION?

We take Client confidentiality and security very seriously. We are committed to protecting the Personal Data you share with us. We use a combination of industry-standard security technologies, procedures, and organizational measures to help protect your Personal Data from unauthorized access, use or disclosure.

Your personal data is stored inside European Union Area. DIGITAL RETAIL TECHNOLOGIES S.L. engages OVH France to store the data and the data processing consists in hosting provider services. The backup data is stored on Amazon Web Services (AWS Cloud infrastructure in Europe (Frankfurt) Region).

The written agreements with the data processors guarantee that the requirements of the GDPR will be met and the rights of data subjects are protected. The Data Processor will only act on behalf of our documented instructions, have direct responsibilities under the GDPR and may be subject to fines or other sanctions if they don't comply.

Once this contract is concluded, data processor will return data to us or transmit to another processor appointed by us, and erase any copy in its possession. However, the processor may keep the data locked to address possible administrative or jurisdictional responsibilities.

TRUSTED PARTNERS (DATA PROCESSORS) WHO WORK ON OUR BEHALF UNDER CONFIDENTIALITY AGREEMENTS AND MIGHT STORE, MAINTAIN OR PROCESS YOUR DATA:

We have partnered with a number of authorized service providers (data processors), whose services and solutions complement, facilitate and enhance our own under written confidentiality agreements that guarantees that the requirements of the GDPR will be met and the rights of data subjects are protected. Data processors only act on behalf of

our documented instructions. They have direct responsibilities under the GDPR and may be subject to fines or other sanctions if they don't comply.

These might include:

Information technology service providers, web analytics, e-mail distribution and monitoring services, marketing services, content delivery networks (CDNs), our legal and financial advisors, accountants, insurance brokers and companies, delivery services, IP Telephony services, messenger services.

Such data processors may receive or otherwise have access to your identifiable or non-identifiable personal data, in its entirety or in part – depending on each of their particular roles and purposes in facilitating and enhancing our Services and business, and may only use it for such purposes. Under no circumstances may data processors will use the data for their own purposes.

Your personal data might be maintained, stored and processed at a destination inside the European Economic Area.

Once this contract is concluded, data processor will return data to us or transmit to another processor appointed by us, and erase any copy in its possession. However, the processor may keep the data locked to address possible administrative or jurisdictional responsibilities.

DATA RETENTION

Unless otherwise specified, where you have indicated to us that you are happy for us to send you the information about goods and services we offer and we feel may interest you or similar to those that you have already purchased or enquired about do so, we assume you are happy for us to keep your collected personal data. We may retain your Personal Information (contact details) for as long as your User Account is active or as otherwise needed to provide you with information about our Services. As the data subject you have rights related to processing of your personal data and the option of withdrawing your consent to receive promotions at any time. Please see paragraph "Your rights".

If you and us enter in a contract, we might keep your data during the performance of the contract and as long as it is necessary as for our legitimate interests. Please see paragraph "Lawful basis and the Uses made of your personal information".

LAWFUL BASIS AND THE USES MADE OF YOUR PERSONAL INFORMATION

We process all personal data lawfully, fairly and in a transparent manner. We use the data we collect for the following basic purposes, described in more detail below:

1. To take steps at the request of the data subject prior to entering into a business relationship (oral or written contract):

1.1 By contacting us by means specified in paragraph “Personal Data you provide us voluntarily”, we assume that processing is necessary for the performance of a business relationship (oral or written contract) or in order to take steps prior to entering into a business relationship (oral or written contract), and therefore the lawful basis is Contract.

1.2 We will use the provided information to operate effectively and do our best to respond to your enquiry and provide you our services consisting in: synchronization of business data including orders, customer’s data, products and services with CMS systems, online sales systems, delivery companies, stock management systems, supply management systems, warehouse systems, preparation of printing forms, configuration of customer segments, CRM services, eCommerce, technical support as described in detail in our “AGREEMENT on the Transfer of a Simple Non-Exclusive Right (License)” and “Data Processing Agreement”. Once you enter into a business relationship (oral or written contract) with us, we will invoice our services and offer you post-sales service and necessary loyalty.

2. We might hold your information for as long as is necessary to comply with our and legal obligations and in accordance with our legitimate interests as a data controller after the contractual relationship between you and us elapses. The lawful basis for such retention is Legitimate interests and Legal obligation. As the data subject you have rights related to maintenance, storage, and processing of your personal data. Please see paragraph “Your rights”.

3. To send you communications, including promotional communications and advertising with your explicit consent or allow you to participate in interactive features of our service, when you choose to do so. The lawful basis for such processing is your Consent and our Legitimate interests.

3.1 If you wish not to receive such promotional e-mails, you may withdraw your consent at any time by contacting us as described in paragraph “Your rights” or follow the “unsubscribe” or instructions contained in the promotional communications you receive.

4. Website improvement

We might use your automatically collected data such as IP address and browser data for our Website improvement, such as:

4.1 To administer our site and for internal operations, including data security, troubleshooting, testing, statistical, and survey purposes;

4.2 To ensure that content from our site is presented in the most effective manner for you and for your device. The lawful basis for such processing is Legitimate interests.

PROTECTION OF INFORMATION

We keep your information secure by taking appropriate technical and organizational measures against its unauthorized or unlawful processing and against its accidental loss, destruction, damage, misuse or disclosure. Unfortunately, the Internet due to its nature is not always secure therefore, although we will do our best to protect your personal data, we cannot guarantee the 100% security of your data which is transmitted to us via Internet. If we have given you (or you have chosen) a password to access certain areas of our website please keep this password safe – we will not share this password with anyone. If you have any questions regarding security on our Site, please contact us at: support@retailcrm.pro or +44 2070437182.

DISCLOSURE OF INFORMATION TO THIRD PARTIES

We do not rent, sell, or share personal information about you with other people or non-affiliated companies without your consent except to provide products or services you've requested, when we have your permission, or under the following circumstances:

1. We provide the information to trusted partners who provide us services under confidentiality agreements, specified in Paragraph "Trusted partners (data processors) who work on our behalf under confidentiality agreements and might store, maintain or process your data". These companies do not have any independent right to share this information.
2. We may disclose your information to third parties when we reasonably believe we are obligated to do so by law, and in order to investigate, prevent, or take action regarding suspected or actual prohibited activities, including but not limited to, fraud and situations involving potential threats to the physical safety of any person.
3. In the event we are acquired by or merged with a third party entity or undergo another change of control, we reserve the right to transfer information, including any PII and non-PII, to a successor entity. In this event, we will notify you by electronic means before information about you is transferred and becomes subject to a different privacy policy.

YOUR RIGHTS

You have the following rights in accordance with the General Data Protection Regulation:

1. THE RIGHT TO BE INFORMED. In this privacy statement we supply you detailed information related to your personal data storage, maintenance and processing.
2. THE RIGHT TO ACCESS INFORMATION HELD ABOUT YOU.
3. THE RIGHT TO RECTIFY YOUR PERSONAL DATA if it is inaccurate, incomplete, or out-of-date.
4. THE RIGHT TO ERASURE (DELETE OR REMOVE) YOUR PERSONAL DATA.
5. THE RIGHT TO RESTRICT (BLOCK) PROCESSING. When processing is restricted, we will store your personal data, but not further process it.
6. THE RIGHT TO DATA PORTABILITY is your right to receive the personal data which you have given to us, in a structured, commonly used and machine-readable format and the right to transmit that data to another controller from the current controller applicable if: The processing is based on consent or on a contract, and the processing is carried out by automated means.
7. RIGHTS RELATED TO AUTOMATED DECISION MAKING INCLUDING PROFILING.
8. THE RIGHT TO WITHDRAW YOUR CONSENT OR OBJECT TO DIRECT MARKETING AND OTHER TYPES OF PROCESSING IF APPLICABLE.

You can exercise your rights by contacting us at: support@retailcrm.pro or +442070437182.

THE RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY
You have the right to lodge a complaint with a supervisory authority if you have a concern about our information rights practices.