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# Privacy Notice

In this privacy statement we explain which personal data we collect and use and for what purpose. We advise you to read this statement carefully.

Updated on: 27 May 2020

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## 1. Privacy policy Sparcio UG (haftungsbeschränkt)

We think it is of great importance that personal data is handled with care. Personal data are therefore carefully processed and secured by us.

Sparcio offers innovative water saving products for both consumers and businesses. Through our website we offer all kinds of services. This goes from providing the best site performance (e.g. language), help via the chat, a contact form, brochures, a webshop etc.. To be able to offer these services to our visitors, potential customers and customers we process privacy-sensitive information, also known as personal data. In some cases we work together with other organizations or companies to process this data for our internal purposes. Examples of these include: data sent to a payment provider to process a payment, to keep track of our customers in a Customer Relationship Management (CRM) system and for our accounting systems.

We adhere to the requirements of the privacy legislation. That means, for example, that we:

- clearly state the purposes for which we process personal data. We do this via this privacy statement;
- restrict the collection of personal data to only the personal data that are necessary for the purposes for which they are processed;
- first ask for explicit permission to process your personal data in cases where your permission is required;
- not to pass on your details to third parties, unless this is necessary to provide the service requested by you or when we are legally obliged to do so;
- when we share your data with 3<sup>rd</sup> parties for our internal processes, make agreements with third parties to ensure that they are not used for other purposes;
- we never sell or share your personal data with 3<sup>rd</sup> parties with the intent of making money.
- take appropriate security measures to protect your personal data and also requirements of parties that process personal data on our instructions;
- respect your right to provide your personal data for inspection, correct or delete.

# 1. Use of personal data

When using our services and websites, you leave certain information with us. That may be personal data. We do not always process all the data below. That depends on which services and functionalities you choose to use on our websites. For example, we only process your address when you buy something from our online store.

## Personal data

Depending on the services and functionalities that you use on our website or if you buy our products directly from us. We may process the following personal data from you:

- Name
- Company details
- E-mail address
- Telephone number
- Address
- Bank details e.g. IBAN
- Your sector based on brochure downloaded
- Technical measurement data of the equipment such as IP address and identifiers in cookies
- Your surfing behaviour on our website
- Water saving potential (if you decided to use the water saving calculator)
- The products you bought through our webshop
- Technical measurement data of the equipment such as IP address, MAC address, identifiers in cookies and your surfing behavior on our websites

## 2. Purpose

We process the above data for one or more of the following purposes (depending on which services or functionalities you use):

- to offer you the opportunity to order products via our websites and to make use of all functionalities and services on the websites.
- to process your purchase and inform you about its progress.
- to be able to inform you about your water consumption and your savings potential
- to process your question, feedback or complaint via our contact forms
- to be able to set up a support chat with you
- to approach you about question, feedback or complaint
- to communicate with you by sending electronic newsletters and / or mail
- to provide you with information regarding the Sparcio products
- to answer your questions or to handle your complaints via social media, e-mail, by mail or by telephone
- to improve our website and our services.

### **3. Provision to third parties**

We only pass on personal data to third parties, if this is necessary for the delivery of the products ordered by you, services requested or to improve our website. For instance, we use a third party for the processing of payments in our webshop and we pass on your details to the mail deliverer to deliver the order to you. The data we collect regarding website visitors is only for our own purpose and not for any marketing or advertorial purposes such as advertisements on other websites.

When we provide your data to a third party, we have an agreement with them in place so your data is being treated confidentially. We also agree that your data will be deleted as soon as they are no longer needed.

Furthermore, we will not provide your data to other 3<sup>rd</sup> parties, unless this is legally required or permitted by you. For example, it is possible that the police will request information from us in the context of fraud investigations. In that case, we are legally obliged to provide this information.

### **4. Where do we keep your data**

We store your data in different databases. We always apply strict security measures. East West, at home best: that is why your data is almost always stored within the European Union. In the exceptional case that customer data is transferred to countries outside the European Union, we ensure that your privacy is protected in an appropriate manner. This has been officially established for a number of countries. Some American parties have registered under the Privacy Shield that offers sufficient protection. Or we work with official model contracts that have been specially designed to guarantee your privacy.

### **5. Cookies**

We use cookies when you visit our website. The cookies are used for the correct functioning of our website and to know where the visitors of our website come from, so we can provide you with a better experience such as the language settings.

#### **Functional cookies**

Functional cookies are necessary for the website to function properly. For example to ensure that products are kept in your shopping cart when you want to buy something in our webshop or your language preference.

#### **Performance cookies**

We utilise other cookies to analyse how our visitors use our websites and to monitor website performance. This allows us to provide a high quality experience and quickly identifying and fixing any issues that arise. For example, we might use performance cookies to keep track of which pages are most popular, what customers are looking for which method of linking between pages is most effective, and to determine why some pages are receiving error messages.

This way we know which website parts are popular and in which places we can improve our website. We continuously analyze and improve the website to make the experience as pleasant as possible for visitors. We can not trace the statistics we collect to actual persons..

We use Google Analytics to obtain insights from the data. The following is an example of the types of performance cookies we use:

Google Analytics	This is a secondary customer usage service to Adobe Site Catalyst.	All these cookies are prefixed with "_utm"	First Party
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We always place the analytical cookies when visiting our website. Analytical cookies collect, among other things, the following data:

- Track the number of visitors on our web pages.
- Tracking the duration of the visit and pages.
- Information about your browser and device with which you visit our website, such as operating system and screen resolution is used to view the website
- The way you ended up on our website, for example whether you clicked on one of our advertisements or on a link in an e-mail.

Items that you have added to the cart on the website.

For more information about what Google Analytics does with the collected data, we also refer to the privacy statements of Google. These statements can change regularly. We never provide your personal details (such as name, address, BSN, telephone number) to Google.

## 6. How long do we keep your data

We do not store and use your data for longer than necessary. Then we delete all data we have from you. Or we use your data anonymously, because we need certain data for internal analyzes and reports such as the value of your order. Sounds nice and simple, but how does that work in practice? We keep certain deadlines, after which we delete your data. These are:

- We delete recorded phone calls by default after 30 days unless we have a legal obligation to keep a conversation longer.
- We delete website visitor information after 36 months.
- We must keep our administration with your invoice, payment and order data for 7 years from the tax authorities. After that, we only use anonymous data for internal reports. We also have to keep the invoices for your purchases, for example when your guarantee expires.
- If you have your product repaired or replaced by Sparcio UG (haftungsbeschränkt), we will keep your report and contact details for 7 years. After that, we only use your data anonymously, for internal reports.
- If you have purchased a mobile subscription via Sparcio UG (haftungsbeschränkt), we will keep your contract with the telecom provider for 7 years. After that period we use anonymised data for internal reports.
- If you have registered for the newsletter or have given permission to receive personalized messages, we will retain that permission for 5 years. Even if you decide at some point that you no longer wish to receive the newsletter or personalized messages, we will retain the withdrawal of your request. We will not keep the e-mails that you receive from us for more than 60 days. So you do not have to worry about receiving the same mail from us more often. After that period we only use your data anonymously, for internal reports.
- We retain data that we use to prevent fraud for a long time. Not nice, but necessary.

## **7. Third party websites**

This statement does not apply to websites of third parties that are connected to our website by means of links. We can not guarantee that these websites handle your personal data in a reliable or secure way. Always read the privacy statement of this website before using the relevant website, for more information about how they handle your data.

## **8. Minors**

If you are 16 or younger, you may only use our website under the supervision of your parents or legal representatives.

## **9. Changes to this privacy statement**

We may change this privacy statement from time to time. Changes will be published on our website. We never use your data without permission for other purposes. It is therefore advisable to consult this privacy statement regularly, so that you are aware of these changes.

## **10. Your rights and Questions**

You have various rights under data protection law in connection with our processing of your personal data. For example, you have the right to request a copy of your personal data that we hold and to request that we correct any errors in the personal data that we hold. These rights are subject to certain exceptions and exemptions. You have the following rights under data protection law:

- Right to access your personal data - You have the right to request a copy of the personal data that we hold about you, together with other information about our processing of that personal data.
- Right to rectification – You have the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the information so that it is complete.
- Right to erasure – You have the right to request us to delete personal data that we hold about you. This is sometimes referred to as the right to be forgotten.
- Right to restriction of processing or to object to processing – You have the right to request that we no longer process your personal data for particular purposes, or to object to our processing of your personal data for particular purposes.
- Right to data portability – You have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine readable format.

You can contact Sparcio customer service via the following details:

Telephone 0049 89 41209548  
Monday to Friday from 8.30 am to 5 pm (CEST)

E-mail [privacyquestions@sparcio.com](mailto:privacyquestions@sparcio.com)

Post Sparcio UG (haftungsbeschränkt), Bereiteranger 4, 81541 München, Germany

To prevent misuse, we ask you to identify yourself adequately by a written request for inspection, by sending a copy of a valid proof of identity. Do not forget to shield your National number and your passport photo on the copy. For example, you can use the 'Copy ID' app for this.

Of course we would be happy to help you if you have complaints about the processing of your personal data. Should you nevertheless not come out with us, then you also have the right under the privacy legislation to file a complaint with the privacy guard, the Dutch Data Protection Authority. You can contact the German Data Protection Authority for this.

### **Entry into force**

This (renewed) privacy statement came into effect on 27<sup>th</sup> of May 2020.