

# Privacy Statement and Cookies

## Introduction

Cyclamineus ("Company", "mine", "my", "me" or "I"), the "data controller" of the personal information I collect about you pursuant to this Privacy Statement, is committed to protecting your privacy. This Privacy Statement details the steps I take to protect your personal information when you visit any of our websites or applications that contain a link to this Privacy Statement (collectively, our "Sites") or when you contact me. It describes how I process personal information relating to you, including the types of personal information that I collect, the purposes for which I use it, the types of third parties with which I share it, and any rights you may have with respect to such information. Personal information is information, or a combination of pieces of information, that allow you to be identified.

This Privacy Statement applies only when you visit any of my website that link to this Privacy Statement or when you contact me, for example, with a comment, inquiry or customer support request. Personal information collected about you in connection with other Company websites, products, services or mobile applications (including those made available to you by my company) may be covered by different privacy statements. It is important that you read this Privacy Statement together with any other privacy statements or other notices I may provide to you on specific occasions when I'm collecting or processing your personal information so that you are fully aware of how and why I'm using your information.

By using or accessing my website or contacting me you agree that I may process your personal information in the manner described in this Privacy Statement. Your use of my website and any information you provide through them is subject at all times to this Privacy Statement and the applicable terms and conditions that apply to the website.

**IMPORTANT NOTICE FOR RESIDENTS OF THE EUROPEAN ECONOMIC AREA (EEA) :** EEA RESIDENTS MAY BE ENTITLED TO OBJECT TO CERTAIN TYPES OF PROCESSING ACTIVITIES INVOLVING YOUR PERSONAL INFORMATION DESCRIBED IN THIS PRIVACY STATEMENT, INCLUDING WHERE I AM RELYING ON A LEGITIMATE INTEREST TO PROCESS YOUR PERSONAL INFORMATION OR WHERE WE ARE PROCESSING YOUR PERSONAL INFORMATION FOR DIRECT MARKETING. IN SOME CASES, WE MAY DEMONSTRATE THAT I HAVE COMPELLING LEGITIMATE GROUNDS TO CONTINUE TO PROCESS YOUR PERSONAL INFORMATION IN WHICH CASE I AM NOT OBLIGED TO COMPLY WITH YOUR REQUEST

## Collection of information

### **Information collected directly from you.**

When you visit my website, I may ask you for personal information to provide a service or carry out a transaction that you have requested. You may also provide personal information to me when you contact me.

The personal information I collect from you when you use my website may include:

- **Identity data**, such as your name, title, company/organization name, e-mail address, telephone and physical address (including street, city, state, postal code, and/or country);
- **Marketing and communications data**, including your marketing preferences and your subscriptions to my publications;
- **Export control information**, such as your nationality, citizenship and country of residence, that allows me to determine your eligibility under export control regulations to receive information about certain technologies;
- **Transaction data**, including inquiries about and orders for my products and services and details of payments to and from you;

- **Your feedback**, including feedback from you about my website as well as my products and services generally.

When you do not provide requested information, I may not be able to provide you the requested service or complete your transaction.

### **Information I collect about you.**

I collect certain information about your visit to my website, including:

- **Usage data**, including information about how you use my Sites, what pages you view, the number of bytes transferred, the links you click, the materials you access, the date and time you access the Site, the website from which you linked to one of my Sites and other actions taken within the Sites; and
- **Technical data**, such as your Internet Protocol (IP) address, your browser type and capabilities and language and your operating system.
- **Geo-location information**,  
For certain Sites, with your express consent, I may collect the precise, real-time location (i.e., geo-location) of your mobile device. This information will be used only for purposes of facilitating your use of the Sites. The geo-location of your mobile device may be disclosed to my service providers who may process this information in connection with providing services on my behalf. Once you have consented to the collection of the precise, real-time location of your mobile device, you may adjust this consent by managing your Location Services preferences through the settings of your mobile device.

For information about the cookies I use on my Sites, please refer to the section entitled “Cookies” below.

## Use of information

I may use the personal information collected via my Sites or when you contact me for purposes that include:

- **Services and transactions.** I may use your personal information to deliver services to you or carry out transactions you have requested, including, but not limited to, providing information on Company products or services you have purchased or otherwise use, registering purchased products, processing product orders, handling warranty claims, replacing product manuals, answering customer service requests and facilitating the use of my Sites.
- **Administering and protecting my business and Sites.** I may use your personal information to administer and protect my business and my Sites, including troubleshooting, system maintenance, support, reporting and hosting of data.
- **Improving my business, Sites, products and services.** I may use your personal information to perform business analyses or for other purposes that help me to develop and improve the quality of my business, Sites, products and services (including new products and services), for example, by customizing our Sites to your particular preferences or interests.
- **Marketing.** In accordance with applicable laws and regulations, I may use your personal information to inform you of products or services which may be of interest to you, and to otherwise communicate with you about offerings, events and news, surveys, special offers, and related topics. You are able to opt-out from marketing communications sent via e-mail at any time, free of charge by using the “unsubscribe” link in any e-mail marketing materials you receive from me, or by contacting me using the contact information listed in this Privacy Statement. Depending on your country of residence, you may also be able to opt out of other types of marketing communications; please contact me using the contact information listed in the Privacy Statement for more information.

- **Research and analysis.** I may use your personal information to conduct research and analysis to help me analyze your purchasing preferences, identify the products and services that best meet your requirements and measure the effectiveness of the advertising I serve you.
- **Enforcement:** I may use the personal information I collect in order to detect, prevent and respond to fraud, intellectual property infringement, violations of my terms and conditions, violations of law or other misuse of my Sites.

Where permitted by law, I may combine the information that I collect via my Sites with other information I hold about you (such as information about your use of my products and services) in order to offer you an improved and consistent customer experience when interacting with me or for other purposes set forth in this Privacy Statement.

## The legal basis on which I process information

Where required by law, I will ensure there is a legal basis for the processing of your personal information. In most cases the legal basis will be that:

- the processing is necessary for the performance of the services I provide to you;
- the processing is necessary to comply with our legal obligations, including compliance with applicable laws, regulations, governmental and quasi-governmental requests, court orders or subpoenas;
- the processing is based on your consent to the processing of your personal information for one or more specified purposes (e.g. marketing); or
- the processing is necessary to meet our legitimate interests, for example to develop and improve my Sites, products and/or services for the benefit of our customers.

## Anonymizing information

In accordance with applicable law, I may anonymize your personal information so that it can no longer be used to identify you. Anonymized information is not considered personal information and is therefore not subject to this Privacy Statement. I may collect, use and share anonymized information for any purpose.

## How long I keep information

The period during which I store your personal information varies depending on the purpose for the processing. For example, I store personal information needed to provide you with products and services, or to facilitate transactions you have requested, for so long as you are a customer of the Company. I store your personal information for marketing purposes until you have opted out of receiving further direct marketing communications in accordance with applicable law. In all other cases, I store your personal information for as long as is needed to fulfill the purposes outlined in this privacy statement, following which time it is either anonymized (where permitted by applicable law), deleted or destroyed.

## Disclosure of information

I may share your personal information with selected third parties in accordance with applicable law, including as set out below.

- **Service providers.** I may share your personal information with companies with which I have contracted to provide services on my behalf, such as hosting websites, conducting surveys, processing transactions, analyzing my Sites and performing analyses to improve the quality of my business, Sites, products and services. I require these service providers to protect the confidentiality of your personal information.

- **Distributors and other trusted business partners.** I may share your personal information with third parties that distribute our products and other trusted business partners for purposes that include allowing those third parties to send marketing communications to you. Such sharing of personal information for marketing purposes will be performed in accordance with applicable laws and regulations.
- **Disclosure in connection with transactions.** In connection with certain transactions, I may disclose some or all of your personal information to financial institutions, government entities and shipping companies or postal services involved in fulfillment of the transaction.
- **Disclosure for other reasons.** I may disclose personal information if required or authorized to do so by law or in the good-faith belief that such action is necessary to comply with legal requirements or with legal process served on me, to protect and defend my rights or property or, in urgent circumstances, to protect the personal safety of any individual.

## International transfers

My company runs all over the World. By using or accessing my Sites or contacting me and giving your information to me, you acknowledge and agree that your personal information may be collected in, transferred to and accessed by the Company, suppliers, distributors and other business partners and/or agents located in countries outside of your country or residence, in accordance with applicable law. Please be aware that the privacy protections and legal requirements, including the rights of authorities to access your personal information, in some of these countries may not be equivalent to those in your country of residence.

### **Users Located in the European Economic Area (EEA)**

Where required, I have put in place appropriate safeguards with service providers, contractors, distributors and other business partners and agents to ensure that transfers of personal information outside the EEA are adequately protected. These safeguards typically comprise the EU Standard Contractual Clauses in accordance with

Article 46(2) of the EU General Data Protection Regulation. For more information on the appropriate safeguards in place to protect your personal information, please contact us using the details at the end of this Privacy Statement.

## Security

I'm committed to protecting the security of your personal information. I use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use or disclosure, including implementation of such security measures as may be required by applicable law. However, no information system can be 100% secure, so I cannot guarantee the absolute security of your personal information. Moreover, I'm not responsible for the security of information you transmit to the Sites over networks that I don't control, including the Internet and wireless networks.

## Cookies and similar technologies

### **I use performance Cookies, such as Google Analytics**

These cookies collect information about how you use my Sites, for example which pages you go to most often and if you get any error messages from certain pages. These cookies collect information that is used to improve how my Sites work. Without these cookies I cannot learn how my Sites are performing and make relevant improvements that could better your browsing experience. Performance cookies that my Sites use include Google and Adobe Analytics (see further discussion below).

I use industry standard web analytics to track visits to my sites. These analytics are provided by Google Analytics, Adobe Analytics. The information generated by the cookie about your use of my Sites (including your IP address) will be transmitted to and stored by our Web Analytic Providers on their servers. The Web Analytics Providers will use this information for the purpose of evaluating your use of my Sites, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. The Web Analytics Providers may also transfer this information to third parties where required to do so by law, or where such third parties process the information on their behalf.

You may opt out of Google, Adobe analytics or otherwise control how these technologies are used when you visit my sites, by following the instructions here:

[Google Analytics Opt Out Link](#)

[Adobe Analytics Opt Out Link](#)

## Do Not Track

Some web browsers may transmit “do-not-track” signals to the Sites with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. I currently do not take action in response to these signals.

## Your rights

You may have certain rights with respect to personal information about you that is collected through the Sites or when you contact me. If you are a resident of the EEA, the rights described below may apply to you. For other users, the rights that apply to you will depend on the laws of your country of residence. I will facilitate your exercise of the rights that apply to you in accordance with applicable law. For more information about your rights, please contact us using the contact details at the end of this Privacy Statement.

- **Access** : You may have the right to access, review and correct personal information collected through my Sites or when you contact me. In some cases, you can do this by going to the page on which you provided the information. You can help me to maintain the accuracy of your information by notifying me of any change to your mailing address, phone number or e-mail address.
- **Object** : YOU MAY BE ENTITLED TO OBJECT TO CERTAIN TYPES OF PROCESSING ACTIVITIES INVOLVING YOUR PERSONAL INFORMATION, INCLUDING WHERE I AM RELYING ON A LEGITIMATE INTEREST TO PROCESS YOUR PERSONAL INFORMATION OR WHERE I AM PROCESSING YOUR

PERSONAL INFORMATION FOR DIRECT MARKETING. IN SOME CASES, I MAY DEMONSTRATE THAT I HAVE COMPELLING LEGITIMATE GROUNDS TO CONTINUE TO PROCESS YOUR PERSONAL INFORMATION IN WHICH CASE I AM NOT OBLIGED TO COMPLY WITH YOUR REQUEST.

- **Erasure** : You may be entitled to request the erasure of your personal information, for example, where the information is no longer necessary for the purposes for which they were collected.
- **Restriction** : You may be entitled to request that I restrict my processing of your personal information, for example, where the accuracy of the information is contested by you.
- **Data portability** : You may be entitled to receive and reuse your personal information for your own purposes. This is known as the right to data portability and, where applicable, requires us to move, copy or transfer your personal information from our systems to you or (where technically feasible) a third party chosen by you without affecting its usability.
- **Consent**: If you have provided your consent to the processing of your personal information, you may have the right to withdraw your consent at any time by contacting us using the contact details at the end of this Privacy Statement or, in the case of email marketing, by using the “unsubscribe” link in any of our marketing emails. This won’t affect the lawfulness of any processing up to that point.

I will respond to any requests from you to exercise your rights within the timeframes required by law. I may charge a fee to facilitate your request where permitted by law. To exercise any of your rights, please contact us using the contact details set out at the end of this Privacy Statement. I may take steps to verify your identity before taking action on a request. If you believe my processing of your personal information does not comply with data protection law, you can make a complaint to the supervisory authority in charge of overseeing compliance with data protection law in your jurisdiction. I would however appreciate the chance to address your concerns, so please feel free to contact us regarding any complaint you may have.

## Links to other websites

My Sites may contain links to third-party websites, products and services. I have no liability or responsibility for those websites, products and services, their policies, or their collection or other processing of your personal information. The practices of those third parties with respect to information collected through their websites, products or services is governed by their own privacy policies. I encourage you to learn about the privacy policies of those third parties.

## Contact me

If you have questions regarding this Privacy Statement or my handling of your personal information, would like to lodge a complaint, or wish to contact my Data Protection Officer, please contact me using the contact information listed below. I will promptly address your concern and strive to reach a satisfactory resolution.

Cyclamineus

Marco ten Hoope

**Email :**

[info@cyclamineus](mailto:info@cyclamineus)

## Changes to this Privacy Statement

I may occasionally update this Privacy Statement. When I do, I will revise the "last updated" date at the bottom of the Privacy Statement and take such additional steps as may be required by law.

**Last updated Mars 5th, 2019**