Privacy Policy

Welcome to our website <u>www.nickeltest.com</u>.

For **SQUARIX GmbH** your privacy and the security of your personal data are very important; therefore we collect and manage your personal data with the utmost care and take specific measures to keep them secure. Below, you will find the main information on the processing by SQUARIX GmbH of your personal data in relation to your browsing on our websites and the use of the services offered. Please also read our '<u>General Terms and Conditions</u>' of our website (<u>https://www.nickeltest.com/agbs.php?SPR=en</u>) which contain detailed information regarding the conditions of our services. Some services may be subject to specific legal terms, in which case we will give you all the appropriate information from time to time.

Who is the Holder?

The following is the main information on the processing of your personal data carried out by

SQUARIX GmbH, Elbestr. 10, 45768 MARL, Germany; <u>www.nickeltest.com</u>, VAT no DE153 309 001

as Data Controller.

For any clarification, questions or requirements related to your privacy and the processing of your personal data, you can contact us at any time by sending a request to <u>info@squarix.de</u> or by writing to our address.

What data do we process and why?

The personal data that SQUARIX manages are those that you provide when you complete an order and purchase goods, and those that we collect while you browse or when you use the services offered on <u>www.nickeltest.com</u>. SQUARIX can then collect data about you, such as personal data including name and surname, shipping address and billing address, browsing data and your purchase habits. Your personal data is processed for the following purposes:

- Conclude and execute the purchase contract for goods offered on <u>www.nickeltest.com</u>;
- Provide you with the services of <u>www.nickeltest.com</u> such as signing up for the newsletter;
- Allow registration to the site and use of services reserved for registered users;
- Manage your requests forwarded to us.

In the aforementioned cases, the processing of your personal data is legitimate as it is necessary to execute an agreement with you or to provide you with the service you have specifically requested. We also conduct statistical surveys and analyses with data in aggregate form to understand how users interact and use the site, to improve our offer and our services.

Only with your express consent, however, we process your personal data to:

- Carry out commercial communications activities;
- Customise the site according to your interests.

Who will process your data?

Your personal data is processed by the duly trained personnel of our company and, for organisational and functional needs related to the provision of services on <u>www.nickeltest.com</u>, by our suppliers. The latter have been evaluated and chosen by SQUARIX for their proven reliability and competence. Some of these subjects may also be based in non-EU countries and, in these cases, the transfer of your personal data in these countries is carried out in compliance with the guarantees established by law.

How long do we keep your data?

We keep your personal data for a limited period of time depending on the purpose for which it was collected, at the end of which your personal data will be deleted or otherwise rendered anonymous in an irreversible way. The retention period is different depending on the purpose of the processing: for example, the data collected during the purchase of goods on www.albertaferretti.com are processed until the conclusion of all administrative and accounting formalities, so they are filed in accordance with tax legislation local (ten years), while those used to send our newsletter are retained until you ask us to stop sending.

What are your rights?

At any time, depending on the specific processing, you can: withdraw consent to the processing, know which of your personal data we have in our possession, its origin and how it is used, request the update, correction or integration as well, in the cases provided for by the current provisions, the cancellation, the limitation of processing or oppose their processing. If you wish, you can request to receive personal data held by SQUARIX that concern you in a format readable by electronic devices and, where technically possible, we can transfer your data directly to a third party indicated by you. If you believe that the processing of your personal data has been carried out illegitimately, you can file a complaint with one of the supervisory authorities responsible for compliance with the rules on personal data protection. In Germany, the complaint can be presented to the <u>Bundesdatenschutzbeauftragte(n)</u>.

This information may undergo changes and additions over time, so we invite you to periodically check the contents. Where possible, we will try to inform you promptly of any changes made.

Informativa Privacy

1. General information

Who is the Data Controller?

SQUARIX GmbH, Elbestr. 10, 45768 Marl (NRW), Germany, <u>www.nickeltest.com</u>, VAT no. DE153 309 001,

is the Data Controller, that is, the subject who decides how and why to process your personal data.

You can always contact SQUARIX by writing to the above address or by <u>contacting</u> <u>us (info@squarix.de)</u>

2. What personal data do we collect?

The categories of personal data that SQUARIX collects and processes when you browse or purchase on www.nickeltest.com, are as follows:

- We collect the personal data necessary to conclude and execute your purchase on www.nickeltest.com such as name and surname, email address, shipping address, billing address, telephone and payment details;
- 2. We collect your email address when you sign up for an eventually offered newsletter service;
- 3. We process the personal data you provide when you contact us to provide the assistance requested;
- 4. With your consent, we collect and use your personal data for commercial communications;
- 5. we collect information about your browsing on www.nickeltest.com, such as the pages you visit and how you interact with the single page and we save this information on our servers.

We inform you that SQUARIX does not process personal data relating to minors. If you access www.nickeltest.com and use the services offered by SQUARIX you declare that you are of legal age.

3. How do we use personal data collected?

SQUARIX collects and processes your personal data for the following purposes:

 Conclude and execute the purchase agreement for the products offered on www.nickeltest.com. When you complete your purchase, we ask you for the personal data necessary for the execution of the agreement, such as payment, anti-fraud checks if you choose to pay by credit or debit card, billing, shipping of the product and possible management of the return.

- 2. Provision of services offered on www.nickeltest.com. For this purpose, SQUARIX needs to collect the personal data necessary to perform the specific service requested by you in relation to each service and its characteristics.
- 3. Management of requests to us, which uses the personal data you provide to meet your requests for information and requests for assistance.
- 4. statistical analysis and surveys. We use some information about your use of the site, your browsing and use of the related services to perform analysis and statistical surveys in order to improve our offer and our services.
- 5. Subject to your express consent, we may use the contact details you have provided for commercial communications on our products and services, in order to update you on news, new arrivals, exclusive products, our offers and promotions. In addition, always with your consent, we will be able to use your contacts as part of market research and surveys for the detection of satisfaction in order to improve our services and the relationship with our users.

If you wish to authorise the activities referred to in points h) and i) and then do not wish to receive further communications from SQUARIX or if you wish to limit the way in which you are contacted, you can interrupt these communications at any time by simply clicking on the appropriate 'unsubscribe' link at the bottom of each communication, or you can always contact SQUARIX through info@squarix.de or by writing to the address above.

In relation to all the activities mentioned above, we will process your personal data mainly through IT and electronic tools; the tools we use guarantee high safety standards, in full compliance with current legislation.

4. Legal basis of the processing

We only process your personal data in the presence of one of the legal requirements established by current legislation, and specifically:

- For the conclusion and execution of an agreement of which you are a part. When we process your data for the conclusion of the purchase agreement of which you are a part, we ensure that we only use the minimum information necessary for the execution of this. This basis legitimises the processing of personal data that takes place in the following activities:
 - Conclusion and execution of a purchase agreement for the products offered on www.nickeltest.com,

- Registration on the site and use of services reserved for registered users;
- Provision of services offered on www.nickeltest.com,
- Management of your requests by our Customer Care.

The provision of your personal data for these activities is a contractual obligation. You are free to communicate your data or not, but in the absence of the requested data, it will not be possible to conclude or execute the agreement and your requests. This means that you will not be able to purchase products and you will not be able to use the SQUARIX services and that SQUARIX will not be able to handle your requests.

2. To comply with a legal obligation.

In the event of conclusion of an agreement for the purchase of goods on www.nickeltest.com, the processing of the user's data will take place in order to fulfill the legal obligations to which SQUARIX complies with. You are free to decide whether to conclude an agreement and whether or not to disclose your data, but if you conclude it, your data will be necessary and will be processed to effect the aforementioned legal obligations to which SQUARIX is required. The processing of voluntarily sent CVs, carried out to evaluate candidates with respect to a possible job position at SQUARIX, is legitimate because it is expressly authorised by a law, which specifies that in this case the consent of the person to whom the personal data refers is not required. You are free to send us your CV or not, but without it we will not be able to evaluate your candidacy for a job position at SQUARIX.

3. for our legitimate interest.

If you purchase products on www.nickeltest.com by credit or debit card, some of your personal data may be processed to carry out anti-fraud activities: we have a legitimate interest in carrying out this activity to prevent and pursue any fraudulent activity. For internal administrative purposes, data may be processed by companies belonging to the business group to which SQUARIX belongs.

- Based on your consent.
 We will carry out the following processing only if you have given us your express consent:
 - o Carrying out marketing activities and opinion polls and market research;
 - Analysis of your browsing and consumption habits in the use of your My Account profile, in order to personalise your experience on our site.

Providing your consent for these activities is optional. You are free to give your consent or not, but without it, it will not be possible for SQUARIX to carry out

marketing activities, opinion polls and market research, and to analyse your habits.

5. Who will process your data?

Your personal data will be processed by SQUARIX internal staff who are specifically trained and authorised to process it.

Your data may be transmitted to police and judicial and administrative authorities, in accordance with the law, for the detection and prosecution of crimes, the prevention and protection from threats to public security, to allow SQUARIX to ascertain, exercise or defend a right in court, as well as for other reasons related to the protection of the rights and freedoms of others.

6. How long do we keep the data?

We keep your personal data for a limited period of time, different depending on the type of activity that involves the processing of your personal data. After this period, your data will be permanently erased or otherwise rendered anonymous in an irreversible way.

Your personal data is stored in compliance with the terms and criteria specified below:

- data collected to conclude and execute agreements for the purchase of goods on www.nickeltest.com: until the completion of administrative and accounting formalities. The billing data will be kept for ten years from the billing date;
- 2. Data relating to the payment: up to the certification of the payment and the conclusion of the related administrative and accounting formalities resulting from the expiration of the right of withdrawal and the terms applied for the contestation of the payment;
- Data collected in the context of the use of services offered on www.nickeltest.com: this data is retained until the termination of service or request for cancellation of the subscription to the service by the user;
- 4. Data related to user requests to our Customer Care: the data useful to assist you will be kept until your request is met;
- 5. Data used for commercial communication to users who purchase products on www.nickeltest.com: this data is retained until the termination of service or the exercise of the opposition by unsubscription from the service by the user;
- Data used to personalise the site and to show customised commercial offers: as long as the user does not request the termination of the activity and in any case within two years from the last interaction of any kind of user with SQUARIX;

7. Your rights

You can exercise your rights with reference to the specific processing of your personal data by SQUARIX at any time. Find below their general description and how to exercise them.

- 1. Access your data and modify it: you have the right to access your personal data and to request that it be correct, modified or integrated with other information. If you wish, we will provide you with a copy of your data in our possession
- 2. Revoke your consent: you can revoke a consent you have given for the processing of your personal data in relation to any activity for marketing purposes at any time. In this regard, we remind you that marketing activities are considered the sending of commercial and promotional communications, the conduct of opinion polls and market research, in order to detect your degree of satisfaction and improve the services offered. Once we receive your request, it will be our duty to promptly cease to process your personal data based on this consent, while different processing or that which is based on other assumptions will continue to be carried out in full compliance with the provisions in force.
- 3. Opposition to the processing of your data: you have the right to object at any time to the processing of your personal data made on the basis of our legitimate interest, explaining the reasons that justify your request; before accepting it, SQUARIX will have to evaluate the reasons for your request.
- 4. Delete your data: you may request the cancellation of your personal data in the cases provided for by current legislation. Once your request has been received and examined and if it is legitimate, it will be our duty to timely cease to process your personal data and to delete it
- 5. Request that the processing of your personal data is temporarily limited: in this case, SQUARIX will continue to keep your personal data but will not process it, unless it is subject to your different request and the exceptions established by law. Processing of your personal data can be limited when you dispute the accuracy of your personal data, when the processing is illegal but you oppose the cancellation of your data, when we no longer need your personal data but you need to exercise your right in court and when you oppose your processing, in the period in which we evaluate the reasons for your request.

In order to exercise some of your rights described above, you can <u>contact us</u> (<u>info@squarix.de</u>) or write to the address of the Data Controller above. In order to ensure that our users' data is is not illegitimately used or infringed upon by third parties, we may ask you for some information to be sure of your identity before accepting your request to exercise one of the rights indicated.

In any case, for technical reasons, the termination of the processing and the consequent definitive cancellation or anonymity of the related personal data in an irreversible way will be final within thirty days from the terms indicated above.

8. Security measures

We protect your personal data with specific technical and organisational security measures, aimed at preventing your personal data from being used illegitimately or fraudulently. In particular, we use security measures that guarantee: the confidentiality, integrity, availability of your data as well as the resilience of the systems and services that process them; the ability to restore data in the event of a data breach. In addition, SQUARIX agrees to test, verify and regularly evaluate the effectiveness of technical and organisational measures in order to guarantee continuous improvement in the security of processing.

9. Complaints

If you believe that the processing of your personal data has been carried out unlawfully, you can file a complaint with one of the competent control authorities for compliance with the rules on personal data protection. In Germany, the complaint can be presented to 'Datenschutzbeauftragte(n)'. More information on how to present them is available on his website at <u>https://www.bfdi.bund.de/DE/Service/Kontakt/kontakt_node.html</u> or at <u>https://www.bfdi.bund.de/DE/Datenschutz/Ueberblick/MeineRechte/Artikel/Beschwer</u> deBeiDatenschutzbehoereden.html.

10. Changes to this information

The constant development of our services may lead to changes in the characteristics of the processing of your personal data described up to now. Consequently, this privacy policy may be subject to changes and additions over time, which may also be necessary with regard to new regulatory measures regarding the protection of personal data.

Therefore, we invite you to periodically check the contents: where possible, we will try to inform you promptly on the changes made and their consequences.

In any case, the updated version of the privacy statement will be published on this page, with indication of the date of its last update.

11. Legislative references and useful links

The processing of your personal data is carried out by SQUARIX in full compliance with the regulations on the matter pursuant to <u>General Data Protection Regulation</u> (EU) 2016/679 (<u>https://eur-lex.europa.eu/legal-</u>

<u>content/EN/TXT/?uri=celex%3A32016R0679</u>) The rules on the processing of German personal data are available at the provisions of the German Supervisory Authority

(https://www.bfdi.bund.de/DE/Datenschutz/Ueberblick/MeineRechte/Artikel/Beschwer deBeiDatenschutzbehoereden.html)

and, where applicable, the competent foreign control authorities.

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