

## **Data Privacy Policy of Sévigné Goldschmiede GmbH**

We thank you for your visit to our website <https://sevigne.de/shop> and your interest in our company and our offers. Despite careful control of the contents, we do not assume any liability for external links to third-party contents, as we have not initiated the transfer of this information, did not select the addressee of the transmitted information and the transmitted information ourselves or have amended any such information ourselves.

The protection of your personal data in connection with the collection, processing of use on the occasion of your visit to our Internet pages is an important concern for us. The collection, processing and use of your personal data takes place within the scope of the statutory provisions on which you may for instance obtain information on the website [www.bfd.bund.de](http://www.bfd.bund.de).

In the following, we explain which information we record on the occasion of your visit to our websites and how this information is used.

### **1. Collection and Storage of Personal Data as well as Nature and Purpose of their Use**

#### **a) When visiting the Website**

Whenever a customer (or any other visitor) visits our website, the Internet browser used on your device (computer, laptop, tablet, smartphone, etc.) automatically sends information to the server of our website. This information is temporarily stored in a so-called log file.

The following data is in this connection collected and stored, without any action on your part, until the time of automatic deletion:

- (pseudonymised) IP-address of the accessing computer as well as device-ID or individual device identifier and type of device,
- the name of the retrieved file and the transmitted data volume, as well as date and time of the retrieval,
- report on successful retrieval,
- accessing domain,
- description of the type of Internet browser used and of the operating system of your device as well as the name of your access provider, as the case may be,
- your browser history data as well as your default web log information,

Our justified interest in accordance with Art. 6 para. 1 sentence 1 lit. f GDPR is based on the following purposes:

- ensuring the smooth establishment of a connection and comfortable use of the website,
- analysis of system security and system stability, and
- other administrative purposes.

In no event will we use the collected data for the purpose of drawing any conclusions as to your person.

#### **b) When using our Contact Form**

Should you have questions of any kind, we offer you the possibility to contact us via a Contact Form provided on our website. In this connection, the specification of your name

and of a valid email address is at least required, so that we know, who sent the enquiry and are able to answer it. Further information may be provided on a voluntary basis.

The data processing for the purpose of establishing contact with us takes place in accordance with Art. 6 para. 1 sentence 1 lit. a GDPR on the basis of your voluntarily granted consent.

The personal data collected by us for the use of the Contact Form will be automatically erased after the inquiry you have sent us has been answered.

#### c) When concluding a contractual Relationship

Upon the conclusion of a contractual relationship on our website (e.g. purchase via the Online-Shop), we ask you to provide the following personal data:

- data that personally identify you, such as name and email address, address for invoice and delivery, and telephone number,
- Data that identifies your company, such as company, address, communication data (e-mail address, telephone, fax number), VAT ID or tax number, if applicable,
- information on your means of payment,
- additional personal data to whose collection we are legally obliged or entitled and which we require for your authentication, identification or for verifying the data collected by us.

The above-mentioned data are processed for the handling of the contractual relationship. The processing of the data is performed on the basis of Art. 6 para. 1 sentence 1 lit. b GDPR. The storage period is restricted to the contractual purpose and, if applicable, legal and contractual retention regulations.

The personal data collected by us for ordering will be blocked for further use after the contract has been fully processed. Your data will be stored until the end of the statutory warranty period and deleted thereafter unless we are obliged to store them for a longer period in accordance with Art. 6 Para. 1 S. 1 lit. c GDPR due to tax and commercial law storage and documentation obligations (from HGB, StGB or AO) or you have consented to storage going beyond this in accordance with Art. 6 Para. 1 S. 1 lit. a GDPR.

#### d) Use of Payment service providers

We also work with the following payment service providers to process your order. We pass on your order data within the framework of payment processing - earmarked for payment - to the payment service provider selected by you, insofar as this is necessary for payment processing. The following payment service providers can be selected for payment. Legal basis for the passing on of the data is here in each case Art. 6 para. 1 lit. b GDPR.

- PayPal:

If you choose to pay via "PayPal" (by credit card, direct debit or invoice via PayPal), you will be forwarded directly to the payment service provider PayPal (Europe) S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg "PayPal") via an interface after confirmation of the conclusion of the contract, where you can enter your payment details and select the payment method you wish to use with PayPal and then process the payment. Please note that PayPal's privacy policy applies. Please refer to the PayPal Privacy Policy (<https://www.paypal.com/de/webapps/mpp/ua/privacy-full>) for information on how PayPal processes your personal data and your rights.

As a precaution, we would like to point out that PayPal reserves the right to carry out a creditworthiness check if PayPal is to make advance payment due to the justified interest in accordance with Art. 6 Para. 1 lit. b GDPR in determining your solvency. For this purpose, PayPal may pass on your payment data to credit agencies. The result of the credit check with regard to the statistical probability of non-payment can contain probability values (so-called score values), which are calculated on the basis of scientifically recognised mathematical-statistical procedures and include address data, among other things, in their calculation. According to PayPal, their interests worthy of protection are taken into account in accordance with the statutory provisions.

For more information about PayPal's handling of your data, and in particular about your rights, please refer to PayPal's privacy policy (<https://www.paypal.com/de/webapps/mpp/ua/privacy-full>).

#### e) When registering for our Newsletter

If you expressly consented in accordance with Art. 6 para. 1 sentence 1 lit. a GDPR, we will use your email address for sending you our newsletter on a regular basis.

Deregistration is possible at any time, for instance via a link at the end of a newsletter. Alternatively, you can send us your deregistration request also via email to [kontakt@sevigne.de](mailto:kontakt@sevigne.de) (it is best to use the reference: "Deregistration/Abmeldung Newsletter").

## 2. Disclosure of personal Data

No transmission of your data to third parties for purposes other than those listed below takes place.

We disclose your data to third parties only, if:

- you gave your express *consent* to such disclosure (Art. 6 para. 1 sentence 1 lit. a GDPR),
- this is required for the *performance of contracts* to which you are a party (Art. 6 para. 1 sentence 1 lit. b GDPR),
- there is a *legal obligation* to disclose the data (Art. 6 para.1 sentence 1 lit. c GDPR),
- the disclosure is *required* for the establishment, exercise or defence of legal claims and there is no reason to assume that you have an overriding interest worthy of protection in the non-disclosure of your data (Art. 6 para. 1 sentence 1 lit. f GDPR).

In these cases, the volume of the disclosed data is however restricted to the necessary minimum.

Our data protection and data privacy provisions are in compliance with the applicable provisions of data protection legislation and the data are processed only in the Federal Republic of Germany. A transfer to third countries does not take place and is not intended.

## 3. Rights of Data Subjects

Upon your request, we will be pleased to inform you whether and which personal data are stored with regard to your person (Art. 15 GDPR), in particular on the purposes of processing, the category of personal data, the categories of recipients to whom your data have been or will be disclosed, the intended storage period, the existence of a right to

rectification, erasure, restriction of processing or objection, the existence of a right to lodge complaints, the origin of your data, if these were not collected by us, and on the existence of automated individual decision-making, including profiling.

You also have the right to rectify any incorrectly collected personal data or to have incompletely collected data completed (Art. 16 GDPR).

Moreover, you have the right to demand the restriction of processing of your data by us, if the legal prerequisites are fulfilled (Art. 18 GDPR).

You have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format or to demand transmission of the data to another controller (Art. 20 GDPR).

Moreover, you have the so-called "Right to be forgotten", i.e. you are entitled to demand that we erase your personal data as soon as the legal prerequisites for such erasure are fulfilled (Art. 17 GDPR).

Irrespective of the above, your personal data will automatically be erased by us, when the purpose of the data collection no longer exists or the data processing has been unlawful.

In accordance with Art. 7 para. 3 GDPR you have the right to revoke your consent given to us at any time. As a consequence, we will not be permitted to continue the processing of data that was performed on this basis in the future.

**You in addition have the right to object at any time against the processing of your personal data, if a right to object is provided for by law. In the event of a legally valid objection, your personal data will also be automatically erased by us (Art. 21 GDPR).**

**If you wish to avail yourself of your right of revocation or objection, just send an email to [kontakt@sevigne.de](mailto:kontakt@sevigne.de)**

In the event of any violations of the provisions of data protection legislation, you are able, in accordance with Art. 77 GDPR, to lodge a complaint with the competent supervisory authority. The competent supervisory authority is both the Bayerische Landesamt für Datenschutzaufsicht/Bavarian State Office of Data Protection Supervision (<https://www.lda.bayern.de/de/index.html>) and any other supervisory authority.

#### **4. Duration of Data Storage**

The collected data are stored by us as long as this is required for the performance of the contracts concluded with us or as long as you have not exercised your right to erasure or to transfer of data to another company.

#### **5. Cookies**

We use cookies on our website. These are small text files that are automatically generated by your browser and are saved to your device when you visit our website.

In the cookie, information is stored that results in each case from the specifically used device. This however does not mean that we directly obtain knowledge of your identity.

The use of cookies initially serves to make the use of our offer more pleasant for you: For example, we use so-called temporary cookies to optimise user-friendliness, which are stored on your terminal for a specific period of time. If you visit our website again to make use of our services, it is automatically recognised that you have already been with us and which entries and settings you have made so that you do not have to enter them again.

Moreover, we employ cookies to statistically record and analyse the use of our website and to optimise our offers for you. These cookies enable us to automatically recognise that you have already visited our website when you visit our website again. These cookies are automatically deleted after a predefined period of time.

The data processed by cookies are required for the aforementioned purposes to safeguard our justified interests and those of third parties in accordance with Art. 6 para. 1 sentence 1 lit. f GDPR. Most browsers automatically accept cookies. If you do not wish that we recognise information on your computer, kindly change the settings of your Internet browser in such a way that it deletes cookies from your computer hard disk, blocks all cookies or warns you before a cookie is saved. In the Help and Support area of your Internet browser, you will find information on how you can delete or block cookies. There, you will find instructions on how to find the file or directory in which cookies are stored.

In any case, please note that, if you completely deactivate the use of cookies, you may not be able to use all functionalities of our website to their full extent.

When you leave our website via a link or clicking a banner ad and thus are redirected to third-party sites, it may happen that the addressee of the target page you clicked will also store cookies on your device. We are legally not responsible for such cookies. As regards the use of such cookies and the information stored in these by our advertising partners, you may wish to compare their data privacy policies.

## **6. Online-Marketing-/ Analysis Measures**

On our website, we use online-marketing measures and tracking tools for analysing the behaviour of the users on our website. By means of this statistical recording, we intend to design our website appropriately and in a needs-based manner and continuously adapt it for you as our user, optimise its utilisation and enhance its attractiveness and functionality.

The use of the online marketing and tracking measures employed by us is carried out on the basis of Art. 6 para. 1 sentence 1 lit. f GDPR, section 15 sub-section 3 TMG (German Telemedia Act). Our aforementioned interests are justified within the meaning of the aforementioned provision.

### **a) Google Analytics**

For the purpose of appropriately designing and continuously optimising our web pages to respond to users' needs, we employ Google Analytics, a web analysis service offered by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland; hereinafter referred to as "Google"). The usage includes the operating mode "Universal Analytics". This makes it possible to assign data, sessions and interactions across several devices to a pseudonymous user ID and thus to analyse the activities of a user across all devices.

Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of our website will generally be transmitted to and stored by Google on servers in the United States. If IP anonymization is activated on our website, however, Google will shorten your IP address beforehand within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA where it will be shortened. We would like to point out that on this website Google Analytics has been extended to include IP anonymization in order to guarantee anonymous collection of IP addresses (so-called IP masking). The IP address transmitted by your browser as part of Google Analytics is not combined with other data from Google. You can

find more information on terms of use and data protection at <https://www.google.com/analytics/terms/de.html> or at <https://policies.google.com/?hl=de>

On our behalf, as the operator of this website, Google will use this information to evaluate your use/visit to our website, to compile reports on website activity and to provide us with other services relating to website activity and internet usage. This is the purpose of the data processing.

The justified interest in the data processing lies in the optimization of our web page, the analysis of the use and the adjustment of contents. The interests of the users are sufficiently protected by the pseudonymisation.

The personal data is transferred to the USA under the EU-US Privacy Shield on the basis of the adequacy decision of the European Commission. You can download the certificate from the following website: <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI>.

The data sent by us and linked to cookies, user IDs (e.g. user ID) or advertising IDs are automatically deleted after 14 months. Data whose retention period has been reached is automatically deleted once a month.

You can prevent the storage of cookies by setting your browser software accordingly; however, we would like to point out that in this case you may not be able to use all the functions of this website to their full extent. You can also prevent Google from collecting the data generated by the cookie and related to your use of the website (including your IP address) and Google from processing this data by downloading and installing the browser add-on (available at the following link <https://tools.google.com/dlpage/gaoptout?hl=en>). Opt-out cookies prevent the future collection of your data when you visit this website. To prevent Universal Analytics from collecting your data across multiple devices, you must opt-out on all systems you use. If you click here, the opt-out cookie will be set: [Disable Google Analytics](#)

#### b) MailChimp

For the dispatch of newsletters, we utilise the services of MailChimp, an offer of Rocket Science Group LLC, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA. MailChimp is a service which inter alia enables the organisation and dispatch of newsletters. When you input data for the purpose of receiving newsletters (e.g. your email address), these are stored on the servers of MailChimp in the USA. MailChimp has received a certification in accordance with the "EU-US Privacy Shield". The "Privacy Shield" is an agreement concluded between the European Union (EU) and the USA that shall guarantee compliance with European data protection and data privacy standards in the USA.

With the help of MailChimp, we are able to analyse our newsletter campaigns. When you open an email that has been sent by MailChimp, a file contained in the email (so-called web-beacon) establishes a connection to the servers of MailChimp in the USA. Thus, it is possible to determine whether a newsletter message was opened and which links, if any, were clicked. Moreover, technical information is recorded (e.g. time of retrieval, IP-address, browser type and operating system). We are not able to attribute this information to the respective recipients of the newsletters. They exclusively serve the purpose of statistical analysis of newsletter campaigns. We can use the results of these analyses to better adapt future newsletters to the interests of the recipients.

If you do not wish any analysis by MailChimp, you need to unsubscribe from the newsletter. For this purpose, we provide a relevant link in each newsletter message.

The data processing is performed on the basis of your consent (Art. 6 para. 1 lit. a GDPR), which you can revoke at any time. The lawfulness of the data processing procedures that have already taken place remains unaffected by such revocation.

The data stored by you with us for the purpose of receiving newsletters remain stored by us until your deregistration from the newsletter and will be deleted from both our servers and from the servers of MailChimp after you unsubscribe from the newsletter. Data, which have been stored by us for other purposes (e.g. email addresses for the member section), remain unaffected thereby. For more details, you may wish to consult the data privacy provisions of MailChimp at <https://mailchimp.com/legal/terms/>.

We have concluded a so-called "Data Processing Agreement" with MailChimp, in which we obligate MailChimp to protect the data of our customers and not to disclose them to any third parties.

## **7. Google reCAPTCHA**

For the protection of your inquiries by Internet form we use the service reCAPTCHA offered by Google Inc. The inquiry serves the differentiation whether the input takes place by humans or abusively by automated, mechanical processing. The query includes the transmission of the IP address and any other data required by Google for the service reCAPTCHA to Google. For this purpose your input will be transmitted to Google and used there. However, your IP address will be shortened by Google in advance within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On our behalf, Google will use this information to evaluate your use of this service. The IP address transmitted by your browser as part of reCAPTCHA is not merged with other data from Google. These data are subject to the differing data protection regulations of Google. For more information about Google's privacy policy, please visit: <https://www.google.com/intl/de/policies/privacy/>. You can find an opt-out option at the following link: <https://adssettings.google.com/authenticated>.

## **8. Social Media Plugins**

We have integrated Plugins to our Internet presences in the social networks Facebook and Instagram on our website. These social media plug-ins usually result in each visitor to the website being immediately captured by these services with their IP address. This logs all further activity on the Internet, even if you do not click on any of the buttons.

To prevent this, we use the so-called Shariff solution, which ensures that no personal data is initially passed on to the providers of the individual social media plug-ins when you visit our website. Only when you click on one of the social media plugins data can be transferred to the respective service provider and stored there. With the Shariff solution, the buttons of the individual providers are only integrated as a graphic, which contains a link to the individual social media services. A connection to the social media services is only established if you click on the respective button. After clicking on the button and forwarding to the website of the social network, the obligation to provide information no longer lies with us, but with the operator of the social network. Information about the collection and use of your data in the social networks can be found in the respective terms of use of the respective providers.

We have integrated the social media buttons of the following companies on our website:

Facebook (Facebook Inc., 1 Hacker Way, Menlo Park, California 94025, USA) – Privacy Policy: <https://www.facebook.com/about/privacy/>

Instagram (Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA) – Privacy Policy: <http://instagram.com/about/legal/privacy/>

## **9. Data Security and Data Privacy**

We endeavour to take any and all necessary technical and organisational security measures to store your personal data in such a way that they are not accessible by third parties or the general public. Should you wish to contact us by email, we would like to draw your attention to the fact that, when using this means of communication, the confidentiality of the transmitted information cannot be ensured in full. We therefore recommend that you send us confidential information exclusively by post.

## **10. Name and contact details of the responsible**

This data protection information applies to data processing by:

Responsible:

Sévigné Goldschmiede GmbH

Geschäftsführer: Jonas Fink

Promenadeplatz 10

80333 München