## FLORIUS FLOWERS PRIVACY POLICY

In order to preserve the right to privacy of the users of the floriusflowers.com (hereinafter referred to as 'Florius Flowers') platform and to meet the requirements of the law, publishes a document in which it explains and informs the manner in which Personal data provided by users (hereinafter referred to as 'Users') of the floriusflowers.com platform is collected, processed and secured in accordance to the General Data Protection Regulation (hereinafter referred to as 'GDPR')

Before the start of the use, the services or making registration, the User should familiarize with the content of this Privacy Policy.

This privacy policy sets out how Florius Flowers uses and protects any information that its users provide during the use of Florius Flowers' website and web shop. Florius Flowers is committed in ensuring that the privacy of its users is protected. Any identifiable information provided by the user to Florius Flowers will be used only within the scope of this privacy statement.

Florius Flowers may apply updates and/or changes to this document from time to time. Florius Flowers encourages its users to occasionally check and review this document to ensure that the provisions and policies remain satisfactory.

All provisions and policies stated herewith are effective as of July 2018.

### PERSONAL DATA COLLECTION AND PROCESSING

Providing Personal data by the User is voluntary, but the lack of some of them may prevent the user from registering on the web shop, using certain services, receiving a newsletter, buying products etc.

In order to register on the Platform, the User will be asked at least to provide the following:

- Name
- lob Title
- Company Related Information
- E-mail address
- Contact Number
- Bank related payment information
- Demographic information (ie. Postcode, preferences, and/or interests)
- Information relevant to customer surveys and/or offers

In addition, Florius Flowers will collect information on Users' interactions with its website and web shop, content and services including: device and login information, so-called system logs, including the date, time of the visit and the IP number of the device from which the connection was made, as well as data on the statistics of the Platform's traffic statistics, traffic to and from individual websites. The above activities are aimed at improving the Platform and tailoring services to the User's needs.

# **OBJECTIVES, LEGAL BASIS TIME OF PROCESSING OF PERSONAL DATA**

Users' data are processed in particular for the following purposes:

- Providing services to the User and access to the website and/or web shop
- Providing content and products to Users, including content/products tailored to their interests
- Measuring and improving content and services
- Informing about the services of Florius Flowers and content and products
- Sending a free newsletter with information on Florius Flowers products and/or promotions, provided that the User has previously agreed to receive marketing correspondence from Florius Flowers
- Ensuring the security of information processing in Florius Flowers
- Management of ICT systems
- Claims Request

To the extent to which User's Personal data are processed in order to improve the content and services of Florius Flowers, provide information on other Florius Flowers services, as well as provide personalized marketing content on the Platform, carry out research and analysis regarding products and services. The users may be contacted via phone, email, or by standard mail. The legal basis for the processing of Users Personal data is the legitimate interest of Florius Flowers. It is in the interest of Florius Flowers to provide, improve its services, ensure their best quality and inform Users about them.

## **SECURITY AND TRANSFER OF PERSONAL DATA**

Florius Flowers is committed to ensuring that the information of its Users is secure. In order to prevent unauthorized access or disclosure, Florius Flowers has put in place suitable physical, electronic, and managerial procedures to safeguard and secure all information collected online.

Florius Flowers, in principle, does not provide User's Personal data to third parties, except for situations in which Florius Flowers has a legal basis to do so, and at the request of entitled entities, or when it is necessary to perform services offered on its website and/or web shop. User's Personal data may be transferred to entities processing Personal data, among others, administrative, telco, payment, back office, legal service providers, as well as IT service providers, marketing agencies, etc. - these entities process data on the basis of a contract with the administrator and only in accordance with the administrator's instructions. The User's Personal data may also be transferred to entities authorized to obtain them on the basis of the applicable law, eg. law enforcement authorities in the event of a request being made by the authority on the appropriate legal basis (eg. for the needs of pending criminal proceedings). Users' Personal data may be transferred in certain cases to recipients from third countries, ie. from countries outside the European Economic Area, eg. if it is necessary for the provision of services to the User or if it will be conditioned by a different, important legal basis.

#### **RIGHTS OF THE USER**

The User has the following rights in relation to the processing of his Personal data by Florius Flowers:

## 1. The right of access to Personal data:

At the User's request, Florius Flowers will confirm what Personal data of the User Florius Flowers processes and provide the User with a copy of such data. In any case, the registered User has access to Personal data provided to Florius Flowers through the User's account on its website and/or web shop.

## 2. The right to rectify Personal data:

In case the User's Personal data is inaccurate or incomplete, the User may demand from Florius Flowers correcting or supplementing them. In any case, the registered User has the option of correcting User's Personal data through the User's account on the website and/or web shop.

# 3. The right to erase Personal data (in certain situations):

In certain situations, the User may claim Florius Flowers to remove Personal data processed by Florius Flowers (eg. when data is no longer required to provide services by Florius Flowers).

## 4. The right to limit the processing of the Personal data:

The User may demand in certain situations that Florius Flowers temporarily suspend processing of his Personal data (e.g., not sending marketing information to the email address provided). For example, a user may request to restrict the processing of his Personal data when he objects to the processing or when he questions the correctness of the data. Despite the restriction of processing, Florius Flowers will still be entitled to hold Personal Data.

### 5. The right to request the transfer of Personal data:

In certain situations (eg. in relation to data processed on the basis of consent), the User also has the right to receive Personal Data processed by Florius Flowers in a structured, commonly used machine-readable format to transfer this data to another Controller and/or system.

## 6. The right to object to the processing of Personal Data:

The User may demand that Florius Flowers cease processing his personal data when:
- Florius Flowers processes User's personal data based on the legitimate interest of his or her third party, except in situations where these interests are superior to the interests, rights and freedoms of the User

- User's data are processed for direct marketing purposes
- Processing includes automated decision making towards the User, including profiling

# 7. The right to lodge a complaint with the supervisory body dealing with the protection of personal data:

The User who is not satisfied with the way Florius Flowers processes Users Persona Data shall contact Florius Flowers at sales@floriusflowers.com and if the answer will not meet User's expectations, the User can file a complaint to the appropriate Personal Data Protection Authority in the User's country of residence.

# 8. The right to withdraw consent in the scope in which Personal data are processed on this basis:

The withdrawal of consent does not affect the lawfulness of the processing of the personal data in the period from the date of consent to the processing personal data until the date of withdrawal of this consent.

#### INFORMATION ABOUT 'COOKIES' AND OTHER SIMILAR TECHNOLOGIES

The website and/or web shop use mechanisms of automatic data storage-mechanism of the type: "cookies". They are used to better adapt the Platform to the needs of Users. For purposes of this policy, mechanisms for automatic data storage will be referred to as "Cookies". "Cookies" are files saved on the User's end device, used to identify the User's browser while using the Platform. They are used to provide Florius Flowers statistical information about Users 'traffic, Users' activity and the manner of using the Platform and its services.

They allow Florius Flowers to adjust the content and services to the User's preferences. Most "cookie" files are so-called session cookies that are automatically deleted from the hard disk after the session ends (that is, after logging out or closing the browser window). Some of the "cookies" allow the identification of the end device of the User when visiting the Platform again - they are not deleted automatically, they are saved on the end device. In the case of mobile devices, as in the case of stationary devices, the mechanism of accepting "cookies" has been used, which allows memorizing information related to a given User. A User who does not agree to such a way to monitor his behavior should express his opposition on the website of such an entity.

Overall, cookies help Florius Flowers provide its users with a better experience on its website and/or web shop by enabling Florius Flowers to monitor which pages its users find useful. A cookie does not and in no way give Florius Flowers access to its users' computer or any personal and/ or any identifiable information about its users, other than the data which was permitted by the user to be shared to Florius Flowers upon registration / sign-up.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser's setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website and/or web shop.

#### **HOW TO MANAGE BROWSER SETTINGS?**

In many cases, software used for browsing websites (web browser) allows for the storage of information in the form of cookies and other similar technologies by default in the User's end device. However, the User can change these settings at any time. Failure to change means that

the above information can be posted and stored on its end device, and thus Florius Flowers will store information on the User's end device and access this information.

From the level of the web browser used by the User, for example, you can manage cookies manually. The most popular browsers include possibility:

- accepting cookies, which allows the User to fully use the options offered by websites;
- cookie files management at the level of individual sites selected by the User;
- defining settings for various types of Cookies, for example accepting files as permanent as session, etc.:
- blocking or deleting Cookies.

Comprehensive information is available in the software (web browser) settings. Details for using particular browsers, i.e.:

- Internet Explorer
- Mozilla Firefox
- Chrome
- Opera
- Etc.

Please be advised that restrictions or exclusions of the use of cookies and other similar technologies may affect some of the functionalities available on the website and/or web shop. Additional information about cookies and other technologies can be found in the Help section in the browser menu.

### LINKS TO OTHER PARTIES WEBSITES

Florius Flowers' website and/or web shop may contain links to other websites of interest. However, once the user used said links to leave the site, the user should note that Florius Flowers do not have any control over that other website. Therefore, Florius Flowers will not be responsible for the protection and privacy of any information which the users provide whilst visiting such sites and such sites are not governed by this privacy statement. The users should exercise caution and look at the privacy statement applicable to the website in question.

### **CONTACT AND RIGHT TO BRING A COMPLAINT**

Questions, applications, and remarks regarding the principles of privacy policy and processing of User's personal data by Florius Flowers should be sent by e-mail to the following e-mail address: sales@floriusflowers.com.