



## **PRIVACY POLICY**

Protecting our visitors' and customers' privacy is very important to us. In this policy Root S.A. (further herein referred to as the 'provider') describes how information is collected, stored and processed. The provider is the personal data controller of the personal data provided by you. By continuing to use the website you confirm that you have read and understood this privacy policy. If you do not agree with anything that is mentioned in this policy please stop using the website.

### **Collected Information**

The following personal information may be collected, stored and processed:

- Information submitted and provided by the customer during the ordering process, such as name, e-mail address, postal address, phone number, company name and VAT number.
- Information about the visitor's computer and his visit to the provider's websites, like IP address, browser type and version, access date and time and the URL referring to the provider's websites. IP addresses are anonymized after they are no longer needed for technical and security reasons and such anonymized data may be used for statistical purposes.
- Financial information like credit /debit card number or other information depending on the form of payment used which shall purely be used for the purposes of processing your payment only.
- Information provided when contacting the provider for any information or for any other reason.

### **Usage of the collected information**

Any information collected by the provider may be used in one of the following ways:

- To process the customer's order and to perform the contract entered into between the customer and the provider for the provider's services;
- For billing purposes;
- To help verify accounts and activity, and to promote safety and security on our services, such as by investigating suspicious activity or violations of our terms or policies;
- To improve the browsing services on the provider's website and ensure that your selections on the website are remembered when selecting a service and navigating the website;
- To identify technical problems and detect fraud;
- To improve the provider's customer service;
- To deal with complaints made by or against the customer;



- To be able to answer and address any queries or communications received from the customer when the customer contacts the provider for any reason and in any manner;
- To comply with a legal obligation to which the provider is subject to;
- For the purposes of safeguarding the legitimate interests of the controller and any third parties in accordance with the provisions of applicable laws;
- Initiate, establish and/or defend legal claims.

Kindly note that if you do not provide us with the required data, then we will not be allowed to commence or continue our business relationship either to you as an individual or as the authorized representative/agent or beneficial owner of a legal entity.

### **Information Disclosure**

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. The provider does not sell, trade or otherwise transfer to outside parties the customer's personally identifiable information. This does not include trusted third parties who assist the provider in operating its website, conducting its business or servicing the customer and we have agreements for confidentiality and protection of personal data with such agreements in line with the provisions of applicable data protection laws. Whenever we transfer your personal data outside of the EEA, we ensure a similar degree of protection is afforded to it and that all third parties respect the security of your personal data and treat it in accordance with the law. The provider may also disclose information which it is necessary to comply with the law or regulation or judicial or other order which legally requires the provider to disclose the information and to enforce the provider's site policies or protect its or others' rights, property or safety.

### **Protection of information**

We endeavour to protect the security of your personal data. We use a variety of security technologies and procedures to try to protect your personal data from unauthorized access, use, or disclosure. For example, we store the personal data you provide on computer servers with limited access that are located in controlled facilities.

### **Retention period**

The provider will retain the personal data it processes for you for as long as necessary for the respective purpose of processing:

- For the personal data collect through the contact form - for the time necessary to prepare and send a reply to your inquiry and within 3 months of our last correspondence with you unless you become our customer in which case the relevant provisions of the terms of service or/ and the respective agreement signed between us shall apply regarding the processing of your personal data;



- For all other personal data, the provider will retain such personal data for as long as needed for the purposes it was originally collected as per applicable laws, resolve disputes and enforce its agreements.

## **Rights of Data Subjects**

In connection with the processing of your personal data by the provider you have the following rights:

(a) right to access - you have the right to confirmation as to whether or not the provider processes your personal data and, where the provider does, access to the personal data, together with certain additional information. Provided that the rights and freedoms of others are not affected, the provider will provide you with a copy of its personal data as permitted by applicable data protection laws.;

(b) right to rectification - you have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed;

(c) right to erasure - you have the right to the erasure of your personal data without undue delay in the following circumstances: 1) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; 2) you withdraw your consent to consent-based processing; 3) you object to the processing under certain rules of applicable data protection law; 4) the processing is for direct marketing purposes; and 5) the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: 1) for exercising the right of freedom of expression and information; 2) for compliance with a legal obligation; or 3) for the establishment, exercise or defence of legal claims;

(d) right to restriction of the processing - Where the provider is relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. If you lodge an objection, we will no longer process your personal data unless we can demonstrate legitimate grounds for the processing which override your interests, rights and freedoms.

(e) right to objection to the processing - you have the right to object to the provider's processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for one of the following: 1) the performance of a task carried out in the public interest or in the exercise of any official authority vested in the provider; or 2) the purposes of the legitimate interests pursued by the provider or by a third party. If you make such an objection, the provider will cease to process your personal data unless the provider can demonstrate compelling legitimate grounds for the processing which have priority over your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims;

(f) right to data portability - you have the right to receive your personal data from the provider in a structured, commonly used and machine-readable format;



(g) right to lodge a complaint with a supervisory authority - you have a legal right to lodge a complaint with the supervisory authority of one of the EU Member States, responsible for data protection. You may do so in the EU Member State of your habitual residence, your place of work or the place of the alleged infringement. You may find the contact details of the relevant Member States' supervisory authorities here: [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm) ; and

(h) right to withdraw the given consent - to the extent that the legal basis for the provider's processing of your personal data is consent, you have the right to withdraw that consent at any time. Such withdrawal will not affect the lawfulness of any processing performed before it. You may withdraw your consent by contacting us at the following e-mail address: [gdpr-officer@root.lu](mailto:gdpr-officer@root.lu)

You may exercise any of your rights hereunder in relation to the processing of your personal data by written notice to the provider at the address specified hereinabove or via e-mail at the following e-mail address: [gdpr-officer@root.lu](mailto:gdpr-officer@root.lu)

We shall do our best to reply to you without undue delay.

### **Third Party Websites**

The provider's websites may contain links to other websites. These websites have their own privacy policies and therefore please refer to those privacy policies on such websites as to what data is collected and the manner by which they are processed.

### **Cookies**

This cookie policy applies to the website and explains, inter alia, what are cookies, how cookies are placed on your device in order, how they shall be used and your options regarding these cookies.

A cookie is a small amount of data (a small file) sent to your computer by a website. In general, when you visit the website, cookies will be placed on your device that help us to provide you with a good browsing experience and also allow us to improve our website. We use cookies to collect information about your device, such as IP address, operating system and browser type. The types of cookies that we use are detailed below:

- **Strictly necessary.** These cookies help you to move around the website. For example, if you're required to sign into a website, the cookies identify you as being signed in and remember you so that you don't have to sign back in every time you move between website.
- **Functional.** We use these cookies so that website recall the choices you make. For example, these cookies are capable of recognizing if you've been to website before, so messages intended for first-time users are not displayed to you. We may also use functional cookies to tailor content or advertisements to match your preferred interest and to avoid showing you the same advertisements repeatedly.



## **How we use Cookies**

We use cookies to improve the quality of our service, including for storing user preferences, tracking user trends, and providing you with a better experience. We collect information on how you use our website, including details of your domain name and Internet Protocol address, operating system, browser, time spent on a page or content, and the route you took to navigate through the pages. When you send messages, publish content, post material, transmit information or email through our services, we may retain the same in order to process your inquiries, respond to your requests and improve our services. The provider uses cookies to inform us of a repeat visit. The cookie does not tell us who you are, your name, email address, or passwords.

## **Policy Changes**

The provider reserves the right to change its policy at any time to meet the needs of our customers, changing laws and new technology. Please, refer to the date at the end of this policy regarding the date of its last update.

## **Contacting the provider**

If there are any questions regarding policy you may contact the provider:

Root S.A., 3 op der Poukewiss 7795 Roost Luxembourg or via email at [info@root.lu](mailto:info@root.lu)

This policy was last modified on: 30th April 2020