

# Privacy policy So Cute!

## **About our privacy policy**

So Cute! cares greatly about your privacy. We exclusively process data that we need for (improving) our services, and carefully handle all information gathered about you and your usage of our services. Your data is not shared with third parties for commercial goals. This privacy policy applies to the use of the website and the services provided by So Cute!. The starting date for the validity of these terms and conditions is 06/04/2019, with the publication of a new version the validity of all previous versions is canceled. This privacy policy describes what information about you is collected by us, what this data is used for and with whom and under what conditions this data could be shared with third parties. We also explain to you how we store your data, how we protect your data against misuse and what rights you have regarding the personal data you provide us. If you have any questions about our privacy policy, please contact our privacy contact person, you will find the contact details at the end of our privacy policy

## **About the data processing**

Below you can read how we process your data, where we save it, what security techniques we use and to whom the data is visible.

## **Webshopsoftware**

### **WooCommerce**

We use webhosting and email services provided by WooCommerce, For our webhosting we use the services of OtherHostnet. Personal data gathered with the use of our website and services is shared with OtherHostnet requires access to these details to offer (technical) support. They will not use this data for any other purposes. OtherHostnet has an obligation, based on the agreement we have with them, to take necessary precautions and security measures when it comes to your personal data.

### **WooCommerce**

Our webshop has been developed using WooCommerce software, We host our webshop on a server under own management. We have taken necessary precautions and security measures when it comes to your personal data such as an SSL-encryption and a strong password policy.

## **E-mail and mailinglists**

### **MailChimp**

We use the email services of MailChimp, a third party that facilitates our websites email-traffic and possible newsletters. Any conformation email you receive from our website and webforms are sent to you from the servers of MailChimp. MailChimp will not use your name and email address for their own purposes. At the bottom of each automated email sent from our website you will find an 'unsubscribe' link. When you click on this link you will no longer receive automated emails from our website, note that this can affect the functionality of our website greatly. Your personal data will be securely stored, sent and locked by MailChimp. MailChimp uses cookies and other internet technologies that track if emails are opened and read. Additionally, MailChimp gathers information about you as a receiver and the subjects of these emails with the purpose of improving the quality of their service, this data is stored for 30 days. MailChimp retains the right to use your personal information to further improve their services and, within this context, share it with third parties.

### **My webhost**

For our regular business email, we use the email services of My webhost. This party has implemented fitting technical and organisational measures to prevent misuse, loss or corruption of your data. My webhost does not have access to our mailbox and we treat our email-traffic confidentially.

## **Payment processors**

### **Mollie**

For concluding and processing (part of) our payments in our webshop we use the payment provider Mollie. Mollie processes your name, address and residence information. They also process payment information such as your bank account number or credit card number. Mollie has implemented fitting technical and organisational measures to protect your personal data. Mollie retains the right to use your personal (anonymized) information to further improve their services and, within this context, share it with third parties. All the aforementioned guarantees in regard to the protection of your

personal data are also applicable to any services by Mollie that uses third parties. Mollie does not store your data any longer than the instalments permitted by the appropriate legal grounds.

### **Transport and logistics**

#### **PostNL**

If you place an order with us it is our responsibility to have your order successfully delivered to you. For the delivery we use the services of PostNL. For a successful delivery it is important that we share your name, address and residential details with PostNL. PostNL uses this information with the sole purpose to carry out the agreement of delivery. In case of PostNL hiring subcontractors, they will share said information with these parties

### **Accounting and Bookkeeping**

#### **MoneyBird**

For our accounting, administration and bookkeeping we use the services of MoneyBird. We share your name, address, residential details and general details concerning your order/purchase. This data is used for the administration of sales invoices. Your personal data is securely sent and stored, MoneyBird has implemented fitting technical and organisational measures to protect your personal data against loss or unauthorised use. MoneyBird is obligated to a duty of confidentiality and will treat your data accordingly. MoneyBird does not use your personal data for any other purposes other than those previously described above.

### **External sales channels**

#### **General purpose of the processing**

We use your data with the sole purpose of providing you with our services. This means that the goal of processing this data stands in direct relation to the assignment or task that you offer us. We do not use this data for (addressed) marketing purposes. If you share information with us and we use this information to - not based on a request – contact you at a later time, we will first ask for explicit consent. Your data is not shared with third parties, with any other purpose than to fulfil accountancy and administrative obligations. These third parties are all obligated to a duty of confidentiality based on the agreement we have with them, an oath or legal obligation

#### **Automatically collected data**

Information automatically gathered by our website is processed with the sole purpose of providing you with and/or to further improve our services. This information (for instance your IP address (anonymised), web browser and operating system) is not personal information.

#### **Cooperation with tax and criminal investigations**

In some cases, we may be obligated by government to a lawful duty of sharing your information with the purpose of assisting in a fiscal or criminal investigation. In such cases we are forced to comply and assist, but will, based on lawful possibilities, offer objection.

#### **Retention periods**

We store your data for as long as you are a client with us. This means that we maintain and keep your client profile until you make it known to us that you no longer desire to use our services. Such a message also functions as a request to be forgotten. We are required to keep invoices with your (personal) information due to relevant administrative obligations, this information is safely stored for as long as the relevant term for these obligations has not yet passed. Personnel no longer has access to your client profile and any documents made because of your assignment or task.

### **Your rights**

Based on valid Dutch and European law you, as a concerning party, have certain rights when it comes to personal data that is processed by or on behalf of us. Below you may find an explanation of these rights and how you, as a concerning party, can invoke these rights. In principle to prevent abuse we only send invoices and copies of your data to e-mail addresses that you have made known to us. Should you wish to receive this data on another e-mail address or for instance per mail we will ask you to identify yourself accordingly. We maintain an administration of concluded requests, in case of a request to be forgotten we will maintain an administration of anonymised data. You receive all invoices and copies of data in files that are structured in a machine-readable format Based on data

classifications that we use within our system. At all times you maintain the right to lodge a complaint with Autoriteit Persoonsgegevens if you suspect that we mistreat or misuse your personal data.

#### **Right of inspection**

At all times you maintain the right to view the data we process that has a relation or may be reducible to your person. You may request such a viewing to our contact in charge of privacy matters. You will receive a response to your request within 30 days. If your request is approved we will send you, via the e-mail address known to us, a copy of all data with an added overview of processors managing this data while also mentioning the categories under which we store this data.

#### **Right to rectification**

At all times you maintain the right to have the data we process that has a relation or may be reducible to your person be adjusted. You may request such an adjustment to our contact in charge of privacy matters. You will receive a response to your request within 30 days. If your request is approved we will send you, via the e-mail address known to us, a confirmation that the data has been adjusted.

#### **Right to restriction of processing**

At all times you maintain the right to limit the data we process that has a relation or may be reducible to your person. You may request such limiting to our contact in charge of privacy matters. You will receive a response to your request within 30 days. If your request is approved we will send you, via the e-mail address known to us, a confirmation that the processing of your data is limited until you chose to cancel said limitation.

#### **Right of transferability**

At all times you maintain the right to request for the data we process that has a relation or may be reducible to your person be processed by a third party of choice. You may send in such a request to our contact in charge of privacy matters. You will receive a response to your request within 30 days. If your request is approved we will send you, via the e-mail address known to us, your (personal) invoices or copies of data that we, or third parties on behalf of us, have processed. It is highly likely that in such a case we can no longer offer our services to you for we can no longer guarantee the previous data safety.

#### **Right of objection and other rights**

At all times you maintain the right to object to the processing done by us, or on behalf of us by third parties, of your personal data. In case of such an objection we will immediately cease all processing of your data while your objection is being investigated and handled. In case of a justified objection we will return all invoices and/or copies of personal data that we, or third parties on behalf of us, have processed up until that point and cease processing thereafter. You also maintain the right to not be subject of automated decision-making processes or profiling. We process your data in such a way that this right does not apply. Should you believe that this right does apply then we ask you to reach out to our contact in charge of privacy matters.

#### **Cookies**

##### **Google Analytics**

Cookies from the American company Google are placed through our website as part of the "Analytics" service. We use this service to keep track of and get reports on how visitors use the website. This processor may be required to provide access to this data on the basis of applicable laws and regulations. We collect information about your surfing behavior and share this data with Google. Google can interpret this information in conjunction with other data sets and in this way follow your movements on the internet. Google uses this information to offer targeted advertisements (Adwords) and other Google services and products, among other things.

##### **Cookies from third parties**

In the event that third party software solutions use cookies, this is stated in this privacy statement.

##### **Privacy policy changes**

At all times we maintain the right to alter our privacy policy. This page however always displays the most recent version of our privacy policy. Should a new privacy policy have consequences for the ways in which we process recently gathered data in regard to your person, then we will notify you of this via e-mail. Company details

##### **Contact details**

So Cute! 78, Grassavanne 5658EV Eindhoven the Netherlands (this is not a visiting address)  
E info@socutefashion.com  
**Contact person for privacy matters**  
Esther de Zeeuw