

**Privacy policy related to the processing of personal data on
www.EshopWedrop.co.uk website
 (the “Privacy Policy”)**

Within the Eshopwedrop (“ESWD”) network, we respect your privacy. This Privacy Policy describes the types of personal information we collect about customers, how we may use the information, with whom we may share it, the measures we take to safeguard personal information, how we handle your rights to your personal data when you ask us to (i) access or change the personal information we keep about you, (ii) withdraw consent you previously provided to us, (iii) restrict the processing we carry on your data, or (iv) refrain from sending you certain communications. It also describes how we ensure the portability of your personal data, deal with deletion of your personal data and answer questions you may have about our privacy practices.

This Privacy Policy explains how our ESWD platform (operating under a service franchise model), referred to in this Privacy Policy as “we”, “ESWD”, “our” or “us”, processes the personal data of the Users (“Users”, “you”, “your”) visiting and accessing the website www.EshopWedrop.co.uk (the “Website”), and purchasing and using the Services available through the Website (the “Customers”).

Unless otherwise defined in this Privacy Policy, the terms used in capital letters shall have the meaning assigned to them under the *GENERAL TERMS AND CONDITIONS AND SPECIFIC ON-LINE SALE SERVICES TERMS*, available on the website (the “T&C”).

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| <p style="text-align: center;">Controller of your personal data (determines the purposes and means of the processing of personal data)</p> | <p><u>EshopWedrop LTD, organized and existing under the laws of England and Wales, with the registered office located at 700 Avenue West, Skyline 120, Great Notley, Braintree, Essex, CM77 7AA, UK, registered with the Company registration number: 08429573.</u>, the owner of the EshopWedrop franchise business, as well as of the EshopWedrop platform, acts as the <i>Controller</i> of your personal data. The company may be referred to as “the Franchisor” in this Privacy Policy.</p> <p><u>EshopWedrop LTD</u> has appointed, as franchisee for The United Kingdom, the company ISE Logistics LTD, as the Services Provider (according to the Terms and Conditions), which acts as the <i>Processor</i> of your personal data. ISE Logistics LTD has been appointed by EshopWedrop LTD to operate the Website and provide the Services traded through the Website (the “E-Shop”), using the ESWD platform, in accordance with the strict instructions of the Controller.</p> <p>Through the Website / the E-Shop, the Service Provider communicates with the Users and is authorised by the Customers to perform the Services in accordance with the T&C.</p> <p>When accessing the ESWD platform and the IT system, and when ensuring their development, functioning and performance, as well as the development of the franchise network under its brand-name and</p> |
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| | <p>trademarks, the Franchisor accesses and processes your personal data, acting in its turn as controller of your personal data.</p> | |
| <p>Purpose of the Privacy Policy</p> | <p>Through this Privacy Policy, the Controller informs the Users/Customers, as personal data subjects, about the processing by the Controller (including collection, sharing, retention) of the Users'/Customers' personal data, when the Users'/Customers' use the Website/E-Shop and access the ESWD platform when the Customers use the Services provided by the Service Provider. This Privacy Policy shall apply to the personal data processing performed by the Service Provider, when the Users/ Customers access the Website and, if applicable, use the Website for ordering Services.</p> | |
| <p>What is personal data</p> | <p>Any data or information that helps us to identify the data subjects (the Users/Customers). Some data allows us to directly identify the data subjects (<i>e.g.</i> your name and surname). Other information is less obvious (<i>e.g.</i> the IP of the device you use for surfing on the Website, the MAC address of your computer this data or mobile phone). However, when associated with other elements, this data helps us identify the data subjects and is therefore also treated also as personal data.</p> <p>We do not directly collect and/or process in any way special categories of data (<i>e.g.</i> data about health, unique identification numbers, biometric data, etc.).</p> <p>Some of our processors ensuring us support in completing our <i>Know Your Customer</i> procedure may collect directly from the data subjects and process certain personal data from ID documents (<i>please refer to the section below referring to the Know Your Customer procedure</i>).</p> <p>We do not request, collect, or process personal data of minors. If we identify that personal data of minors has been accidentally collected/processed, such data will be immediately deleted.</p> | |
| <p>Data subjects categories (to whom does the personal data belong to)</p> | <p><u>User</u>, <i>i.e.</i> any natural person of at least 18 years that intentionally accesses and uses the Website, irrespective of whether they wish to set-up the Account and (or) place an Order and (or) benefit from the Website in any other way;</p> <p><u>Customer</u>, <i>i.e.</i> any User (natural person of at least 18 years old / legal entity organized and existing according to the laws of its home country) who (a) registers with the Website; and (b) places an Order and enters into a Distance Contract according to the T&C;</p> <p><u>Representatives</u> of Users/Customers - legal entities; and</p> <p><u>Persons' authorized</u> to pick-up/receive/hand over Parcels, in the name and on behalf of the Customer.</p> | |
| <p>How do we process your personal data?</p> | <p>What personal data of the data subject do we collect and how do we process it? (information we obtain)</p> | <p>What is the legal ground for our personal data processing?</p> |

Personal data provided directly by the data subject / collected automatically

Setting-up the Customer Account

- First stage:
 - e-mail

- Second stage:
 - name and surname
 - phone number
 - email
 - preferred language
 - ESWD Customer Code/Client ID (*i.e.* the unique customer code assigned to the User upon setting-up the Account)

Setting-up an Account on the Website is necessary for ordering Services through the E-Shop. Such mandatory data is needed for us to perform contracts for delivering the Services. A data subject's refusal to provide the personal data indicated as mandatory means the data subject will not be able to place orders for Services in the E-Shop.

Optional data in the Account:

- gender
- areas of interest.

The same data is collected when the data subject acts as representative of a legal entity and intends to place orders in the name of such legal entity he/she is authorised to represent when ordering Services; additionally, the name, surname and position of the contact person acting on behalf of the legal entity for the performance of the contract for Services is also provided by the data subject.

The User's email address is processed when they receive confirmation of the set-up of their Account.

Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract

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| | <p>The e-mail of Users is also processed when they receive e-mails requesting further input for completing Account set-up, in order to be able to place orders.</p> | |
| <p>Completion of the mandatory <i>Know Your Customer</i> procedure</p> | <p>The following personal data are collected directly from data subjects by the online payment provider (<u>this data is used by the online payment provider solely for identifying the User/Customer according to the KYC procedure detailed in the Terms and Conditions</u>).</p> <ul style="list-style-type: none"> ➤ The online payment method (also valid for bank transfers): <ul style="list-style-type: none"> - user name (declared in user account); - user surname (declared in user account); - user email (declared upon registration); - amount and currency of the payment; - country code; - identification reference (generated by ESWD system) - bank code. ➤ The iDenfy method: <ul style="list-style-type: none"> - ESWD client ID; - user name (declared in user account); - user surname (declared in user account); - language code; - country code. <p>iDenfy directly collects from the User the photograph and the ID document / Passport (the User's name, surname, gender, ID document number, ID number, birth date, ID document expiry date, photo</p> | <p>a) Legitimate interest of the Franchisor of preventing fraudulent activity of Users/Customers</p> <p>ESWD legitimate interest for the collection/processing of the data within the KYC procedure lies in preventing fraudulent activity (including the misuse of the Services for committing fraud and/or criminal acts), as well as in ensuring the security of ESWD system and the goods of our other users'/customers'. The nature of the data used and the KYC purpose for which it is used, leads to a limited impact on the privacy of the data subjects (i.e. the Users).</p> <p>Should the rights and interests of the Users outweigh ESWD legitimate interests and should ESWD become aware of that, ESWD will cease processing the users' data involved, in accordance with the relevant legal provisions, including GDPR.</p> <p>b) The observance of legal obligations imposing identification of users/customers (applicable</p> |

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| | <p>on the ID, face photo, citizenship, ID date and method; iDenfy does stores and uses this data solely for performing the KYC procedure; likewise, iDenfy does not log this data into the ESWD system, nor does it directly send it to the controller.</p> <p>During the KYC procedure, the Controller receives from the third-party processor (e.g. in the call-back) the following:</p> <ul style="list-style-type: none"> ➤ The online payment identification method: <ul style="list-style-type: none"> - User's name and surname; - The amount (and currency) paid by the User in the KYC procedure; - Bank title or BIN number - Identification reference. ➤ The iDenfy identification method: <ul style="list-style-type: none"> - ESWD client ID; - unique reference number; - status (<i>Approved</i> or <i>Denied</i>). <p>During the KYC procedure, the Controller may receive from the third party processor personal data collected from a person other than the User (i.e. in the case where the User/Customer does not make the online payment from their personal bank account, but from a third party's bank account). Such data is not collected/processed on purpose by the controller or by the third party processor and the T&C specifically require that the User/Customer makes the payment from their personal bank account and not from the bank account of a third party. Such personal data is not kept by the controller / ESWD system / third party processor for any other purpose than the completion of the KYC procedure. The User/Customer is informed on the failure of the KYC procedure, in case the online</p> | <p>in certain franchisees' countries)</p> |
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| | <p>payment is made from a bank account belonging to a person other than the User/Customer themselves.</p> <p>The ESWD system sends to the User / Customer whose identity is confirmed, the invoice for the amount paid during the KYC procedure; the personal data used in the invoice are: User's name and surname, (as evidenced by the online payment mechanism). ESWD systems communicates to the User/Customer, by using their e-mail address, the debit note for making the bank transfer (in case this was the identification method preferred by the user/Customer). ESWD also sends by e-mail the invoice for the paid amount.</p> | |
| <p>Placing Orders for Services / Return Mandate Services and conclusion of distance contracts for Services / Return Mandate Services</p> | <p>Upon arrival of a Parcel at the Origin Warehouse / arrival of a Returned Parcel at the Destination Warehouse, the following data is processed in the ESWD platform:</p> <ul style="list-style-type: none"> • ESWD Customer Code; • name and surname; • email; • telephone number. | <p>Performance of the (distance) contract</p> |
| <p>Performance of the distance contract with respect to a Parcel / Returned Parcel (including ensuring exercise of the Customer's right of withdrawal)</p> | <p>Upon acceptance of the Parcel / Returned Parcel by the Service Provider at the Origin Warehouse / Destination Warehouse and notification to Customer of Order acceptance, the following personal data is processed in the ESWD platform:</p> <ul style="list-style-type: none"> • ESWD Customer Code; • name and surname; • email; • telephone number. <p>The same personal data is processed when the following actions are undertaken in accordance with the contract arising under the T&C:</p> | <p>Performance of the (distance) contract</p> |

- storage of the Parcel / Returned Parcel in the Origin Warehouse / Destination Warehouse;
- re-packaging of Parcels / Returned Parcels, according to the T&C;
- customs formalities undertaken in the name and on behalf of the Customer (if required according to applicable law) – additional data may be processed in this case: *i.e.* order, invoice for the Product, a personal statement from the User regarding the contents of Parcel, signature, correspondence required to complete customs formalities, as requested by the User;
- road transportation of the Parcel / Returned Parcel;
- storage of the Parcel / Returned Parcel in the Destination Warehouse / Origin Warehouse;
- informing the Customer (by e-mail and/or in his/her Account) about the Parcel / Returned status as follows: in Origin Warehouse / in Destination Warehouse, in Transit, in Intermediary Warehouse, in Destination Warehouse / in Origin Warehouse, in Consolidation/ to be picked-up by the Customer, Picked-up by the Customer, in Consolidation /to be delivered to Courier, Picked-up by Courier, in Consolidation/to be delivered to Click-and-Collect point/picked up by the Customer/Customer's representative;
- issuing invoices for the fees for Services / Return Mandate Services and for any other applicable fee (*e.g.* for customs clearance).

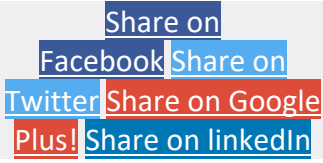
Personal data regarding financial transactions (*e.g.* details of payment cards) are not available / kept in the ESWD

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| | <p>platform. The Customer's IBAN may be requested in exceptional cases (<i>i.e.</i> the Customer has exercised their right to withdraw and must be reimbursed for the amounts already paid, in which case an Order is cancelled after the due amounts have been paid by the Customer); however, such data is not retained/stored in the ESWD platform and deleted as soon as the reimbursement is complete.</p> | |
| <p>Customer care services</p> | <p>For providing Customer care services with regard to your Account / Order for Services / Return Mandate Services, the following data is processed, mainly to identify the Customer:</p> <ul style="list-style-type: none"> • name and surname; • e-mail address; • phone number; • ESWD Customer Code. <p>We may process / record, with your prior specific consent, your voice in the phone discussions we have, in order to provide support as per your request.</p> <p>We may process the same data for resolving any claims you make with respect to the Services / Return Mandate Services.</p> | <p>Performance of the (distance) contract</p> |
| <p>Handing-over the Parcel / Returned Parcel to the Customer/Customer's representative/authorised person</p> | <p>Upon delivery of the Parcel / Returned Parcel to the Customer/Customer's authorised representative, the following personal data is processed:</p> <ul style="list-style-type: none"> • name and surname; • telephone number; • ESWD Customer Code; • delivery address (if applicable). <p>Upon delivery of the Parcel / Returned Parcel to the Customer/Customer's authorised representative, the</p> | <p>Performance of the (distance) contract</p> <p>Our legitimate interest of preventing potentially opt out of fraudulent actions</p> <p>The Customer may opt out at any time the processing of such data, by sending an e-mail to the following address UK@eshopwedrop.com, on grounds relating to his or her particular situation. The</p> |

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| | <p>Customer/Customer's representative may be asked to present valid identification documents (they can be asked to show ID solely for identification purposes. In order to avoid fraud, no copies or pictures of such ID papers are kept/stored).</p> <p>Validation of the Customer's/Customer's authorised representative's identity is also required by law under money laundering and associated regulations.</p> <p>The same personal data of the Customer/Customer's authorised representative is processed by means of the paper documentation kept by the last mile delivery service provider, upon the instructions of the Service Provider.</p> | Customer's data will no longer be processed in the ESWD platform. |
| General commercial communications (weekly newsletters) | Sending to Users/Customers general e-mail communications (newsletters) regarding EshopWedrop Services. | Your prior consent You can withdraw at any time your consent to receiving such materials, by clicking on the unsubscribe link, at the end of every newsletter. |
| Reminders about status of Customer Account | Sending to the Customer reminders by e-mail on the status of their Account (e.g. "no ordering activity in the last 1 month"), or emails regarding similar EshopWedrop Services available on the Website, in cases where Customer has already ordered Services and given its e-mail address to us for this purpose. | Our legitimate interest The Customer may at any time opt out of receiving such e-mails, by clicking on the unsubscribe link, at the end of every such email. The Customer's data will no longer be processed in the ESWD platform in accordance with legal requirements. |
| Vouchers | The Customer may receive loyalty vouchers (discounts / benefits). Such vouchers are visible in the Customer's Account. | Performance of the contract / Our legitimate interest |
| Unilateral termination of a distance contract | The e-mail address/any other address of a Customer breaching the distance contract (e.g. the Parcel does not meet the mandatory elements as per the Terms and Conditions), may be processed in order to | Performance of the (distance) contract |

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| | send them a notification of termination of the distance contract for default. | |
| <p>Indemnification of the Customer as per T&C</p> | <p>The following data is processed when compensating the Customer based on T&C standard rules or on contractual guarantee services:</p> <ul style="list-style-type: none"> • name and surname; • telephone number; • email address; • ESWD Customer Code; • invoice as proof of purchase; • bank statement confirming the amount paid by the Customer / online order placed for the Product. <p>No financial data of the Customer (e.g. IBAN code) is retained on the ESWD platform.</p> | <p>Performance of the (distance) contract</p> |
| <p>Commercial communication based on customer segmentation (profiling)</p> | <p>Based on the social interests you choose to share with us by personalizing your Account (e.g. hobbies, age, other personal interests etc.), we may prepare and send to you (including by using third party partners specialized in such processes), to your e-mail, customized offers regarding Services that we may offer in connection with products/services you may be interested in, including shopping tips (“Customized Offers”), based on the segments/customers profiles we create. However, we shall send such Customized Offers only with your specific consent to receive such offers.</p> <p>We may use such segmentation to send to you surveys asking for your feedback regarding various interactions you’ve with us, aimed at improving our Services.</p> <p>We may generate such segments based on combining the information you choose to share with us in your Account, with the cookies placed according to our Cookies Policy available on the Website.</p> | <p>Your prior consent is required</p> <p>For segmentation/profiling in order to send Customized Offers through your chosen means (e-mail, SMS).</p> <p>You can withdraw your consent at any time, including your consent to segmentation/profiling for marketing purposes, by clicking on the unsubscribe link at the end of every such email.</p> <p>We will stop sending you such material.</p> <p>Our legitimate interest of aiming to constantly improve our services further to your answers to our surveys.</p> <p>You can opt out of receiving invitations to take part in such</p> |

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| | | surveys, by clicking on the unsubscribe link at the end of every such email, on grounds relating to your particular situation. The Customer's data will no longer be processed for this purpose on the ESWD platform. |
| Audit and reporting | <p>We may process personal data of our Customers for annual financial audit, reporting and other fiscal obligations.</p> <p>We also process personal data on the ESWD platform for generating reports aimed at improving our franchise business model.</p> | <p>Legal obligations When required under the law, for meeting specific tax obligations.</p> <p>Our legitimate interest of improving the franchise business model under which we operate.</p> |
| Protecting our rights in the court of law / arbitration court | When we enforce our rights in a court of law / arbitration court (e.g. for recovering bad debts), or defending claims, we shall process Users'/Customers' data to the extent necessary to prepare and support our legal actions. | Our legitimate interest of protecting/enforcing our rights and defending claims. |
| Procedures and investigations carried out by official authorities | Strictly in accordance with the law, in exceptional situations, we may provide to the competent authorities, in the process of official proceedings/investigations or other legal processes, the following personal data: name and surname, address, e-mail, telephone number, Parcel details (e.g. investigations regarding contents of Parcels), banking details in our possession (e.g. in case of suspicion of fraud). | Our legal obligations |
| Cookies | Please refer to our Cookies Policies for details regarding the use of Cookies on the Website, along with the mechanisms under which you can take action regarding Cookies. | Consent to Cookies |
| Different actions of the User / Customer on the Website | | |

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|  | <p>Share Social plugins are tools made available by social media platforms that let you share your experiences on our Website with your friends on Facebook / Twitter / Goole Plus / linkedin.</p> <p>Our Website doesn't receive the information that appears in the plugin; we are / are not automatically notified about actions you take within the plugin. For example: if you use the <i>Share on Facebook</i> plugin to share the <i>Contact</i> section of our Website, the Website may be able to connect your share to your profile on Facebook.</p> <p>Unless you are already logged into the relevant social platform account when visiting our Website (<i>e.g.</i> Facebook), you will be asked to log into your account before you can use the plugin.</p> <p>We do not store your profile as entered on the social media platform, or other information from your profile.</p> <p>By making available the <i>Share</i> buttons on our Website, we do collect personal data.</p> | <p>Our legitimate interest</p> |
| <p>Clients (Customers) reviews</p> | <p>You can send us feedback on your experience with our Website / Services / Return Mandate Service, by placing reviews on the dedicated section on the Website.</p> <p>If you choose to reveal your name, we also indicate the country from which your rate our service. The personal remarks you make in this section are published on the Website and are therefore scrutinized so that they comply with laws about public posts.</p> | <p>Our legitimate interest</p> |

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| | <p>We do not collect / store in this process your profile on social media platforms, or any other personal data belonging to you.</p> <p>If the User/Customer sends any other personal data, along with the review, which is not requested, we will immediately delete such personal data and will not in any way store it.</p> <p>The social media platform receives information about your Account when you log onto our Account via the social media platform.</p> | |
| <p>Find us on Facebook, Google Plus, Twitter, YouTube, Pinterest, LinkedIn</p> | <p>If you are registered with your account on any social media platform and click the relevant pictogram, you will be directed to our profile on the respective social media platform.</p> <p>We do not collect / store in this process your profile on such social media platforms, or any other personal data belonging to you.</p> <p>The social media platform receives information about your Account when you log onto our Account via the social media platform.</p> | |
| <p>Register for our Newsletter</p> | <p>If a User gives us their consent to receiving our general commercial communication newsletter, we only process the User's e-mail in order to send them the general newsletter.</p> | <p>User's prior consent User can withdraw consent at any time, by accessing the Unsubscribe link shown in every newsletter.</p> |
| <p>Contact us</p> | <p>Any User can contact us with any query about our Services, by sending a message via the "Contact Us" section on the Website; we collect their name, email address, the telephone number and their message. We keep this data exclusively for responding to the User and do not use the</p> | <p>Our legitimate interest as online business</p> |

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| | <p>personal data for any other purpose. Personal data collected via “Contact Us” is deleted within maximum 6 months, unless we keep them for legal grounds.</p> | |
| <p>Website maintenance and security</p> | <p>We use the following online identifiers for ensuring security of the Website:</p> <ul style="list-style-type: none"> • User IP address; • MAC address; • Internet browser and version of operating system of the device used for accessing the Website; • HHTP/HTTPS protocol data; • Location of the device (only if the device has a geographical function and the geo-location function is activated and used for accessing the Website). <p>More precisely, we process this data for (i) ensuring the better functioning of the Website, specifically for:</p> <ul style="list-style-type: none"> • accurate publishing of the contents of the Website; • retention of the authentication details (upon the User’s request); • improving the Website; • aligning the device with the requirements of the Website; and for (ii) ensuring the security of the Website and its protection against fraud or other IT security breach with respect to the Website / E-Shop and for (iii) identifying and remedying errors preventing the use of the Website or of the Account. | <p>Our legitimate interest</p> |
| <p>Recipients of the data</p> | <p>The following are recipient of the data:</p> <p>When involved in correspondence with our Users/Customers, or when performing our obligations and responsibilities as per the distance contract with customers, the recipients of personal data may be the data subjects of that data.</p> <p>ESWD companies (members of our network) effectively involved in the performance of the Customer’s distance contract for Services / Return</p> | |

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| | <p>Mandate Services, including in the business processes and operation of the IT systems supporting the ESWD platform and the operation of the franchise business. We only share the data necessary for carrying out the operations needed to ensure the delivery of the Services / Return Mandate Services, <i>i.e.</i> the Service Provider, franchise owner, Origin Country warehouse entity, logistic companies, land transportation company, destination warehouse company, last mile delivery services providers.</p> <p>We may share such data with third party contractors (not-members of our franchise) for the performance of the contract for Services / Return Mandate Services (<i>e.g.</i> Mail Chimp, Facebook, Google, iDenfy, online payment provider (Know Your Customer procedure)).</p> <p>We use specific and strict rules when selecting our partners/third party contractors, to ensure protection of personal data and compliance with data privacy rules, including GDPR rules.</p> <p>In exceptional cases where relevant authorities (<i>e.g.</i> customs, police) request, in accordance with legal provisions, access to data for carrying out public tasks in accordance with their powers, we may share data in official investigations on fraud or other suspicious conducts. We may also present personal data in a court of law, when defending claims.</p> <p>If we undergo a reorganization or a purchase/sale procedure, we may share your data with third parties involved in such procedures (including auditors, consultants), during audits performed on our activities / business / companies. We will ensure such third parties are obliged to keep data secure and implement necessary measures to ensure security of data.</p> |
| <p>Retention of data</p> | <p>Users'/Customers' personal data (including history of orders) are kept in the IT system for 3 (three) years since the last Order for Services/Return Mandate Services placed on the Website (but in any case no longer than necessary). After that term, personal data legally required to be kept for longer periods (<i>e.g.</i> financial documents, invoices) shall be kept securely in accordance with the relevant legal provisions.</p> <p>Accounts that are not used for a 12-month period, are de-activated and corresponding personal data is deleted / anonymized (so that the data subject can no longer be identified), unless we are obliged by law or our legitimate interests to do otherwise. We shall notify the User/Customer in advance of the de-activation of the Account.</p> |

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| | <p>Accounts where registration is not completed are deleted after 6 (six) months, if the User has not completed the registration, even after receiving 3, (three) reminders to complete the Account.</p> <p>As regards the data used with the prior consent of the data subject, we will process this data for that purpose only until the User/Customer withdraws their consent, unless we are obliged to keep such data for a longer period, according to law, for investigations made by relevant authorities or in order to defend our rights.</p> <p><i>*Consent</i> – means the free, specific, informed agreement of the User/Customer, where they unequivocally agree to their data being processed by us for the specific purpose they are consenting to.</p> |
| <p>Security</p> | <p>We ensure we have in place the technical and organizational measures necessary to collect, process and keep the personal data securely, including against un-authorized access and use of data. Such measures include:</p> <ul style="list-style-type: none"> - administrative and organizational measures to ensure persons accessing the data keep it confidential; - flows and operational procedures for ensuring data subjects' exercise of rights; - security of data hosting environments; - ensuring by reasonable measures that our partners/subcontractors define and implement adequate security with regard to personal data we share with them. |
| <p>Transfer of data to third countries</p> | <p>Currently, our data is kept within locations in EU countries. If the transfer of Users/Customers data to ESWD units / subcontractors / partners in non-EES countries is necessary (<i>the EES countries being the UE countries, plus Switzerland, Iceland, Liechtenstein and Norway – considered to have equivalent laws with respect to privacy law</i>), in situations where the place for storing our data or the location of our ESWD units / subcontractors / partners is outside SEE, we will always ensure that a proper legal contract covering such transfer is in place, in accordance with the standards adopted by the European Commission to this end. Nevertheless, should such a third party not have laws equivalent to the UE data protection standards, we shall ask such third party recipient to enter into a binding agreement reflecting these standards.</p> |
| <p>Data subject's rights</p> | <p>In order to make sure that each User/Customer is in control of their personal data, we ensure that each data subject can do the following:</p> <ul style="list-style-type: none"> ▪ They may operate their Account and amend / delete / edit data; ▪ They may delete cookies from their browser; ▪ The social media platforms offer mechanisms where the User/Customer may choose their options regarding sharing data with other sites. |

Also, in your capacity as data subject, according to Regulation EU 2016/679, Users/Customers enjoy the rights detailed below (Users/Customers may be asked to prove their identity and quality as Account holder, in order for their requests be analysed). We try to answer requests without delay and no later than 30 days after the request being made (or in another reasonable term, as per the Regulation).

Right to be informed. The User has the right to receive clear, transparent, easy to understand and access, information, with respect to the manner in which we process their personal data, including details about their rights as data subject. This information is presented in this Privacy Policy.

Right to access their personal data. The User/Customer is entitled to access their data we process about them; we will not charge for initial requests. If the User/Customer requests copies of the data already provided, we may charge a reasonable fee, to reflect the administrative costs associated with the provision of such data. We reserve the right to refuse excessive and/or repeated requests.

The request for access right must be sent by the User/Customer at:

- E-mail: UK@eshopwedrop.com

Right to rectification. The User/Customer who identifies that the data we process about them is incorrect, incomplete or inaccurate, may:

- Send us a request for rectification at e-mail UK@eshopwedrop.com

Right to object to direct marketing. The User/Customer may object at any time and un-scribe from our direct marketing materials. They may do this only by clicking the "un-scribe me" link provided in each such communication we sent to them.

Withdrawal of consent (un-scribing or written request) does not affect the legality of the processing based on consent before the withdrawal.

Right to object based on legitimate interest. The User/Customer may oppose at any time to any processing which is stated to be based on our legitimate interest. Under the section "Legal grounds" the table, you can easily see when we process personal data based on our legitimate interest. The User/Customer may exercise their right to object by sending a written request to UK@eshopwedrop.com.

Right to erasure (right to be forgotten). The User/Customer is entitled to request the deletion of their rights in any of the following situations: (a) personal data is no longer necessary for accomplishing the purposes for which it has been processed, (b) User/Customer withdraws consent where processing has been based on consent, and we do not have other legal ground for continuing the processing, (c) the User/Customer objects to

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| | <p>processing for direct marketing (including to profiling for direct marketing, if applicable), (d) the User/Customer objects to processing based on our legitimate interest and we cannot show a reason why our legitimate interest prevails over their interests, rights and freedoms, (f) personal data is processed contrary to the law; (g) personal data must be deleted in order to comply with legal requirements.</p> <p>Right to erasure is not an absolute right. We may deny the request if (i) we are obliged by law to keep the data; or (ii) the data is necessary for attesting, exercising or protecting our rights in a court of law.</p> <p>The User/Customer may request deletion of data by sending their request by e-mail at UK@eshopwedrop.com.</p> <p>Right to ask for restriction of processing. The User has the right to obtain from us the restriction of processing in any of the situations below:</p> <p>(a) when the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;</p> <p>(b) when the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;</p> <p>(c) when we no longer need the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims;</p> <p>(d) when the data subject has objected to processing based on our legitimate interest, pending the determination whether the legitimate grounds of the controller override those of the data subject (User/Customer).</p> <p>The User/Customer may exercise their right by sending their request by e-mail at UK@eshopwedrop.com.</p> <p>Right to data portability. When we process a User's/Customer's personal data based on their consent or under a contract, the respective User/Customer is entitled to request the transfer of their personal data: (a) to the User/Customer or (ii) to another controller chosen by the respective User. The User may request the transfer only of the personal data the User/Customer themselves provided to us directly and actively (except for any data that we generated or created/determined).</p> <p>The User/Customer may exercise their right by sending their request by e-mail at UK@eshopwedrop.com.</p> |
| <p>FAQ</p> | <p>We will answer any request for information with regard to this Privacy Policy. You may contact us as follows:</p> <ul style="list-style-type: none"> - by e-mail, at: UK@eshopwedrop.com |

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| | <ul style="list-style-type: none"> - by phone, at the telephone numbers published on the website <p>Access, erasure, rectification or portability shall not affect data of other parties.</p> |
| <p>Complaint to National Data Protection Authority</p> | <p>If you consider yourself harmed by the processing of your data as per the terms herein, you may write to Information Commissioner's Office: www.ico.org.uk.</p> <p>We trust that you will choose to contact us first, in order reach an amicable settlement, at email: UK@eshopwedrop.com.</p> |
| <p>Updates to our Privacy Policy</p> | <p>This Privacy Policy is available on the Website. You may also request a copy by e-mail at: UK@eshopwedrop.com. The Cookies Policy shall also apply.</p> |
| <p>Version</p> | <p>Version applicable from 9th May 2024.</p> |