

## **PRIVACY POLICY**

### **WHAT THIS POLICY COVERS**

Your privacy is important to us, and so is being transparent about how we collect, use and share information about you. This policy is intended to help you understand the following:

- What information we collect about you
- How we use the information we collect
- How we share the information we collect
- How we store and secure the information we collect
- How to access and control your information
- How we transfer the information we collect internationally
- Other important privacy information

We refer to all our online services and the possibility to order goods from us as “Services” in this policy.

This privacy policy covers the information we collect about you when you use our products or services, or otherwise interact with us, unless a different policy is displayed.

This policy also explains your rights about how the information we hold on you is used. Your rights include how you can object to certain uses of information about you and how you can access and update certain information about you.

### **WHAT INFORMATION WE COLLECT ON YOU**

#### **OVERVIEW**

We collect information about you when:

- You provide it to us.
- Automatically when you use the Services.

The information we collect includes account and contact information, device and connection information, Service information and logs.

#### **INFORMATION YOU PROVIDE TO US**

We collect information about you when you input it into the Services or otherwise provide it directly to us.

##### ***Account and Profile Information:***

We collect information about you when you do one or more of the following on our online store:

- Register for an account
- Modify your account

- Make a purchase

The personal information we collect is the following:

- Name
- Email
- Billing Address
- Delivery Address
- Telephone Number

### ***Content you provide through our websites***

We collect any content you submit to the websites owned and operated by us. The personal information we collect on these websites are:

- Name
- Email Address

### ***Device and Connection Information***

We collect information about your computer, phone, tablet or other devices you use to access the Services, which is anonymised and aggregated. The device information includes:

- Operating system
- Browser type
- URLs or referring/exit pages

### ***Cookies and Other Tracking Technologies***

iPon, use cookies to provide functionality and to recognise you across different Services and devices.

## **INFORMATION FROM THIRD PARTIES**

We receive information about you from third-party services when you interact with certain Services or information made public by other third-party services.

### ***Other services you link to your account***

We receive information about you when you link your account with a third party account. The information we collect this way is

- Third-party user id

For example, when you link your Google or Facebook account to a iPon account, we receive your specific ID.

The information we receive when you link our Services with a third-party service depends on the settings, permissions and privacy policy controlled by that third-party service. You should always check the privacy settings and notices in these third-party services to understand what data may be disclosed to us or shared with our Services.

### ***Information made public by third parties***

We receive information about you from information made public by third-parties via a website and/or API. The information we collect this way is

- Third-party user id
- Posts

- Reviews

## **HOW WE USE THE INFORMATION WE COLLECT**

How we use the information we collect depends, in part, on the Services you use, how you use them and any preferences you have communicated to us. These uses include providing, securing and improving the Services, communicating with you about the Services, support for the Services, and with your consent, additional marketing about the Services.

### ***To provide the Services***

We use the information about you to provide the Services to you, including:

- Process transactions
- Authenticate you when you log in
- Provide customer support
- Operate and maintain the Services

For example, the username you provide is used to identify you to other Service users.

### ***To communicate with you about the Services***

We use your contact information to send transactional communications via email for the following:

- Confirming your purchases
- Responding to questions and requests
- Providing customer support

These communications are part of the Services and, in most cases, you cannot opt out of them. If an opt out is available, you will find the option within the communication itself or in your account settings.

### ***To market, promote and/or drive engagement with the Services***

We use your contact information and information about how you use the Services to send you promotional communications that may be of specific interest to you by doing the following:

- Sending you an email
- Display ads on our site

These communications are aimed at driving engagement and maximizing what you get out of the Services, including:

- Information about new Services
- Survey requests
- Newsletters

We also communicate with you about new product offers, promotions and contests. You can control whether you receive these communications as described in your account settings on the iPon online store.

### ***Community Promotions and Prizes***

We use your information to:

- Send and deliver prizes to you
- Notify you of the outcome of community promotions

### ***Customer support***

We use your information to:

- Resolve issues you encounter
- Respond to your requests for assistance
- To analyse website or order related bugs

### ***For safety and security***

We use information about you and your Service use to:

- Verify accounts and activity
- Monitor suspicious or fraudulent activity
- Identify violations of Service policies

### ***To protect our legitimate business interests and legal rights***

Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

## **LAWFUL BASES FOR PROCESSING**

As we are a company that operates within the European Economic Area (EEA), we collect and process information about you only where we have a legal basis for doing so under applicable laws. The lawful basis depends on the Services you use and how you use them. This means we collect and use your information only where:

- We need it in order to provide you the Services, including to operate the Services, provide customer support and personalised features and to protect the safety and security of the Services.
- You give us consent to do so for a specific purpose.
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

### **Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights**

In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and services, (d) protect iPon Computer Kft, our customers, or the public from harm or illegal activities,

or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

## **HOW WE STORE AND SECURE THE INFORMATION WE COLLECT**

### **INFORMATION STORAGE AND SECURITY**

We use data hosting service providers in the European Union to host the information we collect, and we use technical measures to secure your data.

Although we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our system or otherwise in our care, is absolutely safe from intrusion by others.

Any data that we collect via our Services is transferred over an SSL protocol for security during transmission.

Access to the data is limited to trusted employees.

### **HOW LONG WE KEEP INFORMATION**

How long we keep information we collect depends on the type of information, as described below. After such time, we will either delete or anonymise your information or, if this is not possible (for example, the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

#### ***Account Information***

We retain your account information for as long as your account is open. Due to the nature of our Services, if you stop using our Services and do not tell us, your information will remain in case you decide to start using our Services again.

If at any point our Services stop, we will delete all the information we hold relating to the Service that has stopped.

We also retain some of your information that is necessary:

- To comply with our legal obligations
- To resolve disputes
- To enforce our agreements
- To support business operations
- To continue to develop and improve our Services.

Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Services.

## **HOW TO ACCESS AND CONTROL YOUR INFORMATION**

You have certain rights available to you when it comes to your information. Below is a summary of those rights, how to exercise them and any limitations.

## **YOUR RIGHTS**

Below is a list of your rights:

- Request a copy of your information
- Object to our use of your information (including for marketing purposes)
- Withdraw previously given consent
- Request the deletion or restriction of your information
- Request your information in a structured, electronic format
- Right to complain to a relevant supervisory authority

Below, we describe the tools and processes for making these requests. You can exercise some of these rights by logging into the Services and using settings available within the Service or your account.

Your request and rights may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information we are permitted to by law or have a compelling legitimate interest to keep. If you have unresolved concerns, you have the right to complain to a supervisory authority in the country where you live, where you work or where you feel your rights were infringed.

### ***Request a copy of your information***

You have the right to request any of the personal information we hold on you. You can do this by sending an email to [info@iponcomp.com](mailto:info@iponcomp.com) and ask for your information.

We will provide this information to you as soon as possible from the point we have all the information to process the request.

This information will be sent to you in a computer readable format, unless another reasonable format is requested.

### ***Access and update your information***

Our Services give you the ability to access and update certain information about you from within the account settings in the Services. You can also opt out of certain communications in your account settings on iPon's online store.

### ***Delete your account***

If you no longer wish to use our Services, you can delete your account from your profile.

If you delete your account, you will permanently lose access to our Services, including, any purchases made

Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

### ***Request that we stop using your personal data***

In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe a Service account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy. Where you gave

us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place before that time. When you make such requests, we may need time to investigate and facilitate your request. If there is delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honoured or the dispute is resolved.

### ***Opt out of communications***

You may opt out of receiving promotional communications from us by using the unsubscribe link within each email, updating your email preferences within your account settings menu, or by contacting customer support to have your contact information removed from our promotional email list or registration database. Even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages from us regarding our Services.

### ***Turn off Cookie Controls***

To opt-out of our use of cookies, you can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from websites you visit. If you do not accept cookies, however, you may not be able to use all aspects of our Services.

Many browsers include their own management tools for removing HTML5 local storage objects. You will not be able to opt-out of any cookies or other technologies that are “strictly necessary” for the Services.

## **CHANGES TO OUR PRIVACY POLICY**

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice on our site, or by sending you an email notification.