

# Privacy policy

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Effective March 21, 2019

Mindrove Kft. collects customer information in an effort to improve our customers' shopping experiences and to communicate with our customers about our products, services and promotions.

We value the privacy and security of our customers. We NEVER sell, rent, or disclose your information to a third-party without your express permission, and then only for the purposes of customer service related to order processing and payment, as required by law.

## 1. WHO ARE WE?

"Mindrove", "we" or "us" refers to Mindrove Kft., a company incorporated in Budapest, Hungary. You can contact us via email at [info@mindrove.com](mailto:info@mindrove.com) for any questions relating to our Privacy Policy.

## 2. WHAT DOES THIS PRIVACY POLICY GOVERN?

This Privacy Policy is where we explain what information is being collected when you use the Mindrove website and products (our "Services"), and how that information is collected, utilized, stored and protected. This policy also explains your rights relating to the collection and use of your personal information ("Personal Information" means information which, on its own or in combination with other information, can be used to identify you). Mindrove respects the privacy of its online visitors and customers of its products and services and complies with applicable laws for the protection of your privacy in the USA and elsewhere.

Under European Union data protection legislation, Mindrove is the "data controller" for personal information collected from our Services. Mindrove doesn't work with "Partners" and Third Parties (Google, Facebook, Shopify).

Please read the following carefully to get a clear understanding of how we collect, use, protect or otherwise handle any Personal Information collected from the use of our Services.

## 3. WHAT CONSTITUTES ACCEPTANCE OF THIS POLICY?

By clicking "I accept" on any Privacy Policy prompts, or by continuing to use the Mindrove website and Services beyond reviewing this Privacy Policy, you are consenting to the use of your personal information as described in this Policy.

## 4. WHAT PERSONAL INFORMATION DO WE COLLECT?

The Personal Information that Mindrove collects varies depending on your use of our Services.

When you use Mindrove services we may collect the following information (how we use it is described later in this document):

I. Contact Information: Name, Address, Phone Number, Email and other basic information submitted when making a purchase, contacting us.

- II. Limited financial information: information you provide to us when making purchases from Mindrove including credit card number, expiration date, verification code, or similar information from other connected payment services (Paypal).
- III. User Content: any information you include in posts or content shared while using our Services.
- IV. Support query information: any other personal information, or technical information provided in order to help you during any customer support communications.
- V. Any other information which you voluntarily submit to us during the use of our Services.

## 5. HOW DO WE COLLECT INFORMATION?

We collect Personal Information when a user:

- I. Makes a purchase
- II. Accesses our Services
- III. Uploads or shares User Content either on our site or through connected social media platforms
- IV. Communicates with us via e-mail
- V. Completes surveys or other optional forms from our communications with users
- VI. Through “Cookies” (You can find out more about this in our “Cookie Policy”. The Cookie Policy forms part of this Privacy Policy.)

When submitting to Mindrove any information about a third party, such as a friend, research subject, partner, or employee, you represent and warrant to Mindrove that you have obtained the informed consent of that third party to provide this information to Mindrove for use as outlined in this Policy.

## 6. LEGAL GROUNDS FOR DATA PROCESSING

Data protection law in Europe requires a “lawful basis” for collecting and retaining personal information from citizens or residents of the European Economic Area. Our lawful bases include:

- I. Contractual obligation: In certain circumstances, we need personal data to complete our end of any contract/agreement with you, such as collecting payment information and address to complete your order.
- II. Legal compliance: Sometimes the law says we need to collect and use your data. For example, tax laws require us to retain records of pledges and payments made through our Services.
- III. Legitimate interests: This is a technical term in data protection law which essentially means we have a good and fair reason to use your data and we do so in ways which do not hurt your interests and rights. When we process your personal information for our legitimate interests, we make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate business interests do not automatically override your interests. We will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

For other purposes we will ask for your consent and you will be entitled to withdraw this consent any time, with no impact on the validity of the processing before your consent has been withdrawn.

## 7. HOW DO WE USE YOUR INFORMATION?

We use the Personal Information that we collect to operate, improve, and personalize the Website and services including to provide customer service, customize our marketing, to detect, prevent and mitigate fraudulent or illegal activities. You agree that we may use your Personal Data as follows:

- I. to provide the Services to you;
- II. to improve and personalize the services we offer;
- III. to allow us to better respond to your customer service requests;
- IV. to communicate with you, either via email, telephone, or otherwise as authorized by you to inform you about our Services,
- V. to better understand how users access and use the website and services, for the purposes of trying to improve the Website
- VI. to help us develop new products and improve our existing Services;
- VII. to provide users with more relevant marketing and promotional material;
- VIII. to assess the effectiveness of and improve advertising and other marketing and promotional activities on or in connection with the Services.
- IX. for any other purpose with your consent.

By continuing to use the Mindrove services, you are consenting to our use of your Personal Information for the above reasons.

## 8. DISCLOSURE OF INFORMATION

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- I. To fulfill the purpose for which you provide it.
- II. For any other purpose disclosed by us when you provide the information.
- III. With your consent.
- IV. For legal purposes: We also may share information that we collect from users, as needed, to enforce our rights, protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We will disclose Personal Data as we deem necessary to respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process. We may also share Personal Information as required to pursue available remedies or limit damages we may sustain.

## 9. HOW DO WE STORE AND PROTECT YOUR INFORMATION?

All sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

We get your personal data via e-mail. In particular, we don't keep any personal data we don't need, and we store and use it securely.

## 10. HOW LONG DO WE KEEP YOUR DATA?

We will retain your personal information only for as long as we will be required in order to fulfil the purposes outlined in this Privacy Policy. In certain special cases, longer retention period might be required by law for tax, accounting purposes or other legal requirements and

obligations. As soon as we no longer require your personal data to provide our services for other purposes mentioned above, we will promptly delete it.

## 11. YOUR PRIVACY RIGHTS & OPTING OUT

You have the right to object to the processing of your personal information in certain situations and can opt out by contacting us, or by unsubscribing from any marketing emails sent to you.

Depending on where you live, you may have additional privacy rights. Under EU laws, you have the following additional rights:

I. The right to be informed; This means anyone processing your personal data must make clear what they are processing, why, and who else the data may be passed to.

II. The right of access; this is your right to see what data is held about you by a Data Controller.

III. The right to rectification; the right to have your data corrected or amended if what is held is incorrect in some way.

IV. The right to erasure; under certain circumstances you can ask for your personal data to be deleted. This is also called 'the Right to be Forgotten'. This would apply if the personal data is no longer required for the purposes it was collected for, or your consent for the processing of that data has been withdrawn, or the personal data has been unlawfully processed.

V. The right to restrict processing; this gives the Data Subject the right to ask for a temporary halt to processing of personal data, such as in the case where a dispute or legal case has to be concluded, or the data is being corrected.

VI. The right to data portability; a Data Subject has the right to ask for any data supplied directly to the Data Controller by him or her, to be provided in a structured, commonly used, and machine-readable format.

VII. The right to object; the Data Subject has the right to object to further processing of their data which is inconsistent with the primary purpose for which it was collected, including profiling, automation, and direct marketing.

VIII. Rights in relation to automated decision making and profiling; Data Subjects have the right not to be subject to a decision based solely on automated processing.

California residents have additional rights pursuant to Section 1798.83 of the California Civil Code. This law states that companies must inform consumers about the types of Personal Information that have been shared with third parties, who those third parties are, and examples of the types of services or products marketed by those third parties. To request a copy of the information disclosure [info@mindrove.com](mailto:info@mindrove.com)

## 12. PROTECTING CHILDREN

We do not and will not knowingly collect personal information from any child under the age of 16. If we learn that any user of the Services is under the age of 16, we will take necessary steps to remove information about that user from all systems. If you are a parent or guardian of a child under 16 who you believe has used our Services, please contact [info@mindrove.com](mailto:info@mindrove.com)

## 13. CONTACT INFO

If you have any concerns or questions about how Mindrove handles your personal information, please contact us first.

## 14. CHANGES TO THIS POLICY

Our Privacy Statement applies to all users worldwide. Mindrove reserves the right to make changes to this Policy at any time. In the event we do change our Policy you will find the updated version on our website, and users will be emailed to notify them of changes. You can find the current version on our website.

