

# Privacy policy

The following Privacy Policy sets out **rules for saving and accessing data on Users' Devices** using the Website for the purpose of providing electronic services by the Administrator and **rules for collecting and processing Users' personal data**, which were provided by them personally and voluntarily through the tools available on the Website.

## §1 Definitions

- **Website** - website "Avosun.ee" operating at <https://avosun.ee>
- **External website** - websites of partners, service providers or recipients cooperating with the Administrator
- **Website / Data Administrator** - The Website Administrator and the Data Administrator (hereinafter the Administrator) is the company "Avomet Trade OÜ", operating at the address: Roosikrantsi 2--K056, 10119 Tallinn, Registration code: 14009683, with the VAT ID: EE101862244, providing electronic services via the Website
- **User** - a natural person for whom the Administrator provides services electronically via the Website.
- **Device** - an electronic device with software through which the User gains access to the Website
- **Cookies** - text data collected in the form of files placed on the User's Device
- **GDPR** - Regulation of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repeal of the directive 95/46 / EC (General Data Protection Regulation)
- **Personal data** - information about an identified or identifiable natural person ("data subject"); an identifiable natural person is a person who can be directly or indirectly identified, in particular on the basis of an identifier such as name and surname, identification number, location data, internet identifier or one or more specific physical, physiological, genetic, mental factors, the economic, cultural or social identity of the natural person
- **Processing** - means an operation or a set of operations performed on personal data or sets of personal data in an automated or non-automated manner, such as collecting, recording, organizing, organizing, storing, adapting or modifying, downloading, viewing, use, disclosure by sending, distributing or otherwise sharing, adjusting or combining, limiting, deleting or destroying;
- **Restriction of processing** - means the marking of stored personal data in order to limit their processing in the future
- **Profiling** - means any form of automated processing of personal data, which consists in the use of personal data to evaluate certain personal factors of a natural person, in particular to analyze or forecast aspects related to the effects of work of that natural person, his situation economy, health, personal preferences, interests, reliability, behavior, location or movement
- **Consent** - the consent of the data subject means a voluntary, specific, informed and unambiguous demonstration of the will to which the data subject, in the form of a declaration or a clear affirmative action, allows the processing of data concerning him personal
- **Breach of personal data protection** - a security breach leading to accidental or unlawful destruction, loss, modification, unauthorized disclosure or unauthorized access to personal data transmitted, stored or otherwise processed

- **Pseudonymization** - means the processing of personal data in such a way that they can no longer be assigned to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures that prevent their being attributed to an identified or identifiable natural person
- **Anonymization** - Data anonymization is an irreversible process of data operations that destroys / overwrites "personal data" making it impossible to identify or associate a given record with a specific user or natural person.

## §2 Data Protection Officer

Pursuant to Art. 37 of the GDPR, the Administrator has not appointed a Data Protection Officer. In matters relating to the processing of data, including personal data, please contact the Administrator directly.

## §3 Types of Cookies

- **Internal cookies** - files uploaded and read from the User's Device by the Website's ICT system
- **External cookies** - files placed and read from the User's Device by the ICT systems of external websites. Scripts of external websites that may place cookies on User's Devices have been consciously placed on the Website through scripts and services made available and installed on the Website
- **Session cookies** - files uploaded and read from the User's Device by the Website during one session of a given Device . After the session ends, the files are removed from the User's Device.
- **Persistent cookies** - files placed and read from the User's Device by the Website until they are manually deleted . Files are not deleted automatically after the end of the Device session, unless the User's Device configuration is set to the Cookie deletion mode after the end of the Device session.

## §4 Data storage security

- **Mechanisms for storing and reading Cookie files** - Mechanisms for storing, reading and exchanging data between Cookies saved on the User's Device and the Website are implemented through the built-in mechanisms of web browsers and do not allow downloading other data from the User's Device or data of other websites visited by the User, including personal data and confidential information. It is also practically impossible to transfer viruses, Trojans and other worms to the User's Device.
- **Internal cookies** - Cookie files used by the Administrator are safe for Users' Devices and do not contain scripts, content or information that may threaten the security of personal data or the security of the Device used by the User.
- **External cookie** - The Administrator takes all possible actions to verify and select website partners in the context of Users' safety. The administrator selects well-known, large partners with global social trust for cooperation. However, it does not have full control over the content of cookies from external partners. The Administrator is not responsible for the security of Cookie files, their content and the use in accordance with the license by the Scripts installed on the website from

external websites, as far as the law allows. The list of partners is provided further in the Privacy Policy.

- **Cookie control**
  - The user may at any time independently change the settings for saving, deleting and accessing the data of saved cookies by each website
  - Information on how to disable cookies in the most popular computer browsers is available at one of the following providers:
    - [Managing cookies in the browser Chrome](#)
    - [Managing cookies in the browser Opera](#)
    - [Managing cookies in the browser FireFox](#)
    - [Managing cookies in the browser Edge](#)
    - [Managing cookies in the browser Safari](#)
    - [Managing cookies in your browser Internet Explorer 11](#)
  - The User may at any time delete any Cookie files saved so far using the User's Device tools through which the User uses the Website's services.
- **Threats on the part of the User** - The Administrator uses all possible technical measures to ensure the security of data placed in Cookie files. However, it should be noted that ensuring the security of this data depends on both parties, including the User's activity. The Administrator is not responsible for intercepting this data, impersonating the User's session or removing them as a result of the User's conscious or unconscious activity, viruses, Trojan horses and other spyware that may or may have been infected with the User's Device.
- **Storage of personal data** - the Administrator ensures that he makes every effort to ensure that the processed personal data entered voluntarily by Users is safe, access to them is limited and carried out in accordance with their intended purpose and processing purposes. The administrator also ensures that he makes every effort to protect his data against loss, by using appropriate physical and organizational safeguards.

## §5 Purposes for which cookies are used

- Improving and facilitating access to the Website
- Personalization of the Website for Users
- Ad serving services
- Keeping statistics (users, number of visits, types of devices, link, etc.)
- Provision of community services

## §6 Purposes of personal data processing

Personal data voluntarily provided by Users are processed for one of the following purposes:

- The User may at any time delete any Cookie files saved so far using the User's Device tools through which the User uses the Website's services.
- **Threats on the part of the User** - The Administrator uses all possible technical measures to ensure the security of data placed in Cookie files. However, it should be noted that ensuring the security of this data depends on both parties, including the User's activity. The Administrator is not responsible for intercepting this data, impersonating the User's session or removing them as a result of the User's conscious or unconscious activity, viruses, Trojan horses and other spyware that may or may have been infected with the User's Device.

- **Storage of personal data** - the Administrator ensures that he makes every effort to ensure that the processed personal data entered voluntarily by Users is safe, access to them is limited and carried out in accordance with their intended purpose and processing purposes. The administrator also ensures that he makes every effort to protect his data against loss, by using appropriate physical and organizational safeguards.

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## §6 Purposes of personal data processing

Personal data voluntarily provided by Users are processed for one of the following purposes:

- Provision of electronic services:
- Communication of the Administrator with Users on matters related to the Website and data protection
- Ensuring the Administrator's legitimate interest

Data about Users collected anonymously and automatically are processed for one of the following purposes:

- Keeping statistics
- Serving advertisements tailored to Users' preferences
- Ensuring the Administrator's legitimate interest

## §7 Cookies of external websites

The Administrator on the Website uses javascript scripts and web components of partners who may place their own cookies on the User's Device. Remember that in your browser settings you can decide for yourself about the allowed cookies that can be used by individual websites. Below is a list of partners or their services implemented on the Website that may place cookies:

- **Social / Combine services:** (Registration, Login, content sharing, communication, etc.)
  - [Facebook](#)
- **Ad serving services and affiliate networks:**
  - [Google Adsense](#)
- **Keeping statistics:**
  - [Google Analytics](#)

Services provided by third parties are beyond the Controller's control. These entities may at any time change their terms of service, privacy policy, the purpose of data processing and the methods of using cookies.

## §8 Types of collected data

The website collects data about Users. Some data is collected automatically and anonymously, and some data is personal data provided voluntarily by Users when subscribing to individual services offered by the Website. **Anonymous data collected automatically:**

- IP address
- Browser type
- Screen resolution
- Approximate location
- Subpages of the site opened
- Time spent on the relevant subpage of the website
- Type of operating system
- Address of the previous subpage
- Referrer address
- Browser language
- Internet connection speed
- Internet Service Provider
- Demographics (age, gender)

### **Data collected during registration:**

- Name / surname / nickname
- E-mail address
- IP address (collected automatically)

### **Data collected when subscribing to the Newsletter service**

- Name / surname / nickname
- E-mail address
- IP address (collected automatically)

Part of the data (without identifying data) may be stored in cookies. Some data (without identifying data) may be transferred to the statistical service provider.

## §9 Access to personal data by third parties

As a rule, the only recipient of personal data provided by Users is the Administrator. Data collected as part of the services provided are not transferred or sold to third parties. Access to data (most often on the basis of the Data Processing Agreement) may be granted to entities responsible for maintaining the infrastructure and services necessary to run the website, i.e. :

- Hosting companies that provide hosting or related services to the Administrator

**Entrusting the processing of personal data - Hosting Services, VPS or Dedicated Servers** In order to run the website, the Administrator uses the services of an external hosting provider, VPS or Dedicated Servers - **Dhosting sp. z o.o.** . All data collected and processed on the website is stored and processed in the service provider's infrastructure located in Poland. It is possible to access data as a result of service work carried out by the service provider's staff. Access to this data is governed by the contract concluded between the Administrator and the Service Provider. & nbsp;

## **§10 Personal data processing method**

**Personal data provided voluntarily by Users:**

- Personal data will not be transferred outside the European Union, unless it has been published as a result of an individual action of the User (e.g. entering a comment or entry), which will make the data available to every visitor to the website.
- Personal data will not be used for automated decision making (profiling).
- Personal data will not be sold to third parties.

**Anonymous data (no personal data) collected automatically:**

- Anonymous data (no personal data) will be transferred outside the European Union.
- Anonymous data (without personal data) may be used for automated decision making (profiling). Profiling anonymous data (without personal data) has no legal effects or similarly does not significantly affect the person whose data is subject to automatic decision making.
- Anonymous data (without personal data) will not be sold to third parties.

## **§11 Legal basis for the processing of personal data**

The website collects and processes Users' data on the basis of:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46 / EC (general regulation on data protection)
  - art. 6 sec. 1 lit. a and the data subject has consented to the processing of his personal data for one or more specific purposes
  - art. 6 sec. 1 lit. b processing is necessary for the 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
  - art. 6 sec. 1 lit. f processing is necessary for the purposes of the legitimate interests pursued by the administrator or by a third party
- Act of 10 May 2018 on the protection of personal data (Journal of Laws 2018, item 1000)
- Act of 16 July 2004 Telecommunications Law (Journal of Laws of 2004, No. 171, item 1800).
- Act of February 4, 1994 on copyright and related rights (Journal of Laws of 1994 No. 24, item 83)

## §12 Period of personal data processing

**Personal data provided voluntarily by Users:** As a rule, the indicated personal data is stored only for the period of the provision of the Service by the Administrator. They are deleted or anonymized within 30 days from the end of the provision of services (e.g. deletion of a registered user account, unsubscribing from the Newsletter list, etc.) The exception is the situation that requires securing the legitimate purposes of further processing of this data by the Administrator. In such a situation, the Administrator will store the indicated data, from the time of requesting their removal by the User, no longer than for a period of 3 years in the event of a breach or suspected breach of the provisions of the website regulations by the User

**Anonymous data (without personal data) collected automatically:** As a rule, the indicated personal data is stored only for the period of providing the Service on the Website by the Administrator. They are deleted or anonymized within 30 days from the end of the provision of services (e.g. deletion of a registered user account, unsubscribing from the Newsletter list, etc.) The exception is the situation that requires securing the legitimate purposes of further processing of this data by the Administrator. In such a situation, the Administrator will store the indicated data, from the time of requesting their removal by the User, no longer than for a period of 3 years in the event of a breach or suspected breach of the provisions of the website regulations by the User

**Anonymous data (no personal data) collected automatically:** Anonymous statistical data, not constituting personal data, are stored by the Administrator in order to keep website statistics for an indefinite period

## §13 Users' rights related to the processing of personal data

The website collects and processes Users' data on the basis of:

- **Right to access personal data** Users have the right to access their personal data upon request submitted to the Administrator
- **Right to rectify personal data** Users have the right to request the Administrator to immediately correct personal data that is incorrect and / or supplement incomplete personal data, carried out at the request submitted to the Administrator
- **Right to erasure of personal data** Users have the right to request the Administrator to immediately delete personal data, carried out at the request submitted to the Administrator. The Administrator reserves the right to suspend the execution of the request to delete data in order to protect the legitimate interest of the Administrator (e.g. when the User has violated the Regulations or the data was obtained as a result of correspondence). In the case of the Newsletter service, the User has the option of removing their personal data by themselves using the link provided in each sent e-mail.
- **The right to limit the processing of personal data** Users have the right to limit the processing of personal data in the cases specified in art. 18 GDPR, incl. questioning the correctness of personal data, carried out at the request submitted to the Administrator
- **Right to data portability** Users have the right to obtain from the Administrator personal data regarding the User in a structured, commonly used machine-readable format, implemented at the request submitted to the Administrator

- **The right to object to the processing of personal data** Users have the right to object to the processing of their personal data in the cases specified in art. 21 of the GDPR, implemented at the request submitted to the Administrator
- **Right to lodge a complaint** Users have the right to lodge a complaint with the supervisory body dealing with the protection of personal data.

## §14 Contact to the Administrator

You can contact the Administrator in one of the following ways

- **Postal address** - Avomet Trade OÜ, Roosikrantsi 2--K056 10119 Tallinn
  - **E-mail address** - office@avomet.ee
  - **Phone call** - +372 668 25 01
  - **Contact form** - available at: / contact-us

## §15 Service Requirements

- Restricting the saving and access to Cookie files on the User's Device may cause some functions of the Website to malfunction.
- The Administrator does not bear any responsibility for incorrectly functioning Website functions if the User restricts in any way the possibility of saving and reading cookie files.

## §16 External Links

On the Website - articles, posts, posts or comments of Users, there may be links to external websites with which the Website Owner does not cooperate. These links and the pages or files indicated under them may be dangerous to your Device or pose a threat to the security of your data. The Administrator is not responsible for the content outside the Website.

## §17 Changes to the Privacy Policy

- The Administrator reserves the right to change this Privacy Policy at any time without informing Users about it in terms of the application and use of anonymous data or the use of cookies.
- The Administrator reserves the right to change this Privacy Policy in any way regarding the processing of Personal Data, about which he will inform Users who have user accounts or subscribed to the newsletter service via e-mail within 7 days of changing the records. By continuing to use the services, you have read and accepted the changes to the Privacy Policy. In the event that the User does not agree with the introduced changes, he is obliged to delete his account from the Website or unsubscribe from the Newsletter service.
- The changes made to the Privacy Policy will be published on this subpage of the Website.
- Introduced changes shall become effective upon their publication.