

## **Privacy Notice**

AQUA Carpatica ("We") are committed to protecting and respecting your privacy. This Notice (together with our terms and conditions and any other documents referred to) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

- 1. We are the Controller in respect of your personal data.
- 1.1 Our full name: Carpathian Springs SA (company number J33/358/2000)
- 1.2 Our contact details:

Address: 33 Republicii St, Vatra Dornei, Suceava, 725700, Romania

Telephone number: +40 0212111415

E-mail address: info@aquacarpatica.co.uk

- 2. We will use personal data we collect when you subscribe to receive our marketing communications to:
- 2.1 send you marketing communications (where you have asked us to) which may be tailored to your "profile" based on the personal data we know or learn about you and your preferences;
- 2.2 show you marketing communications on other websites, including social media platforms;
- 2.3 keep an-up-to-date suppression list if you have asked not to be contacted; and
- 2.4 run analytics and/or collect statistics.
- 3. We will use personal data we collect when you submit content (for example images or ratings and reviews) on one of our websites, apps, or social media platforms, or accept our re-use of any content you posted on social media platforms, to:
  - 3.1.1 use the content you have created and/or shared in accordance with the specific terms and conditions accepted by you (for example, to post your review/content and to promote our products); and
  - 3.1.2 run analytics and statistics.
- 3.2 We will use personal data we collect as part of your use of our apps and/or devices to:
  - 3.2.1 monitor and improve our apps and devices; and
  - 3.2.2 run analytics and statistics.



- 3.3 We will use cookies we collect, together with other personal data, to:
  - 3.3.1 deliver target advising to show you online advertisements for products which may be of interest to you based on your previous behaviour, and advertisements and content on social media platforms or other websites.
  - 3.3.2 allow our website and apps to function properly by:
    - (a) ensuring the proper display of content;
    - (b) creating and remembering your shopping cart;
    - (c) creating and remembering your account log-in details;
    - (d) interfacing personalisation, such as language, or any user-interface customisation; and
    - (e) improving our websites and apps.
  - 3.3.3 ensure our websites and apps are secure and safe, and to protect you against fraud or misuse of our websites and apps or services;
  - 3.3.4 run statistics to avoid visitors being recorded twice, know users' reaction to our advertising campaigns, improve our offers, and understand how you discovered our website and apps; and
  - 3.3.5 allow sharing of our content on social media.
- 4. The legal bases for processing your personal data are that:
- 4.1 processing is necessary for the performance of a contract to which you are a party;
- 4.2 processing is necessary for compliance with a legal obligation to which we are subject; and
- 4.3 processing is necessary for the purposes of the legitimate interests pursued by us.
- 5. The legitimate interests referred to at paragraph 4.3 above are:
- 5.1 processing for direct marketing purposes;
- 5.2 processing for the purposes of preventing fraud; and
- 5.3 processing for the purposes of ensuring network and information security, including preventing unauthorised access to electronic communications networks and malicious code distribution and stopping 'denial of service' attacks and damage to computer and electronic communication systems.
- 6. The recipients or categories of recipients of your personal data are:



- 6.1 business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- 6.2 third parties that assist and help us in providing digital and e-commerce services such as social listening, store locator, loyalty programmes, identity management, ratings and reviews, CRM, web analytics and search engine, and user generated content curation tools;
- 6.3 advertising, marketing, digital and social media agencies to help us to deliver advertising, marketing, and campaigns, to analyse their effectiveness, and to manage your contact and questions;
- 6.4 the prospective seller or buyer of any business or assets in the event that we sell or buy any such business or assets;
- 6.5 the buyer in the event that Carpathian Springs SA or substantially all of its assets are acquired by such buyer; and
- 6.6 other third parties in the event that we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use, including exchanging information with other companies and organisations for the purposes of fraud protection and credit reduction.
- 7. The personal data will be stored for a period of 3 years.
- 8. You have the right to request from us access to and rectification or erasure of personal data or to restriction of processing concerning you or to object to our processing of the data as well as the right to data portability.
- 9. If we are relying on your consent to process data, you may withdraw your consent at any time by notice to us at info@aquacarpatica.co.uk.
- 10. You have the right to complain to the Information Commissioner's Office about the manner in which or otherwise in respect of the manner in which we process your personal data.
- 11. Your provision of personal data to us is a contractual requirement. If you do not supply your personal data to us, we would be unable to provide you with information, products and services that you requested from us.
- 12. Our websites and apps may, from time to time, contain links to the websites of our partner networks, advertisers and/or affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you share any personal data with these websites.
- 13. We may offer you the opportunity to use your social media login when interacting with our websites and apps. If you do so, please be aware that you will be sharing your profile



information with us. The personal data that is shared will depend on your social media platform settings. Please visit the relevant social media platform and review its privacy policy to understand how your personal data is shared and used in this context.

- 14. Some of our websites and apps allow users to submit their own content. Please remember that any content submitted to our social media platforms can be viewed by the public, and you should be cautious about providing certain personal data (for example, financial information or address details). We are not responsible for any actions taken by other individuals if you post personal data on one of our social media platforms and we recommend that you do not share such information.
- 15. We may change this Privacy Notice from time to time and such changes will take effect from the date and time the revised Privacy Notice is available on our website. Please regularly visit the Privacy Notice so that you are aware of any modifications or updates.
- 16. Questions, comments and requests regarding this Privacy Notice are welcomed and should be addressed to info@aquacarpatica.co.uk.