# **Privacy Policy**

This privacy policy (hereinafter "Privacy Policy") sets out how UDOG Srl (Hereinafter "UDOG, "we", "our", "us") process and protect any personal data in connection with the use of udog.cc, our social platforms and other contact options (hereinafter "Digital Services").

Our data processing activities are divided into the following:

- Purchases
- Browsing
- Statistics and analytics
- Contacting us in general
- Newsletter signup
- Interaction on social media

#### 1 DATA CONTROLLER

UDOG Srl is an Italian based brand of cycling shoes with office at Via Sant'Antonio, 2 - 35030 - Selvazzano Dentro (PD) - Italy. We are registered as a limited liability company in Italy with company registration number (P.I.) 05335330287.

We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified (hereinafter "Personal Data") when using our Digital Services, then you can be assured that it will only be used in accordance with this Privacy Policy.

In case you have any questions regarding our processing of your Personal Data or want to assert your rights, please contact us via the below contact information and write "GDPR" in the header:

Email: domestique@udog.cc

We may change this policy from time to time by updating this page. You should check this page regularly to ensure that you are happy with any changes. If such changes are substantial, we will notify you via email if you have shared your email address with us.

## 2 What we collect and how we lawfully process Personal Data

In relation to using our Digital Services we will be collecting and processing the following Personal Data.

#### Purchases

To fulfill an order and make sure that it will make it safely to your delivery address, we will be collecting the following Personal Data when you are placing an order:

- First name and surname
- Email address
- Billing information
- Shipping information, in case different from your billing information

 Phone number, for notifications and contact in case of changes related to the order

Our legal basis for processing ordinary Personal Data in the purchase agreement follows from Article 6(1)(b) of the GDPR on processing which is necessary for the performance of a contract to which you are part or for the implementation of measures taken at your request prior to entering a contract.

### Browsing

When visiting our website, cookies are collected in the same way as it applies elsewhere on the internet.

All information related to our use of cookies can be found in our Cookie Policy. Our basis for processing is consent in accordance with the cookie regulation.

### Statistics and Analysis

We process purchase patterns, returns and other generic data related to the sale and marketing of our products. The is part of usual data analysis, audits, development of new products, identification of popular products, the effectiveness of our marketing campaigns, and our planning of operation activities.

The Personal Data we might include in these statistics and analysis would to the extent necessary be your purchase history, areas of interest and activities on our Digital Services.

Our legal basis for processing Personal Data for statistical and analytical purposes follows from GDPR Article 6 (1)(f), on processing that is necessary for us to pursue a legitimate interest, as we as a company have a legitimate interest in developing our products. The balancing of interests is handled by us using best practice anonymization of your Personal Data to the greatest extent possible.

### Contacting us in General

You can contact us via email.

When you contact us, we naturally process your contact information and the content of your message.

Our legal basis for processing your Personal Data is Article 6(1)(f) of the GDPR regarding processing based on a legitimate interest, where your rights are not overridden, as we only process what is absolutely necessary to answer your inquiry. If your inquiry concerns an order or purchase, the conditions are described in the above section.

The correspondence is deleted when it is no longer necessary for the fulfilment of the purpose (answering the inquiry) or 6 months after the latest correspondence. If your inquiry concerns a customer, a subscriber to our newsletter or a specific purchase, the conditions for processing described in the relevant sections apply.

#### Newsletter Signup

We process your Personal Data to send you our newsletter if you have signed up on the website or by other means.

For us to send relevant newsletters we will be collecting the following information:

- Your email address
- Your preference in male or female clothing
- Your IP address for location segmentation

Our legal basis for processing your Personal Data is GDPR Article 6(1)(a), which contains processing based on consent.

You can withdraw your consent at any time by using the unsubscribe function in each email.

Your email address will be deregistered as soon as possible after you unsubscribe from the newsletter.

If there is no activity, your consent must be renewed every 3 years, as we delete your email after 1-2 reminders if the consent has not been renewed by then.

### Interaction on Social Media

We are active on different social media platforms such as Instagram, YouTube, and Facebook. When you interact with us on such platforms, you make information available to us and the social media, for example when you respond to our posts, comment, or share posts, just as we process information that you "like" us or follow us on the social media.

UDOG and the social medias may be considered joint data controllers and you should therefore be aware that the social media also process their own Personal Data about you.

The agreement on joint data responsibility can be found here:

Youtube (Google)

Facebook and Instagram (Meta)

You can read more about social media's independent processing of Personal Data here:

Youtube (Google)

Facebook and Instagram (Meta)

The legal basis for the processing your Personal Data follows from Art. 6(1)(f) of the GDPR on processing necessary for UDOG to pursue a legitimate interest where your interests are not overridden because your participation on social media is voluntary for you on the terms applicable on social media. Information shared on social media will not be automatically deleted by us. You may use the functions available at the social media or contact the specific social media for any particular deletion request(s).

## **3 Security**

We are committed to ensuring that your Personal Data is secure. In order to prevent unauthorized access or disclosure, we have put in place technical and organizational procedures to safeguard the information we collect. Unfortunately, the transmission of information via the internet is not 100% secure. We will do our best to protect your Personal Data, however we cannot guarantee the security of your data to our site; any transaction is at your own risk. Once we have received your information, will use strict procedures and

security features to try to prevent unauthorized access.

## **4 Recipients of Personal Data**

To run our services and infrastructure we are depending on multiple security-approved data processors for storing and processing your Personal Data. When we use data processors, a data processing agreement has been entered determining the subject matter and duration of the processing, the nature and purpose of the processing, the type of Personal Data and the categories of data subjects as well as our obligations and rights.

Your Personal Data is only being passed onto third party processors when it is necessary for us to provide and run a specific part of our service – e.g. when fulfilling orders or sending email newsletters.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

In connection with IT operations, including hosting, development and support, we may in certain cases transfer Personal Data to companies established in a country outside the EU/EEA. When UDOG transfers your Personal Data to third parties outside the EU and EEA, we ensure that your Personal Data and data protection rights are adequately protected by ensuring either:

- The European Commission has taken an adequacy decision;
- the implementation of additional measures for those third countries where the legislation of the country concerned so requires. You can obtain further information about our transfer of your Personal Data to third countries by writing to us.

#### 5 Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## 6 Your rights and your preferences

You may be aware that the General Data Protection Regulation or (hereinafter "GDPR") gives certain rights to individuals in relation to their Personal Data. According to the GDPR, you have several rights in relation to our processing of Personal Data about you, which include:

- Right of Access the right to be informed of and request access to the Personal Data we process about you;
- Right to Rectification the right to request that we amend or update your Personal Data where it is inaccurate or incomplete;
- Right to Erasure the right to request that we delete your Personal Data;
- Right to Restrict the right to request that we temporarily or

permanently stop processing all or some of your Personal Data;

- Right to Object the right, at any time, to object to us processing your Personal Data on grounds relating to your particular situation; the right to object to your Personal Data being processed for direct marketing purposes;
- Right to Data Portability the right to request a copy of your Personal Data in electronic format and the right to transmit that Personal Data for use in another party's service; and
- Right not to be subject to Automated Decision-making the right to not be subject to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect.

You can read more about your rights in the European Data Protection Board's guidelines on the rights of data subjects, which you can find on <a href="EDPB">EDPB</a> | <a href="European Data Protection Board">European Data Protection Board</a> (europa.eu).

If you wish to make use of or exercise any of the above rights, please contact us.