

Privacy Policy

Last updated: July 25, 2022

This Privacy Policy describes our practices regarding the processing of your personal data in compliance with the General Data Protection Regulation (GDPR, Regulation 2016/679 of the European Parliament and of the Council).

Under the GDPR “personal data” means any information relating to a “data subject”. A “data subject” (hereinafter “you”) is an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The present Privacy Policy applies to all personal data you provide to us and to also all personal data which we collect about you, either in relation to how you use our website (using “cookies”) at www.flowywear.com (hereinafter the “website”) or in relation to your purchasing patterns when you make an order with us.

The Privacy Policy provides you with important information about the protection of your personal data and your rights in this regard. If you do not agree to these terms, you have the right at any time to suspend your use of the Website and to stop browsing without providing any personal information.

I.) THE DATA CONTROLLER (hereinafter “FLÓWY”, “we”, “us” and “our”)

This website is operated and owned by:

Name: Rózsa Huong Nguyen E.V. (sole proprietor)

Registered seat: 5000 Szolnok, Áchim András utca 1.

Registration number: 56280803

Tax number: 57637215-1-36

Registry authority: NAV Jász-Nagykun Szolnok Megyei Adó- és Vámigazgatósága

Email address: info@flowywear.com

2.) GENERAL PROVISIONS

We reserve the right to modify or update any part of this Privacy Policy from time to time at our sole discretion, in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons. We therefore invite you to check this page periodically for changes. Your continued use of or access to the website following the posting of any changes constitutes acceptance of those changes. This present Privacy Policy is effective as of July 25, 2022, until withdrawal.

Our website contains links to other websites or integrated sites. FLÖWY is not liable to the contents of other websites or the practices of such websites regarding personal data collection. Our Privacy Policy applies solely to our website, therefore, when you visit other websites, you shall read their privacy policy, too.

By using this site, you represent that you are at least the age of majority in your state or province of residence, or that you are the age of majority in your state or province of residence and you have given us your consent to allow any of your minor dependents to use this site.

The headings used in this policy are included for convenience only and will not limit or otherwise affect this Privacy Policy.

3.) DEFINITIONS

1. “personal data”: any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
2. “data subject”: an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
3. “data processing”: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use,

disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

4. “data controller”: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
5. “data processor”: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
6. “consent of the data subject”: any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

4.) HOW DO WE COLLECT YOUR DATA?

We collect your personal data when you sign up for our newsletter, register to our website, make a purchase, respond to a survey or marketing communication, surf the website or use certain other site features.

When you visit the website, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the website, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the website, and information about how you interact with the website. We refer to this automatically-collected information as “device information.”

We collect “device information” using the following technologies:

“Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, please see section 12.)-14.) of this Privacy Policy.

“Log files” track actions occurring on the website, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.

“Web beacons,” “tags,” and “pixels” are electronic files used to record information about how you browse the website.

5.) WHAT DATA DO WE COLLECT AND FOR WHAT PURPOSES?

1. To process and fulfill your order, including: conclusion and execution of the contract, payment, issuance of the invoice, shipment of the product, possible management of the right of withdrawal, return and legal guarantees, customer care, the control and prevention of fraud and abusive behavior. For this purpose we collect the following data: name, address, email address, phone number, shipping address, billing address, payment details (such as payment method, card holder, card number).
2. To communicate to you about your order status. For this purpose we collect the following data: name, email address, order details.
3. To send you reminders on unfinished orders. For this purpose we collect the following data: name, email address, list of products left in your cart.
4. To create your FLÖWY account on the website. For this purpose we collect the following data: name, email address, password, date of birth (optional), country of residence (optional). In case of registration/authentication to your Account via social login: We collect and manage the necessary data for your registration/ authentication from this Third Party.
5. To handle customer care inquiries. For this purpose we collect the following data: name, email address.
6. To send you marketing communication, such as newsletters with news, offers, promotions, commercial communication and surveys. For this purpose we collect the following data: first name, email address.
7. To carry out marketing activities such as marketing surveys and market research. For this purpose we collect the following data: gender, age, country of residence, interests, habits, lifestyle, details of purchases.
8. To provide offers tailored to you and improve our website performance. For this purpose we collect the following data: details of your historical searches and historical order details. For more information on cookies, please see section 13.) of this Privacy Policy.
9. To tailor advertising to make our offers more relevant to you. For this purpose we collect the following data: email address, details of your historical searches, your wish list and historical order details. For more information on cookies, please see section 13.) of this Privacy Policy.

6.) LEGAL BASIS OF DATA PROCESSING

In case of the activities indicated in points 1-5. of Section 5.) of this Privacy Policy, the legal basis of data processing lies in Subsection (a) Paragraph (1) of Article 5 of Act CXII of 2011 on the Right of

Informational Self-Determination and on Freedom of Information (hereinafter the “Freedom of information Act”), i.e. based on your consent, and commencing from 25 May 2018 also Article 6 (1) (b) of the General Data Protection Regulation (Regulation No. 2016/679 of the European Parliament and of the Council) (“GDPR”), i.e. such processing activities are necessary for the performance of the contract or in order to take steps at the request of data, subject to entering into a contract.

In case of the activities indicated in points 6-9. of Section 5.) of this Privacy Policy, the legal basis of data processing lies in Subsection (a) Paragraph (1) of Article 5 and Subsection (a) Paragraph (2) of Article 5 of the Freedom of Information Act, i.e. based on your consent, and commencing from 25 May 2018 also Article 6 (1) (a) and Article 9 (2) (a) of the GDPR, i.e. such processing activities will be based on your consent.

7.) WHO WILL PROCESS YOUR DATA?

Your personal data can be accessed by employees and collaborators of FLÖWY as well as third parties (suppliers and/or business partners) who have been suitably selected by us and offer adequate guarantees of compliance with the rules on the processing of personal data. These third parties may carry out their activities as "data processors" (i.e. under the direct responsibility of the data controller who appointed them: for example, internet providers, companies specializing in IT and telematic services, customer service companies, companies carrying out marketing activities, companies specialized in market research and data processing, physical shops, etc.) or as "independent data controllers" (i.e. app suppliers implemented on the site, couriers and forwarding agents, companies that provide shipment services, bank operators, freelance professionals or companies providing legal or fiscal advice and assistance, etc.). The data processors shall process the personal data at most as long as the term of the data processing contract concluded with them is valid and in force, or until they are required to keep your data under the applicable data retention laws.

Your personal data may also be communicated to third parties in the following cases:

1. When the communication is required by applicable laws and regulations with respect to third parties who are legitimate recipients of communications, such as authorities and public bodies that process your data as independent data controllers for their respective institutional purposes.
2. In the case of extraordinary transactions (e.g. mergers, acquisitions, sale of business, etc.).
3. When you give your consent for independent marketing purposes.

The below entities are Processors during the data operations specified in the present Privacy Policy. By using our services, you consent to your data being shared with these entities.

Besides us, your data may be disclosed only to the competent employees of the below entities:

The entity providing data hosting services for the website: Shopify Inc.(registered seat: 151 O'Connor Street, Ground floor, Ottawa, ON K2P 2L8, Canada)

The payment processor of the Webshop is Stripe Payments Company (registered seat: 354 Oyster Point Boulevard, South San Francisco, California, 94080).

The invoicing system of the webshop is provided by Billingo Technologies Zártkörűen Működő Részvénytársaság (Registered seat:1133 Budapest, Árbóc utca 6. I. emelet).

The delivery of the products is organized by DPD Hungary Kft. (registered seat: 1134 Budapest, Váci út 33. 2. emelet) and FedEx Corporation (registered seat: 1000 Ridgeway Loop Road, Ste 600, Memphis, TN 38120, United States of America).

We may also share your data with the following entities for their own services and marketing purposes:

OneStore LLC. (registered seat: 527 E Liberty St STE 208, Ann Arbor MI 48104, USA)

"iSenseLabs", supplied by iSense LLC. (registered seat: 855 Maude Avemountain View, CA, 94043-4021, USA)

Cloverly, Inc. (registered seat: 925B Peachtree St NE #367 Atlanta, GA 30309, USA)

Google Inc. (registered seat: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA);

Facebook Ireland Ltd. (registered seat: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland)

TikTok Technology Ltd. (registered seat: 0 Earlsfort Terrace, Dublin, D02 T380, Ireland)

8.) HOW AND FOR WHAT DURATION WILL WE STORE YOUR DATA?

We have adopted security measures to ensure that our internal procedures meet our high security policy standards and to safeguard the quality and integrity of your personal data. We call your attention to take necessary precautions while using our website, such as keeping your login credentials strictly confidential and changing them from time to time.

All personal data is stored behind secured networks. Our entire website, including all pages, content, data, sensitive payment information etc. is secured using SSL encryption.

We process your personal data for the time required, in line with the purposes set out in section 5.) of this Privacy policy and/or for the period specified by the relevant regulations. At the end of the stipulated storage period, your personal data will be deleted or in any case made anonymous irreversibly, unless we are obliged to keep the data for a further period in order to comply with legal or regulatory obligations or to exercise or defend a right in court.

In case of consent-based data processing (such as newsletter subscriptions), personal data will be processed until the consent is withdrawn.

Please note that as a data subject, you can request from us the erasure of your personal data at any time.

9.) WITHDRAWAL OF CONSENT

You may, at any time, withdraw any consent you have given and we will delete your personal data, unless we can continue the processing based on another purpose. If you wish to withdraw your consent, please contact us at info@flowywear.com or proceed with the means outlined in section 15.).

10.) MARKETING

We would like to send you information about our news, products and services that we think you might like. We agree not to use false or misleading subjects or email addresses.

If at any time you would like to unsubscribe from receiving emails from us, you can email us at info@flowywear.com and we will promptly remove you from all correspondence.

11.) WHAT ARE YOUR DATA PROTECTION RIGHTS?

You may contact us at any time at the contact details and via the means specified under section 15.) to exercise your rights, and in particular:

Right to information - You have the right to be informed how your personal data is being handled and what your rights are in this regard.

Right to access – You have the right to request confirmation whether your personal data is being processed and if so, obtain copies of such personal data.

Right to rectification – You have the right to request correction of any personal data you believe is inaccurate. You also have the right to request completion of any personal data you believe is incomplete.

Right to erasure – You have the right to request the deletion of your personal data, when these, in particular (i) are no longer necessary with respect to the purposes for which they were collected or processed, (ii) have been processed unlawfully, or (iii) must be deleted in order to fulfill a legal obligation, (iv) have been opposed by you for being processed and there is no prevailing legitimate reason allowing us to proceed with the processing in any case.

Right to restrict processing – You have the right to request that we restrict the processing of your personal data. In this case, we will not treat your personal data, except for storage.

Right to data portability – You have the right to request that we transfer your personal data that we have collected to another organization, or directly to you. You may request to receive the data that we process on the basis of your consent or on the basis of a contract with you, in a structured, commonly used and machine-readable format. If you wish, we may, where technically possible, transfer your data directly to a third party specified by you, at your request.

Right to object to processing – You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data, which is based on the pursuit of a legitimate interest of us or for marketing purposes, including profiling. We shall no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

Right to avoid automated decision-making, including profiling - You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

In order to ensure the exercise of your rights, we shall implement appropriate technical and organizational measures, such as:

provide any information and any communication to you in an intelligible and easily accessible form, using concise, clear and plain language, and evaluate any request submitted by you concerning the exercise of your rights within the shortest possible time, not exceeding 25 (twenty-five) days, and to notify you of our decision in writing, or electronically, if you made the request by electronic means.

12.) WHAT ARE COOKIES?

Today, cookies are used by almost all websites and are in many cases necessary to provide a specific service on the website. Cookies are small text files that are placed on your computer or mobile phone when you browse a website such as the FLOWY website. and are used to provide an enhanced experience while browsing. They allow the website to function efficiently, improve its performance, and they also provide information to the site owner for statistical or advertising purposes, mainly for the reason to personalize your browsing experience by remembering your preferences (such as the language and currency you set, etc.).

These cookies do not identify you personally. Cookies cannot run programs or deliver viruses to your computer. They simply serve to make the browsing experience more user-friendly, and efficient as a whole.

13.) WHAT TYPES OF COOKIES DO WE USE?

We use different types of cookies for different purposes on our website. These types of cookies are either first-party cookies (set and managed by us) or third-party cookies (set and managed by third-parties according to their own privacy policy and not under our control).

Essential Navigation cookies

Navigation cookies are technical cookies and are essential for the operation of this website. The purpose of these cookies is to allow visitors to seamlessly browse the website as well as its features and services. These cookies do not collect information to be used for commercial purposes and are automatically deleted from your device once you close the browser. Please note that if you disable these cookies in your browser settings, it may cause performance issues on the website during your visit.

Functional cookies

These cookies enhance the performance and functionality of the website. Based on your express request, these cookies can recognize you during repeated visits and allow you not to enter your details repeatedly (e.g. “recognize me next time”). If you add items to your shopping bag and close your session, these cookies also allow you to continue your shopping the next time you access the website (within a limited time) by allowing you to find the previously chosen items in the shopping bag. They can also allow us to personalize your content by remembering your preferences.

While functional cookies are not indispensable for the proper functioning of the website, they improve the quality and browsing experience of the website.

FLÖWY, our trusted service providers and permitted third-parties may also advertise our products on third-party websites, which may also use cookies and/or other tracking devices. We do not have control over these tracking technologies used by third-party websites. As such, you should carefully review the privacy policies of those-third-party websites to understand their policies.

Analytical cookies

These first party cookies are used to compile visitor statistics in order to see where the website needs improvement. They perform statistical analysis on how users navigate the site, what type of technology they are using, how much time they spend on the site, the more frequently visited pages, etc. All the information is collected anonymously and in an aggregated form.

First and third party marketing and profiling cookies

The purpose of these cookies is to display advertisements that are tailored to the visitors' interests and preferences, in order to improve the browsing experience. Third party cookies are sent by third party companies we trust and allow us to offer you our services on other affiliated websites (remarketing cookies). The whole process is anonymised and information gained from these cookies are not personally identifiable. All the information is controlled by the third party companies as described in their privacy policies, and we do not have access to any of this information. You can learn more about online advertising at www.youronlinechoices.com and can also opt-out of almost all advertising cookies at www.youronlinechoices.com/uk/your-ad-choices. Please note that opting out of advertising cookies will not mean that you will not see advertisements, just that they will not be tailored to you any longer.

Social Network Cookies

These cookies are required to allow your social account to interact with our website, for example via the “share” button. These cookies are not essential for browsing. You can find more information about the cookie policies of different social network services via the following links:

Facebook: <http://www.facebook.com/about/privacy/>

Instagram: <https://instagram.com/legal/cookies/>

Linkedin: <https://www.linkedin.com/legal/privacy-policy>

Cookies we use

Cookies Necessary for the Functioning of the website:

Name	Function	Duration
_ab	Used in connection with access to admin.	2 years
master_device_id	Used in connection with merchant login.	2 years
signed_in	Used in connection with Shop login.	1 year
user	Used in connection with Shop login.	1 year
secure_customer_sig	Used in connection with customer login.	20 years
storefront_digest	Used in connection with customer login.	2 years
_secure_session_id	Used in connection with navigation through a storefront.	24 hours
_Brochure_session	Used in connection with browsing through website.	-
_shopify_m	Used for managing customer privacy settings.	1 year
_shopify_tm	Used for managing customer privacy settings.	30 minutes
_shopify_tw	Used for managing customer privacy settings.	2 weeks
_storefront_u	Used to facilitate updating customer account information.	1 minute
_tracking_consent	Tracking preferences.	1 year
keep_alive	Used in connection with buyer	2 weeks

	localization.	
cart	Used in connection with shopping cart.	2 weeks
cart_currency	Used in connection with shopping cart.	2 weeks
cart_ver	Used in connection with shopping cart.	2 weeks
cart_sig	Used in connection with checkout.	2 weeks
cart_ts	Used in connection with checkout.	2w
c	Used in connection with checkout.	1 year
checkout	Used in connection with checkout.	4 weeks
checkout_token	Used in connection with checkout.	1 year
dynamic_checkout_shown_on_cart	Used in connection with checkout.	30 minutes
hide_shopify_pay_for_checkout	Used in connection with checkout.	session
previous_step	Used in connection with checkout.	1 year
_shopify_country	Used in connection with checkout.	session
remember_me	Used in connection with checkout.	1 year
shopify_pay	Used in connection with checkout.	1 year
shopify_pay_redirect	Used in connection with checkout.	30 minutes, 3 weeks or 1 year depending on value

tracked_start_checkout	Used in connection with checkout.	1 year
checkout_one_experiment	Used in connection with checkout.	session

Reporting and Analytics:

Name	Function	Duration
_landing_page	Track landing pages.	2 weeks
_orig_referrer	Track landing pages.	2 weeks
_s	Shopify analytics.	30 minutes
_shopify_d	Shopify analytics.	session
_shopify_fs	Shopify analytics.	30 minutes
_shopify_s	Shopify analytics.	30 minutes
_shopify_y	Shopify analytics.	1 year
_y	Shopify analytics.	1 year
_shopify_evids	Shopify analytics.	session
_session_id	Shopify analytics.	-
_shopify_uniq	Shopify analytics.	-
*_assignment	Shopify analytics.	-
ab_test_*	Shopify analytics.	-
cart_sig	Shopify analytics.	-
ki_r	Shopify analytics.	-
ki_t	Shopify analytics.	-
_shopify_sa_p	Shopify analytics relating to marketing & referrals.	30 minutes
_shopify_sa_t	Shopify analytics relating to	30 minutes

	marketing & referrals.	
_shopify_ga	Shopify and Google Analytics.	session

Do Not Track Requests

We automatically collect cookies and other information when you visit the website. Please note that due to this, we do not alter our website’s data collection and use practices when we see a Do Not Track signal from your browser. For the information on how to opt-out of the collection of information by other tracking services, please see Section 14.) below.

14.) HOW TO MANAGE YOUR COOKIES?

As specified by the cookie banner, you can give your consent to the use of cookies by clicking on the “Accept” button. You may also set your preferences by clicking on the “Preferences” button.

Also, you can configure your browser settings according to your preferences, such as set your browser not to accept cookies, as well as control them and delete them from your browser. However, please note that disabling navigation or functional cookies may cause our website to malfunction and/or restrict the services we offer as a result.

Most browsers offer different possibilities to protect your privacy. You can find instructions on how to manage cookies in the Help function of your browser or in the user manual of your smartphone with Internet access used. To change your browser settings, please refer to the below links and instructions:

[Google Chrome](#)

[Mozilla Firefox](#)

[Apple Safari](#)

[Internet Explorer](#)

[Opera](#)

If you use another computer or change browsers you will need to repeat the process of refusing or deleting cookies. For more information about cookies including how to set your internet browser to reject cookies please visit www.allaboutcookies.org.

Certain devices may also allow you to limit Ad Tracking. Please refer to the settings on your computer or smartphone for information on how to disable Ad Tracking.

You can also set preferences for how Google advertises to you via the Google Ad Settings page. You may also opt out by visiting the Network Advertising Initiative Opt Out Page or by using the Google Analytics opt Out browser add on.

15.) HOW TO CONTACT US

If you want us to update, amend or delete the personal data that we have recorded about you, wish to get access to the data being processed about you, or if you have any questions concerning the above guidelines, you may proceed with one of the following options:

To exercise your rights under the GDPR, please visit our GDPR Compliance page [here](#).

To exercise your rights under the CCPA, please visit our CCPA Compliance page [here](#).

To exercise your rights under the APPI, please visit our APPI Compliance page [here](#).

You may also contact us at info@flowywear.com or write to us at the following address:

FLÖWY

Áchim András utca 1.

5000 Szolnok

Hungary

16.) HOW TO CONTACT THE APPROPRIATE AUTHORITIES

If you wish to appeal against the processing of your personal data, please contact us by email or or letter as indicated in section 15.) above. You may also contact the Hungarian National Privacy Authority (Registration number: NAIH-142470/2018).

Hungarian National Privacy Authority

22/c Szilágyi Erzsébet fasor

1122 Budapest

Hungary

+36 1 391 1400

www.naih.hu