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# LYO DOG ONLINE SHOP

## PRIVACY POLICY

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### Definitions

**Personal data:** is any data relating to an identified or identifiable individual 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 individual.

**Processing of personal data:** means any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Processing may be manual or automated.

### Privacy Policy

This Privacy Policy governs the collection, storage and processing of personal data that Planet to the 3<sup>rd</sup> power collects from you when you use the <http://www.lyodog.si> and <http://www.lyodog.com> (the "Website"). A user is any legal or natural person who uses or visits the website ("User"). The controller of personal data within the meaning of the EU General Data Protection Regulation and the applicable Slovenian legislation on the protection of personal data is:

**Company info:** Planet to the 3<sup>rd</sup> power, project management and consulting, Zarja Šinkovec s.p.

Veliki otok 44b

6230 Postojna

Slovenia

**Registration number:** 8865086000,

**Tax number:** 69714428

(hereinafter referred to as: Controller).

In addition to the Privacy Policy, please also read the Terms and Conditions, which regulate the business relationship between the user and the operator, and the Cookie Policy, which discloses which cookies we collect and for what purposes. We will only use the personal data collected on

the website as set out in this Privacy Policy. Please see below for information about how we use your personal information, the purposes for which your personal information is used, who we share it with, and what rights of control and information you have.

By using the Website, you consent to the collection, use and disclosure of your information (including personal information) in accordance with this Privacy Policy. We may receive and/or ask you to provide your information (including personal information) whenever you interact with us or use the Website. As detailed below, we share your information (including Personal Information) with third party partners (as each is detailed below) and use it in ways that are consistent with this Privacy Policy. We may use your information (including personal information) together with other information to provide and improve our products, services and content. Planet to the 3<sup>rd</sup> power is committed to protecting all personal information of the customer at all times.

## Changes to the Privacy Policy

The Operator reserves the right to adapt the Privacy Policy from time to time, as necessary, to the actual situation and legislation in the field of personal data protection. For this reason, we ask you to check the current version before each submission of personal data to ensure that you are aware of any changes and additions. We will also inform you in advance of any changes that significantly affect the processing of your personal data in an appropriate manner (e.g. by means of a notice on our website, by email). The date of the most recent Privacy Policy is recorded in the document.

## Informative use of the website

If you visit our website <http://www.lyodog.si> and <http://www.lyodog.com> for informational purposes, i.e. without providing personal data in any form, we may automatically collect information about you, which will only contain personal data in limited cases and will be automatically recognised by our server, such as:

- The website from which you were directed to our website,
- The date and time of your requests,
- Device type, screen resolution and browser version,
- Your internet service provider,
- Information about your operating system, including language settings,
- Information about offers you have visited on our website.

We use this information only to help us provide you with an effective service (e.g., to tailor our website to the needs of your device) and to collect broad demographic information for anonymous aggregate use. The personal information we automatically collect is necessary for

the provision of the website and for our legitimate interest in ensuring the stability and security of the website. The personal information that is automatically collected is immediately anonymised and all personally identifiable information is deleted accordingly.

## Using the website to buy products

Our website <http://www.lyodog.si> and <http://www.lyodog.com> offers an online shop for buying our products. If you visit our website to make a purchase, we process the following data in connection with such use of the website:

- Your name, address, telephone and e-mail,
- Communications you have sent (e.g. via email or communication forms on the website),
- Whenever you carry out transactions via our website, further data processing procedures may take place, of which you will of course be specifically informed.

We will use your personal data to make our products and services available to you (e.g. delivery of ordered products, delivery of courses) and to provide you with requested information or to communicate with you. The personal data we collect is necessary for the performance of contractual obligations between the user and the controller (processing based on the law and contractual relations) as well as for our legitimate interest.

## Online advertising

Our website uses online advertising services to present you with advertisements that are relevant to your interests. Such advertising is identified by the name of the provider (e.g. Google Ads). This service helps us to improve our website and make your visit more interesting. For this purpose, we collect statistics about you which are processed by the provider of such advertising. Such processing represents our legitimate interest in improving your experience of our website and in promoting our products and services.

## Social plug-ins

The Website may include social networking features, such as follow and share buttons, provided by social networks such as Facebook and Instagram. These social networking features may collect your IP address, which page you visit on our website, and may also set a cookie to enable the social networking feature to function properly. Social networking features are usually hosted by a third party, but may also be hosted directly on our website. Your interactions with these social networking features are governed by the privacy policy of the social network offering such feature. If you have any further questions about social networking features, please contact us at [info@lyodog.com](mailto:info@lyodog.com).

## Web analytics

For statistical analysis, we use web analytics services to collect information about the use of this website:

- General tracking information
- Web analytics service tools collect information such as:
  - Device and browser information (operating system information, mobile device identifier, mobile operating system, etc.),
  - IP address
  - Website access; URL clickstream (chronological order of our websites you have visited)
  - Geographical location
  - Time of visit
  - The referring website, application or service from which you were directed to our website.

We only use the information we receive from web analytics tool providers to determine the most useful information you are looking for and to improve and optimise the website. We do not combine the information collected by such tools with personal information.

Depending on the provider of the web analytics tools, the data collected about your use of the website may be transferred to and processed in third countries, e.g. the USA. For further information on the potential risks of cross-border data transfers, please refer to the "Cross-Border Data Transfers" section of this Privacy Policy. These tools only collect the IP address assigned to you on the date you visit our website, not your name or other identifying information. The providers of such tools will use this information to evaluate your use of the website, to compile reports on website activity, and to provide other services related to website usage.

The legal basis for such data processing is our legitimate interest in analysing the traffic on our website and improving the user experience and optimisation of the website in general.

## Opting out of web analytics

You may opt-out of future collection of your personal data by us and Google Analytics at any time in accordance with this Privacy Policy for analytics purposes by following the instructions at this link: <https://tools.google.com/dlpage/gaoptout>.

## Cookie Policy

This Cookie Policy aims to provide you with general information about the cookies used by the LYO DOG website for its smooth operation, as well as the options available to users of the website, and information regarding specific cookies used by Planet to the 3<sup>rd</sup> power or by third parties with our consent. This Cookie Policy forms part of Planet to the 3<sup>rd</sup> power's General Terms

and Conditions and Privacy Policy. By using our website, you agree to this website setting cookies on your device.

## Editing cookies

Users of the LYO DOG website are offered the opportunity to choose whether to accept or reject cookies. Please note that their exclusion may lead to problems with the website, excessive advertising and other problems. If you consent to cookies and later change your mind, you will need to reset your decision by deleting the cookies. After deletion, you will be notified again whether you want cookies.

## Changes to the cookie policy

Planet to the 3<sup>rd</sup> power reserves the right to change or amend the Cookie Policy at any time. It is your responsibility to make yourself aware of any changes. The date of the most recent Cookie Policy is recorded in the document.

## Data sharing

Your personal data will only be disclosed to third parties to the extent necessary for the performance of our contractual relationship. The legal basis for the transfer of your personal data is Article 6(1)(b) and (f) of the EU General Data Protection Regulation and constitutes our legitimate interest for the performance of our General Terms and Conditions or other contracts concluded with you.

For the purpose of describing our services and for other legitimate purposes, we may disclose anonymous aggregate statistics about website users to potential partners, advertisers and other reputable third parties, but such information will not contain any personal data.

We may disclose your personal information to our contractors who assist us in providing the services we offer through the Website. Such transfer will always be based on a personal data processing agreement, which means that our contractors will only use your personal data to the extent necessary to carry out their functions and will be contractually obliged to process your personal data only on our behalf and in accordance with our requirements.

## Cross-border data transfers

As part of the data sharing activities described above, your personal data may be transferred to other countries (including countries outside the European Economic Area - EEA) which may have different data protection standards from the country in which you reside. Please note that data processed in a foreign country may be subject to foreign laws and accessible by foreign governments, courts, law enforcement and regulatory agencies. Notwithstanding the foregoing, we will endeavour to take reasonable steps to maintain an adequate level of data protection when sharing your personal data with such countries.

In the case of transfers outside the EEA, these transfers are protected by either EU privacy shields or model contractual clauses. For further information on the above safeguards, please contact us at [info@lyodog.com](mailto:info@lyodog.com).

## Security

We have put in place reasonable state-of-the-art security measures to protect against the loss, misuse and alteration of your personal data, which are under our control. For example, our security and privacy policies are regularly reviewed and improved as necessary, and only authorised personnel have access to personal information. Although we cannot guarantee or warrant that loss, misuse or alteration of information will never occur, we use all reasonable efforts to prevent it.

You should note that sending information over the Internet is never completely secure. We cannot guarantee the security of information you send via our website, even if it is in transit over the internet and any transmission is at your own risk.

## Data retention

We endeavour to keep our processing activities in relation to your personal data as limited as possible. If no retention periods are specified in this Privacy Policy, your personal data will only be retained for as long as we need it to fulfil the purpose for which it was collected and, if necessary, for as long as required by the statutory data retention periods.

## Rights of the data subject with regard to data processing

Under the provisions of the EU General Data Protection Regulation, you have the following rights as an individual:

- Right to withdraw consent: if you, as an individual, have consented to the processing of your personal data (for one or more specified purposes), you have the right to withdraw your consent at any time without affecting the lawfulness of the processing of the data carried out on the basis of the consent until its withdrawal. Consent may be withdrawn by sending a written statement to the controller at one of the contacts indicated on the website [www.lyodog.si](http://www.lyodog.si) or [www.lyodog.com](http://www.lyodog.com). The withdrawal of consent to the processing of personal data shall not have any negative consequences or sanctions for the data subject. However, it is possible that the controller may no longer be able to provide one or more of its services to the data subject after the withdrawal of the consent to the processing of personal data, if these are services that cannot be provided without the personal data.

- Right of access to personal data: as an individual, you have the right to obtain confirmation from the provider (data controller) as to whether personal data relating to you is being processed and, where this is the case, access to personal data and certain information (on the purposes of the processing, on the types of personal data, on the users, on the retention periods, etc.). The existence of the right to rectification or erasure, the right to restrict and object to processing and

the right to lodge a complaint with a supervisory authority, the source of the data if the data were not collected from you, the existence of automated decision-making, including profiling, the reasons for it and the meaning and consequences of such processing for you, and other information in accordance with Article 15 of the EU General Data Protection Regulation.

- Right to rectification of personal data: as an individual, you have the right to have personal data concerning you erased by the provider without undue delay and the provider must erase the data without undue delay where one of the following conditions applies:

- The data are no longer necessary for the purposes for which they were collected or otherwise processed
- If you withdraw your consent and there is no other legal basis for the processing
- If you object to processing and there are no overriding legitimate grounds for processing
- The data have been unlawfully processed
- The data must be erased in order to comply with legal obligations under EU or Member State law applicable to the provider
- The data was collected in connection with the offer of information society services.

However, as an individual, you do not have the right to erasure in certain cases described in Article 17(3) of the EU General Data Protection Regulation.

Right to restriction of processing: as an individual, you have the right to have the provider restrict processing where one of the following applies:

- If you contest the accuracy of the data for a period of time that allows the provider to verify the accuracy of the data
- The processing is unlawful and you object to the erasure of the data but instead request the restriction of its use
- The provider no longer needs the data for the purposes of the processing, but you need the data to assert, exercise and defend legal claims
- You have objected to processing until it is verified whether the legitimate grounds of the provider outweigh your grounds.

Right to data portability: as a data subject, you have the right to receive the personal data relating to you that you have provided to the provider in a structured, commonly used and machine-readable format, and you have the right to transfer that data to another controller without being hindered by the provider to whom the personal data have been provided, where:

- The processing is based on consent or on a contract; and
- The processing is carried out by automated means.

In exercising that right, you, as an individual, have the right to obtain the direct transfer of personal data from one controller (provider) to another, where this is technically feasible.

Right to object to processing: As an individual, you have the right, on grounds relating to your particular situation, to object at any time to processing of personal data which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the provider (point (e) of Article 6(1) of the EU GDPR) or which is necessary for the pursuit of legitimate interests pursued by the provider or by a third party (point (f) of Article 6(1) of the EU GDPR), including profiling based on that processing. The Provider shall cease processing personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Where personal data is processed for marketing purposes, the data subject shall have the right to object at any time to processing of data concerning him or her for such marketing purposes, including profiling insofar as it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the data shall no longer be processed for those purposes.

Where data are processed for scientific or historical research purposes, or for statistical purposes, the data subject shall have the right to object, on grounds relating to his or her particular situation, to processing concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Right to lodge a complaint with a supervisory authority: without prejudice to any other (administrative or other) legal remedy, you as an individual have the right to lodge a complaint with a supervisory authority, in particular in the country in which you are habitually resident, where you work or where the breach is alleged to have taken place (in Slovenia this is the Information Commissioner), if you consider that the processing of your personal data infringes data protection rules.

Without prejudice to any other (administrative or extra-judicial) remedy, you as an individual have the right to an effective remedy against a legally binding decision of the supervisory authority in relation to you, and also in the event that the supervisory authority does not consider your complaint or does not inform you of the status of the case or of the decision on the complaint within three months. The courts of the Member State where the supervisory authority is established have jurisdiction over proceedings against the supervisory authority.

For the purposes of reliable identification in the event of the exercise of rights relating to personal data, the provider may request additional information from the data subject, but may refuse to act only if it demonstrates that it cannot reliably identify the data subject.

The provider must respond to the individual's request to exercise his or her rights with regard to personal data without undue delay and at the latest within one month of receipt of the request.



Right to lodge a complaint with a supervisory authority Without prejudice to any other administrative or legal remedy, you, as a data subject, have the right to lodge a complaint with a supervisory authority, in particular in the Member State in which you are habitually resident, where you work or where the breach is alleged to have occurred, if you consider that the processing of personal data concerning you infringes the EU General Data Protection Regulation. The supervisory authority with which the complaint is lodged will inform you, as the complainant, of the status of the case and the decision on the complaint, including the possibility of a remedy under Article 78 of the EU GDPR. As a data subject, you have the right to lodge a complaint with the Information Commissioner.

Date: 1.9.2021