Privacy Policy

1. Estin Warehousing OU (EW) based in Kadastiku 39B 21004, Narva Eesti (Estonia), is committed to safeguarding the privacy of our customers and users (you / your) and the Personal Information you have entrusted to us. It is important for you to understand what Personal Information we will collect, how we will use it, and who may access it.

2. This Privacy Policy applies to the operations of EW in the European Economic Area (EEA). It gives you rights by operation of the EU GDPR. If you live outside the EEA, EW will undertake best efforts to give you a similar degree of control over your privacy.

3. **Personal Information** means information about an identifiable individual. It includes information that you have provided to us or was collected by us from other sources. It may include details such as your name, surname, address, telephone number, e-mail address, age, gender, information for payments and personal references, to the extent permitted by local laws.

4. If you are an existing customer of ours, further details about how we use your Personal Information is set out in your customer contract with us.

5. Our websites may contain links to other third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your Personal Information. Please check these policies before you submit any Personal Information to such third party websites.

6. Your Personal information will be processed in order to execute orders on the basis of Article 6, Paragraph 1, Item b under GDPR (for the performance of a contract). We also will collect and process all or some of the following Personal Information about you:

• Information you provide to us: Personal Information that you provide to us, such as when using the contact form on our website, including your name, email address, and other contact details.

• Our correspondence: if you contact us, we will typically keep a record of that correspondence.

• Survey information: we may also ask you to complete surveys that we use for research purposes. In such circumstances we shall collect the information provided in the completed survey.

• Marketing preference information: details of your marketing preferences (e.g. communication preferences) and information relevant to selecting appropriate products and services to offer you. Your personal data will be stored for marketing purpose for duration of the contract or until you object to such processing, depending on which of these events occurs earlier.

• Website and communication usage: details of your visits to the our websites and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system and other communication data.

• Pursuing claims in connection with the performance of the contract.

• Performance of obligations resulting from legal regulations, including in particular tax and accounting.

• Preventing abuse and fraud

• Statistical and company records

• In the case of organization of loyalty programs, competitions and promotional campaigns in which you can take part – we will process your data during their duration and the period for settlement of the awarding of prizes. In order to ensure accountability, i.e. to prove compliance with the provisions on the processing of personal data, we will store data for the period, in which Estin Warehousing OU is obligated to maintain data or documents containing customer details to document the fulfillment of legal requirements and enable control of their fulfillment by public authorities.

7. We set out the purposes for which we use Personal Information that we collect via our website and, in compliance with our obligations under European law, identify the “legal grounds” on which we rely to process the information. These “legal grounds” are set out in European Data Protection Law, which allows companies to process personal data only when the processing is permitted by the specific “legal grounds” set out in law:

**Consent:** where you have consented to our use of your information.

**Contract performance:** where your information is necessary to enter into or perform our contract with you.

**Legal obligation:** where we need to use your information to comply with our legal obligations.

**Legitimate interests:** where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.

**Legal claims:** where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party.

8. If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

9. Please note that in addition to the disclosures we have identified below, we may disclose Personal Information for the purposes we explain in this notice to service providers, contractors, agents, advisors (e.g. legal, financial, business or other advisors) and other companies who help to perform activities:

• **To provide and manage products and services you have requested:** to administer our services, including carrying out our obligations arising from any agreements entered into between you and us, or to notify you about changes to our services and products.

• **Use justifications:** contract performance; consent, legitimate interests (to enable us to perform our obligations and provide our services to you or to notify you about changes to our service).

• **To communicate with you regarding products and services that may be of interest:** to provide you with updates and offers, where you have chosen to receive these. We may also use your information to market our own and our selected business partners’ products and services to you by way of post, email, phone or online or social media advertisement. Where required by law, we will ask for your consent at the time we collect your data to conduct any of these types of marketing. We will provide an option on the appropriate platform to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you.

• **To understand our customers and to develop and tailor our products and services:** we may analyze the Personal Information we hold in order to better understand your preferences and marketing requirements, as well as to better understand our business and develop our products and services.

• **To monitor certain activities:** to monitor queries and transactions to ensure service quality, compliance with procedures, terms of use and policies and to combat fraud.

• **To inform you of changes** ► to notify you about changes to our services and products.

• **To reorganize or make changes to our business.**

• **In connection with legal or regulatory obligations:** We may process your Personal Information to comply with our regulatory requirements or dialogue with regulators as applicable which may include disclosing your Personal Information to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so.

10. We will only use or disclose your Personal Information for the purpose(s) it was collected and as otherwise identified in this Privacy Policy.

11. Personal Information may be provided to third parties, including anti-fraud organizations, legal, regulatory or law enforcement authorities in cases of suspected criminal activity or contravention of law, for the detection and prevention of fraud, or when required to satisfy the legal or regulatory requirements of governments, regulatory authorities or other self-regulatory organizations, or to comply with a court order or for the protection of our assets.

12. We may use affiliates or other companies to provide services on our behalf such as data processing, account administration, fraud prevention and detection, analytics and marketing. Such companies will be given only the Personal Information needed to perform those services and we do not authorize them to use or disclose Personal Information for their own marketing or other purposes. We have contracts in place holding these companies to the same standards of confidentiality by which we are governed.

13. Your Personal Information may be accessed by staff, suppliers or other persons in, transferred to, and/or stored at, a destination outside the European Economic Area (EEA) in which data protection laws may be of a lower standard than in the EEA. We will, in all circumstances, safeguard personal information as set out in this Privacy Policy. Where we transfer Personal Information from inside the European Economic Area (the EEA) to outside the EEA, we may be required to take specific additional measures to safeguard the relevant Personal Information.

14. We have agreements and controls in place with third party service providers requiring that any information we provide to them must be safeguarded and used only for the purpose of providing the service we have requested the company to perform.

15. All information you provide to us is stored on our or our subcontractors’ secure servers and accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

16. Our retention periods for personal data are based on business needs and legal requirements. We retain your Personal Information for a maximum of 10 years from the date of completion of the contract or as long as is necessary for the processing purpose(s) for which the information was collected, and any other permissible, related purpose. For example, we may retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, or to comply with regulatory requirements regarding the retention of such data.

17. If you have any questions in relation to our use of your Personal Information, you should first contact us as per the “Contacting Us” section below. Under certain conditions, you may have the right to require us to:

• provide you with further details on the use we make of your information,

• provide you with a copy of information that you have provided to us,

• update any inaccuracies in the Personal Information we hold,

• delete any Personal Information we no longer have a lawful ground to use,

• where processing is based on consent, to withdraw your consent so that we stop that particular processing,

• object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights,

• restrict how we use your information whilst a complaint is being investigated.

18. If you exercise any of these rights we will check your entitlement and respond in most cases within a month.

If you have any questions or concerns about our privacy practices, the privacy of your Personal Information or you want to change your privacy preferences, please let us know to contact at kostishchina.g@redmond.company.

19. **OÜ Alinea Õigusbüroo** (11188107, Tallinn Highway 9, Narva, Estonia) is representative Estin Warehousing OU on the territory of EEA.

20. We may change the content of our websites and how we use cookies and consequently our Privacy Policy may change from time to time in the future. If we change this Privacy Policy we will update the date it was last changed below.

This Privacy Policy was last updated on 24 May 2018.

*I agree that my personal information will be stored and processed in EW c in accordance with GDPR and EW Privacy Policy.*

*I have read and agree to these terms and privacy.*