

PRIVACY POLICY.

OUR PRIVACY POLICY IN A GLANCE.

1. **Who we are.** We are **MENAKI** and we process your personal data as joint controllers. This means that *we are jointly responsible for how we process and protect your data. See more in the explanation below.*
2. **What do we use your data for?** We will use your data (obtained online), among others purposes, **to manage the purchase** of products or services, to **attend to your queries**, as well as to, if you wish, send you our personalised communications. *See more in the explanation below.*
3. **Why do we use it?** We are entitled to process your data by different reasons. The main reason is that we need to treat them to **execute the contract** you accept with us by making a purchase or enjoy any of our services or functionalities, although there are other reasons legitimize this, such as the interest in attending to your queries or **the consent** you give us to send you our newsletter, among others. *See more in the explanation below.*
4. **Who do we share your data with?** We will share your data with service providers who help or support us, such as transport companies, who deliver your shipment to your home. *See more in the explanation below.*
5. **Your rights.** You have the right to access, rectify or delete your personal data. In some cases, you also have other rights, for example to object to our use of your data or to carry it out, as explained in detail below. *See more in the explanation below.*

We encourage you to read our full Privacy Policy below to understand in depth the manner in which we will use your personal data and your rights over your data.

BEFORE WE START...

- In this **Privacy Policy** you will find **all the relevant information** that applies to our use of **the data of our clients and users**, regardless of which MENAKI channel or medium in SPAIN you use to interact with us.
- **We are transparent** about what we do with your personal data, so that you understand the implications of uses we make or rights you have in relation to your data:
 - We make **permanently** available to you **all the information** in this Privacy Policy that you can consult when you deem it appropriate and also,
 - you will find **information** about each processing of your personal data **as you go interacting with us.**
- Some names we will use in this Privacy Policy:
 - When we talk about our **Platform**, we will generally refer to any of the channels or media digital or in person that you have used to interact with us, the main ones are

- Our **website**, www.menaki.es.
- By traditional post, email or telephone.

1. WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR DATA?

The person responsible for the processing of your data is:

LAURA RAMOS PUERTAS, a company that currently operates in Spain the sale of household products, under the name of **MENAKI**.

E-mail address of the Data Protection Officer: info@menaki.es

In other words, **MENAKI** (hereinafter "We"), is the data controller. This means that we become charge of treating and protecting your personal data.

2. FOR WHAT PURPOSE DO WE PROCESS YOUR PERSONAL DATA?

Depending on the products, services or functionalities you want to enjoy at any given time, we will need treat some data or others, which in general will be, according to the case, the following:

- your **identification** data (for example, your name, surname, language and country from which you interact with us, contact details, etc)
- **economic and transactional** information (e.g. your payment or card details, information about your purchases, orders, returns, etc.)
- **connection, geolocation and navigation** data (in case you interact with us from your mobile phone, by example)
- **commercial** information (e.g. if you subscribe to our newsletter), data about your tastes and preferences.

Remember that, when we ask you to fill in your personal details to give you access to some functionality or service of the Platform, we will mark some fields as obligatory, since they are data that we need to be able to give you the service or give you access to the functionality in question. Please note that if you choose not to provide us with this information, it is you may not be able to enjoy these services or features.

Depending on how you interact with our Platform, we will treat your personal data for the following purposes:

1. For **development, compliance and execution of the purchase and sale or of services** that you have contracted with us in the Platform.

This purpose includes the processing of your data for, mainly:

- **Contacting you** regarding updates or communications information **related to the functionalities, products or contracted services**, including the sending of **quality surveys** on the products or services provided.
- **Manage the payment** of the products you buy, independently of the means of payment used. For example:

- Activate the necessary mechanisms in order to **prevent potential frauds against you and Us** during the purchase process. If we consider that the operation may be fraudulent, this treatment can result in blocking the transaction.
- **Manage possible returns** once you have made a purchase and manage **requests for information on the availability of garments, product reserves through the Platform**, depending on these options are available at any time.
- For billing purposes and to make available the tickets and invoices for the purchases you have made in the Platform.

2. In order to meet the requests or requests that you make through the channels of **Attention to the Customer**.

We only process personal data that is **strictly necessary** for manage or resolve your application or request. In addition, we record the IP from where the consultation has taken place, for the sole purpose of verifying that accepted these privacy policies in accordance with current legislation.

3. **For marketing purposes** This purpose includes the processing of your data mainly for

- To the extent that you subscribe to our Newsletter, we will process your personal data to **manage your subscription**, including **sending personalized information** about our products or services through various means (such as email or SMS). We may also send you this information through push notifications if you have activated them on your mobile device.
 - Therefore, please note that this data processing involves **analysing your user or customer profile** to determine your preferences and therefore which products and services may be most suited to your style when sending you information. For example, based on your shopping and browsing history (i.e. what you clicked on), we will make suggestions about products that we believe may interest you and, if you are a registered user, we will provide you with cart recovery" functionality.
 - Remember **that you can unsubscribe from the Newsletter at any time** and free of charge through the "Newsletter" of the Platform, as well as through the indications that we provide you with in each communication. If you do not want to receive push notifications, you can deactivate this option on your mobile device.
 - Carry out **promotional actions** (e.g. for the development of competitions or sending your list of articles saved to the email address you specify). To participate in any promotional action, you authorize us to we will process the data you provide according to each action and we can communicate them through various media such as social networks or on the Platform itself. In each promotional action in which you participate you will have available legal bases where we will provide you with more information detailed information about the treatment of your data.
 - Disseminate on the Platform or through our channels in the social networks photos or images you have shared from public form, as long as you give us your consent to it.

4. Usability analysis and quality for the improvement of our services.

If you access our Platform, we inform you that we will treat your data **for analytical and statistical purposes**, i.e. to understand the way in which users interact with our Platform and thus be capable of making improvements to it.

Likewise, we sometimes carry out **quality actions and surveys** to know the level of satisfaction of our customers and users and detect those areas where we can improve.

3. WHAT IS THE LEGITIMACY FOR THE PROCESSING OF YOUR DATA?

The legal basis that allows us to process your personal data also depends on the purpose for which we process it, as follows explained in the table below:

Purpose Legitimation

1. Development, compliance and implementation of the sales or service contract

The processing of your data is necessary for the **execution of the contract of sale or service provision** that we linked with you.

It is possible that some data processing associated with the process are activated only because you request it or we authorizations, such as informing you of the availability of our products. In these cases, the basis on which we deal your data is your own **consent**.

We consider that we have a **legitimate interest** in carrying out necessary checks to detect and prevent possible frauds when you make a purchase. We understand that the processing of these data is positive for all parties that intervene when payment is made for a purchase and in particular for you since it allows us to put measures to protect you against fraud attempts by third parties.

2. Customer Service

We consider that we have a **legitimate interest** in attending to requests or queries you make to us through the various existing means of contact. We understand that the treatment of these data is also beneficial for you as allows us to serve you properly and solve the queries raised.

When you contact us, in particular for incident management related to your order or the product/service purchased from through the Platform, the treatment is necessary **for execution of the sales contract**.

When your consultation is related to the exercise of rights we inform you about below, or with complaints related to our products or services, we will that legitimizes us to process your data **is the fulfilment of legal obligations on our part**.

3. Marketing

The legitimate basis for processing your data for marketing purposes is **the consent** you give us, for example, when you agree to receive personalised information through various means, when you authorize the sending of push notifications in your mobile device, or when you accept the legal basis for participate in a promotional action or to publish your photographs on the Platform or on our network channels social.

To show you personalized information, we consider that we have a **legitimate interest** in profiling with the information we have about you (such as the navigation that purchases, preferences or history) and the data personal information that you have given us as an age range or language, as we understand that the processing of these data also is beneficial for you because it allows you to improve your experience as a user and access information in accordance with your preferences.

4. Usability and quality analysis

We consider that we have a **legitimate interest** in analysing usability of the Platform and the degree of user satisfaction as we understand that the processing of these data also is beneficial for you because it is intended to improve the experience and offer a higher quality service.

4. HOW LONG WILL WE KEEP YOUR DATA?

The period of time for which your data will be kept depends on the purposes for which they are processed, as explained to

continued:

Purpose Storage period

1. Development, compliance and execution of the contract of purchase or service.

We will process your data for as long as necessary to manage the purchase of the products or services you have purchased, including possible returns, complaints or claims associated with the purchase of the product or service in particular. In some cases, we will only process the data up to when you decide.

2. Customer Service.

We will process your data for as long as it is necessary to attend to your request or enquiry.

3. Marketing.

We will treat your data until you unsubscribe or cancel your newsletter subscription. If you participate in promotional activities we will keep your data for a period of six (6) months from the end of the action.

4. Usability and quality analysis.

We will treat your data punctually during the time in which let's proceed with a quality action or survey or until we anonymize your navigation data. Regardless of whether we process your data for the time strictly necessary to fulfil the purpose We will subsequently keep them properly stored and protected for as long as responsibilities may arise from the processing, in compliance with the regulations in force at any given time. Once the possible actions in each case are prescribed, we will proceed to the deletion of the personal data.

5. WILL WE SHARE YOUR DATA WITH THIRD PARTIES?

In order to fulfil the purposes indicated in this Privacy Policy, it is necessary for us to give access to your data personal to **third parties** who support us in the services we offer you, namely

- **Financial** entities
- **fraud detection and prevention** entities
- **technology service providers**
- suppliers and partners of **logistics, transport and delivery services**
- providers of services related to **customer care**.
- suppliers and collaborators of services related to **marketing and advertising**

6. WHAT ARE YOUR RIGHTS WHEN YOU PROVIDE US WITH YOUR DATA?

We undertake to respect the confidentiality of your personal data and to guarantee **the exercise of your rights**.

You can exercise these rights **free of charge** by **sending an e-mail to info@menaki.com**, simply by indicating the reason for your request and the right you wish to exercise. In case we consider it necessary to be able to identify you, we may ask you for a copy of a document proving your identity. In particular, regardless of the purpose or legal basis on which we process your data, you are entitled to

- Ask us **for access to the data** we hold about you.
- Ask us **to rectify the data** we already have. In any case, please note that, when actively provide us with your personal data by any means, you guarantee that they are true and accurate and you agree to notify us of any changes or modifications to them. Any loss or damage caused to the Platform or the person in charge of the Platform or any third party on the occasion of a communication of incorrect, inaccurate or incomplete information on the registration forms will be the sole responsibility of the user. Please remember that as a general rule you should only provide us with your own personal data, not of third parties, except as permitted in this Privacy Policy.
- Ask us **to delete your data** to the extent that they are no longer necessary for the purpose for which need to treat them as we have informed you above, or that we no longer have standing to do so.
- Ask us **to limit the processing** of your data, which means that in certain cases you can ask us to temporarily suspend the processing of the data or to keep them beyond the time when you might need it. If you have given us your consent to process your data for any purpose, you also have the right to withdraw it at any time. Some of the ways you can withdraw your consent are explained in the section 2 in which we explain for which purposes we process your data.

When our legitimization for the processing of your data is **your consent** or **the execution of the contract**, as explained in section 3, you will also have the right to request **the portability of your personal data**. This means that you have the right to receive the personal data you have provided in a structured, commonly used and readable format by a machine, in order to be able to transmit it to another entity directly, whenever technically possible.

On the other hand, when the processing of your data is based on **our legitimate interest**, you will also be entitled to oppose the processing of your data.

Finally, we inform you of your right **to lodge a complaint** with the data protection **supervisory authority of relevant data**, in particular before La Agencia Española de Protección de Datos (<https://www.agpd.es/portalwebAGPD/index-ides-idphp.php>)

7. WHAT HAPPENS IF YOU PROVIDE US WITH THIRD PARTY DATA?

We offer functionalities or services that require us to process the personal data of a third party that you provide to us. If you provide us with Personal Data of third parties, you guarantee that you have informed them about the purposes and the in which we need to process your personal data.

8. CHANGES TO THE PRIVACY POLICY

We may change the information contained in this Privacy Policy at any time. At If we do so, we will notify you by various means through the Platform (for example, through a banner, a pop-up or a push notification), or we will even notify you to your email address when the change in privacy, so that you can review the changes, assess them and, if necessary, object to them.

or unsubscribe from any service or functionality. In any case, we suggest that you review this Privacy Policy from time to time in case there are minor changes or we introduce some interactive improvement, taking advantage that always you will find as a permanent point of information on our website.

9. INFORMATION ABOUT COOKIES

We use cookies to facilitate your navigation on the Platform, to know how you interact with Us and, in certain cases, to be able to show you advertising according to your browsing habits. Please read our Cookie Policy to know in more detail the cookies we use, their purpose and other information of interest.