Privacy Policy

Below we inform you about the processing of personal data in connection with the use of our online services.

1. General Information

1.1 Controller

SIAM VITAL SRL
Strada Nerva Traian 27-33
031044, Sector 3, Bukarest
E-Mail: contact@siamvital.com

1.2 Purpose and legal basis of processing

In the course of our business activities, we process personal data of various data subjects (e.g. website users, interested parties, and customers). We will inform you of the purposes and legal basis, as well as further details of the respective processing in order of the different processing situations in the lower part of this privacy policy.

1.3 Recipient

Depending on the respective processing situation, your personal data may be processed not only by the controller but also by third parties. Possible recipients include, in particular, processors (e.g., web hosting providers, software providers, and other technical service providers), shipping service providers, independent providers of services and support, and third-party providers of online services and content. When products are sold via a SIAM VITAL marketplace partner on our website, the data strictly necessary for the transaction will be transmitted to the partner. Data may also be disclosed in connection with official inquiries, court orders, and legal proceedings where necessary for legal prosecution or enforcement. For details, please refer to the notes on the respective processing, if applicable.

1.4 Third country transfers

We use services whose providers are partly located in so-called third countries (outside the European Union or the European Economic Area) or process personal data there. These countries may not offer a level of data protection equivalent to that of the European Union.

Where this is the case and no adequacy decision (Art. 45 GDPR) exists, we have taken appropriate safeguards to ensure an adequate level of data protection, including the EU Standard Contractual Clauses. Where this is not possible, data transfers are based on exceptions under Art. 49 GDPR, in particular your explicit consent or the necessity of the transfer for contract performance or pre-contractual measures.

1.5 Storage duration

Personal data will be kept for as long as is necessary for the purpose for which it was collected, for as long as we are required by law to retain it, or for as long as is necessary for other legal reasons.

1.6 Data subject rights

You have the right to obtain information about the data stored about you, including any recipients and the intended storage period, in accordance with Art. 15 GDPR. If the processed data is not (or is no longer) correct, you have a right to rectification (Art. 16 GDPR). If the relevant legal requirements are met, you may request the deletion (Art. 17 GDPR) or restriction (Art. 18 GDPR) of the processing as well as object to the processing (Art. 21 GDPR). If you believe that the processing of personal data concerning you is in breach of data protection law, you have the right to lodge a complaint with a data protection supervisory authority of your choice (Art. 77 GDPR).

1.7 Right to object

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data which is carried out on the basis of Art. 6 (1) (1) lit. f GDPR. We will then no longer process your personal data unless there are compelling legitimate reasons worthy of protection that outweigh your interest in protection, or the processing serves the assertion, exercising, or defence of legal claims. You may object at any time, without giving reasons, to the processing of your data for the purposes of direct marketing and to any profiling that may be associated with it.

2. Processing situations

2.1 Website use

Our internet offers serve to provide information about our company and our services, to conclude or enter into contractual relationships, and to communicate and interact with our customers and interested parties.

We also process personal data for the aforementioned purposes. The scope and legal basis of the data processing depends on the services requested by the user, the relevant browser configuration, and the scope of any consent given.

Web technologies (cookies and similar technologies)

In order to improve communication and interaction with our customers as well as to optimise the user experience, we use various software solutions and web technologies, including tools for web analysis and marketing

provided by third parties as well as services for the integration of third-party content, such as fonts, maps, or videos.

Analytics tools are used to collect, measure and analyse data points such as visitor numbers, visitor sources, pages visited, time spent on the website, or scroll depth. Marketing tools enable targeted control and evaluation of marketing activities (advertising campaigns, affiliate advertising, multichannel analysis).

This includes functions for storing and displaying recently entered search terms (autofill).

This feature allows us to automatically suggest your previous search queries on our website, making the search function more convenient and efficient for you. You can delete your search history at any time, and a standard deletion occurs automatically after 30 days.

For ePrivacy and data protection reasons, the use of such tools often requires the respective user's consent. We use a so-called consent management tool to obtain and manage the necessary consents in accordance with Art. 6 (1) (1) lit. a GDPR and, if applicable, Section 25 (1) TDDDG (see the following section).

Detailed information about the subject and scope of the relevant consents and the data processing based on them will be provided to you directly via the consent management tool.

Insofar as consent is not required, personal data processing is carried out on the basis of Art. 6 (1) (1) lit. f GDPR for the purposes described, which at the same time represent the interests pursued by us or our partners ("necessary services"). The collection of data for the provision of the website and the storage of log files are absolutely necessary for the operation of the website.

Consent management tool (CMT)

For the purpose of consent management, we use a consent management tool ("CMT"). You can access the CMT at any time here or by clicking on the link "Cookie settings" in the footer of the website. When you access our website, a CMT cookie is set, which is used to store the consent given for the individual services and to control the corresponding activation or deactivation of the respective functionalities.

The CMT is used to obtain the necessary consents and to document them in accordance with our obligation to provide evidence. The legal basis for this is Art. 6 (1) (1) lit. c GDPR.

The collected data is stored until you delete the cookie. Details on data processing by the CMT can be found in the tool’s user interface.

Google tag manager

Our website uses the Google Tag Manager of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. The Tag Manager is used to manage tracking tools and other services, so-called website tags. The Google Tag Manager does not require the use of cookies.

The legal basis is Art. 6 (1) (1) lit. f GDPR, based on our legitimate interest in integrating and managing multiple tags on our website in a straightforward manner

You can find more information here.

Criteo

In the context of shared responsibility within the meaning of Article 26 of the GDPR, we use services provided by Criteo SA, 32 Rue Blanche, 75009 Paris, France ("Criteo") to collect information about user behaviour (e.g. products you have viewed, added to your shopping cart or purchased) in a purely anonymous form in order to improve our advertising offering. Within the framework of the contract with Criteo, we determine the scope of the respective advertising campaign. The implementation of this advertising campaign, including the decision about which ads are delivered where, is then the responsibility of Criteo.

In the context of our joint responsibility for the aforementioned processing, you may exercise your rights under the GDPR against both us and Criteo. We have entered into a shared responsibility agreement with Criteo, the main terms of which we will make available to you on request.

YouTube

We have integrated videos on this website that are stored on YouTube and can be played from our website. We have activated YouTube's extended data protection mode. This means that Google does not receive any usage information and does not set any cookies until the user actively clicks on the play button. After this click, the video starts playing and Google sets its own cookies to improve its services and to play individualised advertising on the Google advertising network.

We also use the YouTube API to display videos and playlists and to record and display the number of video views.

No other user data is processed by the YouTube API client.

The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

For more information, please see the privacy notice applicable to YouTube.

Google maps

Our website incorporates Google Maps, a service provided by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland). Google Maps allows us to visually display geographic information and enhance the usability of our website.

When you access a page on our website containing an embedded Google Map, the following data may be collected by Google:

- Your IP address
- Technical information about your device (e.g., browser type, operating system)
- Information about your interaction with the map (e.g., zoom level, search terms)

Google may process this data to analyse user behaviour and optimise its services. Google may also use cookies to track your interaction with the embedded map.

We embed Google Maps to provide you with an interactive and user-friendly way to locate points of interest relevant to our services.

When you use Google Maps on our website, your data is transferred to Google and may be processed on servers located outside the European Economic Area (EEA). Google is solely responsible for the further processing and use of this data. You can find more information in Google’s Privacy Policy.

The legal basis for the use of Google Maps and the associated transfer of data is your explicit consent in accordance with Art. 6 (1) lit. a GDPR. We only load the Google Maps content after you have given your consent via our CMT.

2.2 Customer management & direct marketing

For the purpose of central management of sales-relevant contact and marketing information within the SIAM VITAL SRL, we use a so-called customer relationship management system ("CRM"). Data managed in CRM includes both existing customer contacts and registered website users, including newsletter subscribers and other marketing contacts.

Customer/User profiles

The CRM enables us to collate and analyse marketing information from multiple sources to optimise our marketing strategy and targeted direct mail. This may include the creation and analysis of customer or user profiles to determine which products and services are most popular and to tailor marketing campaigns to individual interests.

In addition to existing operational customer data, the data generated through our online offerings (e.g. landing pages, contact forms) is also

processed in the CRM. In addition, there may be data from e-mail and social media marketing (e.g. opening rates, referral paths, etc.).

Our aim is to make the sales and marketing efforts of the various business units within the SIAM VITAL SRL efficient and targeted, and to coordinate them across divisions. For this purpose, we process (also with the help of service providers) the relevant CRM data in accordance with Art. 6 (1) (1) lit. f GDPR on the basis of a balancing of interests.

Consent management (e-mail advertising)

Another component of our CRM is consent management. Pursuant to Section 7 (2) No. 1 and 2 UWG, certain direct advertising measures, in particular e-mail or telephone advertising to consumers, are only permitted on the basis of prior express consent.

If and insofar as you give us advertising consent within the scope of our Internet offers (e.g. when registering for the newsletter), we document and store the information required for proof (Art. 7 (1) GDPR and, if applicable, Section 7a UWG) on the basis of Art. 6 (1) (1) lit. c GDPR.

In the event of revocation of consent, we will retain the evidence for documentation purposes pursuant to Art. 6 (1) (1) lit. f GDPR until expiry of the statutory limitation periods. This serves our interest in any legal defence that may be necessary. The same applies to the documentation of advertising objections, which we also store in a blacklist for e-mail delivery to ensure that no advertising is sent to recipients who expressly do not wish to receive it.

(Personalized) Direct Advertising and Newsletter

If consent has been given (e.g. for shopping basket reminders or opinion and satisfaction surveys),data processing for the purposes covered by the consent is carried out on the basis of Art. 6 (1) (1) lit. a GDPR.

Irrespective of any consent requirements, we process personal data from our CRM and, where applicable, from other sources (including service providers) for the purposes of targeted and, where applicable, personalised delivery, and design of direct mail. The legal basis for the processing in pursuit of our advertising interests is Art. 6 (1) (1) lit. f GDPR.

On our website, you have the option of subscribing to a free and regular newsletter, which contains, among other things, information tailored to you, news about our products, and current special offers.

To subscribe to our newsletter, we use the double opt-in process, which means that we will only send you the newsletter by e-mail if you click on a link in our notification e-mail to confirm that you are the owner of the e-mail address provided. If you confirm your e-mail address, we will store your e-mail address, the time of registration, and the IP address used for

registration until you unsubscribe from the newsletter. The sole purpose of the storage is to send you the newsletter and to prove your registration. You can unsubscribe from the newsletter at any time. A corresponding unsubscribe link can be found in every newsletter. Notification to the contact details above or in the newsletter (e.g. by e-mail or letter) is also sufficient.

The legal basis for the processing is your consent pursuant to Art. 6 (1) (1) lit. a GDPR. The logging of the registration process takes place on the basis of our legitimate interests according to Art. 6 (1) (1) lit. f GDPR for the purpose of proving consent.

In order to determine when our e-mails are opened and how they are used, we record and analyse the interactions with the newsletter and the access data (e.g. opening rate or click rate) using standard market technologies. For this purpose, our e-mails include web beacons. These are small image files loaded by our website that allow us to determine when an e-mail has been opened by you. We also learn which of the links in the e-mail you click on. We use this access data to continually improve our services, content, customer communications, and for statistical purposes. We also use this information to better understand what content and products interest you so that we can provide you with the most relevant content in the future.

As part of your registration to receive our promotional e-mails, we also ask for your consent to personalise our e-mails to your needs and interests based on the data we store about you across devices, such as your access data, account information if applicable, and your shopping history (orders, returns, unfinished orders). The legal basis for this is your consent in accordance with Art. 6 (1) (1) lit. a GDPR.

The access data (opening and click data) are only stored anonymously. A separate revocation regarding the described analysis of your access data and the creation of a personalised usage profile is not possible. However, you can configure your e-mail program to display e-mails in text format rather than HTML. This prevents image and graphics files from being displayed, so that tracking is not possible. In this case, the newsletter will not be displayed in its entirety and you may not be able to use all of its features. If you do not want us to analyse your access data or create a personalised usage profile of you, you can withdraw your consent to receive personalised e-mail advertising at any time as described above.

Existing customer advertising

Please note that consent for mailing and tracking is not required for postal advertising and existing customer advertising by e-mail under the conditions of Section 7 (3) UWG. Data processing on the basis of legitimate interest pursuant to Art. 6 (1) (1) lit. f GDPR may therefore also take place in connection with e-mail marketing and postal advertising if you have not given your consent to advertising or have revoked any

consent given to us. You may object to the use of your data for advertising purposes on the basis of our legitimate interest at any time by using the corresponding link in the e-mails or by notifying us at the above contact details (e.g. by e-mail or letter) without incurring any costs other than the transmission costs according to the basic rates.

Contact via SMS and telephone by SIAM VITAL

Provided you have given your consent and have entered your mobile number and/or telephone number in your customer account, we will contact you by phone or SMS for satisfaction surveys, special offers and promotions, to inform you about products and statistical purposes. You can revoke your consent at any time with effect for the future by notifying the above contact details (e.g. by e-mail or letter).

If you give us your consent at the beginning of the call, we will then record the conversation. We will store the information provided during the call for the training of our customer service staff and for the quality assurance of our call centre and will normally delete it after three months unless a longer retention period is required by law or for evidence purposes. We may retain the recording for up to three years for evidence purposes (e.g. conclusion of a sales contract). Your consent is the legal basis (Art. 6 (1) (1) lit. a GDPR) for the recording of the conversation and its evaluation.

Surveys and competitions

If you participate in one of our surveys, we will use your data for market and opinion research. We do anonymised analysis of the data for internal purposes only. If, in exceptional cases, surveys are not evaluated anonymously, the data will only be collected and processed with your consent (Art. 6 (1) (1) lit. a GDPR).

For selected customer surveys, we use tools from Qualtrics, LLC, 333 W River Park Drive, Provo, Utah 84604, USA. If personal data is transferred to third countries in accordance with the GDPR in this context, we ensure an adequate level of data protection through appropriate measures in accordance with Art. 5 of the GDPR. Further information on the provider's data protection can be found at https://www.qualtrics.com/privacy-statement/.

In the context of competitions, we use your data for the purpose of conducting the competition and for prize notification. More detailed information can be found in the terms and conditions of the relevant competition. The legal basis for the processing is the competition contract pursuant to Art. 6 (1) (1) lit. b GDPR.

Reviews and rating system

We offer the opportunity to provide public reviews of our products and services on our websites. When you participate in the star rating system, we calculate an overall score using our feedback scale. In the case of the

comment function, your review may also be published on our websites only with your initials or a name (pseudonym) freely chosen by you.

The processing is carried out on the basis of Art. 6 (1) (1) lit. f GDPR with the legitimate interest of obtaining user ratings and thus creating a basis of trust for the use of the website. We also have a legitimate interest in making our sales reports transparent to other customers and verifying that they are based on actual purchases.

2.3 Contact

If you contact us via our contact forms or by e-mail, we regularly process your personal data (also with the help of service providers) in order to respond to your enquiry or to process your request on the basis of Art. 6 (1) (1) lit. f GDPR, to protect the fundamental interests of our business, in particular our corporate communications.

Contract-related communication which is necessary for the implementation of a contractual relationship concluded with you or within the scope of pre-contractual measures based on your enquiry is also carried out on the basis of Art. 6 (1) (1) lit. b GDPR.

You can also contact us by telephone. If you give us your consent at the beginning of the call, we will record the conversation. We will store the information provided during the call for the training of our customer service staff and for the quality assurance of our call centre and will normally delete it after three months unless a longer retention period is required by law or for evidence purposes. We may retain the recording for up to three years for evidence purposes (e.g. conclusion of a sales contract). Your consent is the legal basis (Art. 6 (1) (1) lit. a GDPR) for the recording of the conversation and its evaluation.

2.4 Customer account

On our website, we offer users the opportunity to create a customer account or register for our login area in order to use the full functionality of our website. Registration for a user account constitutes a contract for the use of an account for the SIAM VITAL shop. The data collected is used to grant the user access to the platforms and their services. We have highlighted the information you must enter by marking it as mandatory. The registration information is used to process orders in our online shop and to create a customer account. Registration is not possible without this information. The legal basis for the processing is Art. 6 (1) (1) lit. b GDPR.

We only use the information you provide for the creation of a member account and an individual profile. The data will be deleted as soon as it is no longer required for the purpose for which it was collected, unless a longer retention period is required to comply with legal obligations.

2.5 Order process

If you place an order, we may collect information in addition to that provided during registration that is necessary to process the order. If you purchase products from our website through an SIAM VITAL Marketplace partner, the data that is strictly necessary for the transaction will be transmitted to that partner.

You may provide optional details such as telephone and fax numbers so that we can contact you by these means in the event of queries or to request payment by telephone in the event of non-payment after the due date and written reminder, if this is necessary and we cannot contact you by other means.

The legal basis for the processing is Art. 6 (1) (1) lit. b GDPR.

2.6 Payment service providers

You can choose from a variety of payment service providers and payment methods to make your payment, including prepayment, PayPal, and invoice. For this purpose, data directly related to payment processing, such as billing addresses, IBAN, BIC and preferred payment method, may be transmitted to these service providers. For the purpose of verifying payments, e.g. for the release of purchased goods, we receive corresponding payment information from the payment service providers. We also receive master data and financial information from payment service providers as part of any identity check required by law.

Unless you have given us your consent in accordance with Art. 6 (1) (1) lit. a GDPR, the legal basis for the transfer of data to the payment service providers in the context of contract processing is Art. 6 (1) (1) lit. b GDPR, as the processing is necessary for the execution of the contract and the processing of the order.

For the legal basis and further details of the data processing carried out by the payment service providers under their own responsibility, please refer to the data protection information of the respective payment service provider. Please note that not all payment methods may not be available in all countries.

- Stripe Technology Company Limited (STC) Europe, 1 Wilton Park, Wilton Place, Dublin 2, D02 FX04, Ireland: Privacy Policy

Please note that the most effective way to enforce your privacy rights is to contact your Payment Service Provider, as only they have access to the data and can take direct action.

2.7 Sanctions comparison

In order to comply with our obligations under EU anti-terrorism legislation, we cross-check against the sanctions lists maintained and published by the EU. The legal basis is Art. 6 (1) (1) lit. c GDPR as well as our legitimate

interest pursuant to Art. 6 (1) (1) lit. f GDPR in checking whether the business relationship violates Section 134 BGB and in avoiding sanctions.

We do this by checking your name and delivery address against the latest sanctions lists when you place an order. If there is a positive match, we verify the result manually. If the manual check does not lead to a clear negative result, we will contact you and, if necessary, request further information from you for matching purposes (in particular a copy of your ID showing your nationality, date of birth and place of birth). We will delete copies of ID cards immediately after manual verification. During the check, your order will be temporarily placed on hold. If the result of the check is negative, the order will continue to be processed. If the result of the check is a match with a sanctions list entry, we will notify you and give you the opportunity to comment. We will then decide whether or not to establish or continue a business relationship with you.

3. Social Media Presence

Users' data is usually processed by the social networks concerned for market research and advertising purposes. In this way, usage profiles can be created based on users' interests. For this purpose, cookies and other identifiers are stored on the users' computers. Based on these usage profiles, advertisements are then placed, for example, within the social networks, but also on third-party websites. As part of the operation of our online presences, we may have access to information such as statistics on the use of our online presences provided by the social networks. These statistics are aggregated and may include, in particular, demographic information and data on interaction with our online presences and the posts and content distributed through them. Details and links to the social network data to which we have access as the operator of the online presence can be found in the list below.

The legal basis for data processing is Art. 6 (1) (1) lit. f GDPR, based on our legitimate interest in effectively informing and communicating with users, or Art. 6 (1) (1) lit. b GDPR, in order to stay in contact with and inform our customers and to carry out pre-contractual measures with future customers and interested parties.

For the legal basis of the data processing carried out by the social networks under their own responsibility, please refer to the data protection information of the respective social network. The following links will also provide you with further information about the respective data processing and the options to object.

We would like to point out that the most effective way to address privacy concerns is to contact the social network provider, as only they have access to the data and can take direct action.

Below is a list of information about the social networks on which we have an online presence:

- Facebook (Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland)
    - Operation of the Facebook fan page under joint responsibility on the basis of an Agreement on joint processing of personal data (so-called Page Insights Supplement regarding the responsible party);

      Information on the processed site insights data and the contact option in the event of data protection enquiries: https://www.facebook.com/legal/terms/information_about_page_insights_data;
    - Privacy Policy: https://www.facebook.com/about/privacy/;
    - Opt-Out: https://www.facebook.com/settings?tab=ads and https://www.youronlinechoices.com.
- Instagram (Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland)
    - Privacy policy: https://help.instagram.com/519522125107875
- Google/YouTube (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland)
    - Privacy Policy: https://policies.google.com/privacy;
    - Opt-Out: https://www.google.com/settings/ads

4. Data Protection Officer

You can contact our Data Protection Officer at:

Data Protection Officer
c/o SIAM VITAL SRL
Strada Nerva Traian 27-33
031044, Sector 3, Bukarest
Email: contact@siamvital.com

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