

GDPR Compliance Document for

WE<3DEKO

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1.1 Identity of the Data Controller

WE<3DEKO Amtsgasse 3/4 7021 Draßburg Austria Email:
nemeth.marcell@welove3ddeko.at Phone: +43 664 99390912

WE<3DEKO (hereinafter "we" or "us") is the data controller responsible for the processing of your personal data as described in this GDPR Compliance Document.

1.2 Contact Person for Data Protection

For any questions regarding data protection, you can contact our data protection contact person at the above-mentioned contact details.

2.1 Appointment of a Data Protection Officer

As a small business, WE<3DEKO is generally not required to appoint a dedicated Data Protection Officer (DPO) under Article 37 of the GDPR, unless our core activities involve large-scale processing of special categories of data or data relating to criminal convictions and offences, or large-scale, regular and systematic monitoring of data subjects. Currently, our processing activities do not meet these criteria.

2.2 Contact for Data Protection Matters

Nevertheless, we take data protection seriously. For all data protection-related inquiries, concerns, or requests, you may contact us directly via the contact information provided in Section 1.1. We are committed to addressing your data protection needs promptly and effectively.

3.1 Lawfulness, Fairness, and Transparency

We process personal data lawfully, fairly, and in a transparent manner in relation to the data subject.

3.2 Purpose Limitation

We collect personal data for specified, explicit, and legitimate purposes and do not further process it in a manner that is incompatible with those purposes.

3.3 Data Minimization

We ensure that personal data collected is adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

3.4 Accuracy

We take every reasonable step to ensure that personal data is accurate and, where necessary, kept up to date. Inaccurate personal data is erased or rectified without delay.

3.5 Storage Limitation

We keep personal data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

3.6 Integrity and Confidentiality

We process personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures.

3.7 Accountability

We are responsible for, and able to demonstrate compliance with, the principles outlined above.

4.1 Types of Data Collected

We may collect and process various types of personal data, depending on your interaction with us. This includes:

- **Contact Information:** Name, address, email address, phone number, and other similar contact data.
- **Order Data:** Details about the products you purchase, including custom order specifications, payment information (though we do not store full payment card details), and delivery addresses.

- **Communication Data:** Information you provide when you communicate with us, such as inquiries, feedback, or support requests.
- **Technical Data:** Information about your device and how you interact with our website, such as IP address, browser type, operating system, and browsing activity. This is primarily collected through cookies and similar technologies (see Section 9).

4.2 Purposes of Processing

We process your personal data for the following purposes:

- **Order Fulfillment:** To process and fulfill your orders, including manufacturing custom products, arranging delivery, and managing payments.
- **Customer Service:** To respond to your inquiries, provide support, and manage your requests.
- **Communication:** To send you order confirmations, shipping updates, and other transactional communications. With your consent, we may also send you marketing communications about our products and services.
- **Website Improvement:** To analyze website usage and improve the functionality and user experience of our online presence.
- **Legal Compliance:** To comply with legal obligations, such as tax and accounting requirements, and to prevent fraud.
- **Marketing (with consent):** To send you newsletters, promotional offers, and information about new products or services that may be of interest to you, where you have explicitly consented to receive such communications.

5.1 Consent (Art. 6 para. 1 lit. a GDPR)

We process your personal data based on your explicit consent for specific purposes, such as sending marketing communications. You have the right to withdraw your consent at any time, which will not affect the lawfulness of processing based on consent before its withdrawal.

5.2 Performance of a Contract (Art. 6 para. 1 lit. b GDPR)

We process your personal data where it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract. This includes processing your data to fulfill your orders, manage payments, and arrange delivery.

5.3 Legal Obligation (Art. 6 para. 1 lit. c GDPR)

We process your personal data where it is necessary for compliance with a legal obligation to which we are subject, such as tax and accounting laws.

5.4 Legitimate Interests (Art. 6 para. 1 lit. f GDPR)

We may process your personal data where it is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms. Our legitimate interests include improving our website, preventing fraud, and ensuring the security of our systems.

6.1 Retention Period

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

6.2 Specific Retention Periods

- **Order and Financial Data:** We retain data related to orders and financial transactions for a minimum of 7 years, as required by Austrian tax and accounting laws.
- **Customer Service Communications:** We retain customer service communications for a period necessary to resolve inquiries and maintain a record of our interactions, typically up to 3 years after the last interaction.

- **Marketing Consent:** If you have consented to receive marketing communications, we will retain your contact details for marketing purposes until you withdraw your consent or object to such processing.
- **Technical Data (Cookies):** Retention periods for data collected via cookies vary depending on the cookie type (session vs. persistent) and their purpose. Details are provided in our Cookie Policy (see Section 9).

6.3 Deletion of Data

Once the retention period expires, your personal data will be securely deleted or anonymized. If data cannot be deleted for technical or legal reasons, it will be isolated and protected from further processing.

7.1 Right of Access (Art. 15 GDPR)

You have the right to obtain confirmation as to whether or not personal data concerning you is being processed, and, where that is the case, access to the personal data and certain information.

7.2 Right to Rectification (Art. 16 GDPR)

You have the right to obtain the rectification of inaccurate personal data concerning you and to have incomplete personal data completed.

7.3 Right to Erasure ('Right to be Forgotten') (Art. 17 GDPR)

You have the right to obtain the erasure of personal data concerning you without undue delay under certain conditions (e.g., if the data is no longer necessary for the purposes for which it was collected).

7.4 Right to Restriction of Processing (Art. 18 GDPR)

You have the right to obtain restriction of processing under certain conditions (e.g., if you contest the accuracy of the data, for a period enabling us to verify the accuracy).

7.5 Right to Data Portability (Art. 20 GDPR)

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us, where technically feasible.

7.6 Right to Object (Art. 21 GDPR)

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on legitimate interests or for the performance of a task carried out in the public interest or in the exercise of official authority. You also have the right to object at any time to processing of personal data for direct marketing purposes.

7.7 Right to Lodge a Complaint with a Supervisory Authority (Art. 77 GDPR)

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

7.8 Right to Withdraw Consent (Art. 7 para. 3 GDPR)

Where processing is based on consent, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

7.9 Exercising Your Rights

To exercise any of these rights, please contact us using the contact information provided in Section 1.1. We will respond to your request in accordance with applicable data protection laws.

8.1 Measures to Ensure Data Security

We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including:

- **Pseudonymization and Encryption:** Where feasible, we pseudonymize and encrypt personal data to reduce its direct identifiability.
- **Confidentiality:** We ensure the ongoing confidentiality, integrity, availability, and resilience of processing systems and services.
- **Restoration:** In the event of a physical or technical incident, we have the ability to restore the availability and access to personal data in a timely manner.
- **Regular Testing:** We implement a process for regularly testing, assessing, and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing.
- **Access Control:** Access to personal data is restricted to authorized personnel who have a legitimate need to know for the purposes of fulfilling their job responsibilities.
- **Physical Security:** We implement measures to protect physical access to systems where personal data is stored.

8.2 Data Breach Notification

In the event of a personal data breach, we will assess the risk to individuals' rights and freedoms and, where appropriate, notify the competent supervisory authority without undue delay and, where feasible, not later than 72 hours after having become aware of it, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. If the breach is likely to result in a high risk to your rights and freedoms, we will communicate the personal data breach to you without undue delay.

9.1 Use of Cookies

We use cookies and similar tracking technologies on our website to enhance your browsing experience, analyze site traffic, and personalize content. Cookies are small text files stored on your device when you visit a website. They help us remember your preferences, understand how you interact with our site, and provide relevant advertisements.

9.2 Types of Cookies Used

- **Strictly Necessary Cookies:** These cookies are essential for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms.
- **Performance Cookies:** These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site.
- **Functionality Cookies:** These cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third-party providers whose services we have added to our pages.
- **Targeting Cookies:** These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites.

9.3 Managing Cookies

You have the right to decide whether to accept or reject cookies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

9.4 Third-Party Technologies

We may also use third-party services that utilize cookies and other tracking technologies. These third parties have their own privacy policies governing the use of your information. We encourage you to review their policies for more information.

10.1 Transfers Outside the EU/EEA

We generally process personal data within the European Union (EU) and the European Economic Area (EEA). In some cases, personal data may be transferred to countries outside the EU/EEA (third countries) if necessary for the purposes described in this document, for example, when using service providers located in third countries.

10.2 Safeguards for International Transfers

When transferring personal data to third countries, we ensure that appropriate safeguards are in place to protect your data, as required by the GDPR. These safeguards may include:

- **Adequacy Decisions:** Transfers to countries that have been deemed to provide an adequate level of data protection by the European Commission.
- **Standard Contractual Clauses (SCCs):** Implementing Standard Contractual Clauses adopted by the European Commission, which provide appropriate safeguards for the transfer of personal data.
- **Binding Corporate Rules (BCRs):** For transfers within a group of undertakings or enterprises, we may rely on Binding Corporate Rules approved by competent supervisory authorities.
- **Explicit Consent:** In specific situations, we may transfer data based on your explicit consent, after you have been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards.

We ensure that any third-party service providers involved in such transfers are also committed to upholding GDPR standards and have implemented appropriate security measures.

11.1 Updates to the Privacy Policy

We may update this GDPR Compliance Document from time to time to reflect changes in our data processing practices or legal requirements. We will notify you of any significant changes by posting the updated policy on our website or by other appropriate communication channels.

11.2 Reviewing the Policy

We encourage you to review this document periodically to stay informed about how we are protecting your information. The date of the last revision will be indicated at the top of the document.