

Principles on the protection of personal data

The company "TehnikaConsulting SRL, 26 Podului Street, 525200 Covasna, Covasna County, Romania, Trade Register No. J14/410/2019, unique code 41322194", (from now on, „The Company”), owner of the website (online store) <https://www.locprod.com>, declares that all personal data (hereinafter, "data") are considered strictly confidential and are treated in accordance with the laws in force in the field of personal data protection.

The security of your personal data is a priority for us. Consequently, we pay the utmost attention to personal data and their protection. As part of these Principles of Personal Data Processing ("Principles"), we want to inform you of what personal data we collect about you and how we continue to use it.

1. Personal data and their processing

1.1. Categories of personal data

We collect various information, depending on which services in our offer you choose to use.

If you buy from us, we collect:

- Name and contact details: Name and surname, e-mail address, postal address, billing address, telephone number and bank details regarding invoicing, payment information.
- Demographic data: Information on gender, date of birth, country and preferred language.
- Data that appear during the existence of the contract - products purchased, customer segment, volume of services provided
- Authentication data: Username and password. We do not have access to the password itself.

If you subscribe to our marketing messages, we collect:

- Name and contact details - e-mail address and first name.
- Demographic data - country, sex information.

In addition, we process the following personal data:

- Details from the messages between the Company and the customer
- Recordings of cameras in the Company's locations
- Records of behavior on Web pages managed by the Company

1.2. Purpose of processing personal data

- **Providing and improving services.** In order to be able to provide and improve the services offered to your satisfaction, we process your personal data. Specifically, they include:
 - ✓ **Processing orders for products or services**, ordered either through our website, or through the mobile application, or through the telephone line for customers. Here, the legal reason is that the data are indispensable for the execution of the purchase process, and some information is indispensable for the fulfillment of the legal obligations (for example, the accounting documents).
 - ✓ **Product availability notification.** If you request to monitor the availability of an item, we process your personal data based on your consent.

- ✓ **Customer support service.** In order to provide services to customers and eliminate any problems in the execution of the purchase-sale process, we process personal data based on the need to comply with these contracts.
- ✓ **Communication.** We use the data collected for the purpose of communicating with you in a personalized manner. For example, we may contact you by phone, e-mail, or other means to remind you that you have products in your online shopping cart, to help you complete your order, to communicate your current order status, of your order or complaint to obtain additional information, if any, or to notify you that you need to take action to keep your account active. If you purchase from us as a member, we process this data out of a legitimate interest arising out of the legitimate interest of the Company, as described above.
- ✓ **Improving services.** We use the data to continually improve our services and systems, including adding new features and making informed decisions, using total analysis and business intelligence, all based on our legitimate interest in business freedom and the need to improve the services provided, in order to maintain competitiveness. In order to ensure the adequate protection of your rights and interests, in order to improve the services we will use personal data as anonymized as possible.
- **Protection, security and dispute resolution.** We may also process data out of a legitimate interest, which is to ensure the protection and security of our systems and customers, to prevent and detect fraud, resolve disputes and implement our agreements, based on the legitimate interest.
- **Camera recordings.** The company places cameras in the owned spaces, in order to protect its legitimate interests. Areas where cameras are located are always marked with a warning.
- **Marketing offers.**
 - ✓ Commercial communications
 - We send you commercial communications regarding products similar to those purchased.
 - You can always refuse these commercial communications by using the unsubscribe link in each email.
 - In case of unsubscribing from commercial messages, we will no longer use your electronic contact data for these purposes. We will only resume using them if you sign up or expressly request them.
 - ✓ The displayed marketing offers may be selected on the basis of other information acquired about you over time, based on contact information, demographic information, favorite products and data on the use of products and our website (cookies, IP address, information provided by your browser, clicks, commercial messages displayed, products visited). Processing is not fully automated, as it would have legal effects for you.
 - ✓ If you buy from us as a member, we process this data due to a legitimate interest arising from legitimate conventional marketing.
 - ✓ If you are not our customer, we process the data based on your consent.
 - ✓ You have the right to object at any time and free of charge to such processing. Contact details are provided at the end of this document.
- Processing of **cookies from the Web** pages operated by the Company
 - ✓ If you enable cookies in your browser, we process behavioral records from cookies placed on the website operated by the Company, in order to ensure better functionality of the website and for the purposes of Internet advertising of the Company. You can find more information in a separate chapter of this document.

1.3. Transfer of personal data to third parties

Your personal information will be passed on to third parties or otherwise mediated only if it is necessary for the performance of the buying and selling process, on the basis of a legitimate interest or if you have previously given your consent.

- a) subsidiaries and processing companies, in order to fulfill the purchase-sale process, in order to execute the internal processes and practices
- b) credit card companies, payment service providers for payment processing and banks, based on your order, in order to execute the purchase-sale process
- c) transport companies, for the purpose of delivering the products or services ordered by you and resolving complaints, including termination of the contract
- d) our partners in the loyalty programs you opt for
- e) other service providers, third parties involved in data processing;
- f) third parties, for example prosecutors and courts, for the purpose of recovering or concluding any contract with you;
- g) public authorities (eg police)
- h) third parties conducting surveys among customers

If a third party uses the data in the context of its legitimate interest, the administrator does not assume this responsibility. This process is governed by the principles of personal data processing of companies and relevant persons.

2. Customer account and purchase without registration

a) The customer account is password protected. In your customer account you have access to your own data, including editing it, you can view the data on completed and incomplete orders and you can change the sending of newsletters. Through the customer account, you can manage both personal data and the sending of newsletters.

b) If you do not want to create a customer account for shopping, you can buy directly in the E-shop, without registration, without being a member.

3. Security of personal data and duration of their storage

3.1. Security of personal data

- a. Your data is transmitted in encrypted form. We will use the SSL (secure socket layer) encryption system. We secure our website and other systems by means of technical and organizational measures against the loss and destruction of your data, against access to, modification or dissemination by unauthorized persons.
- b. We ask the data processors we work with to prove the concordance of their systems with the GDPR regulation.
- c. Access to your customer account is only possible after entering your personal password. In this context, we would like to warn you that it is absolutely necessary not to disclose your access data to third parties and, after logging in to your client account, to always close the browser window, especially if share your computer with other users. The Company does not assume responsibility for any abuse of passwords used, unless the situation was caused directly by the Company.

3.2. Processing time

We process and store personal data:

- for an absolutely necessary period to ensure all the rights and obligations resulting from the sales contract
- for 1 year after the end of the warranty period, in order to resolve possible disputes
- as long as the Company, as administrator, is obliged to keep the information, in accordance with the general legal regulations. The accounting documents, for example the invoices issued by the Company, are archived according to the law, for a period of 10 years from their issuance.
- The agreement for the notification of the availability of goods remains in force for the duration of the availability of the information sent, but not more than a period of 1 year or until its revocation.
- The agreement on marketing offers is valid for 4 years or until its revocation
- The recordings of the cameras in the Company's locations and in the immediate proximity of the Company's buildings are processed for a period of 20 days from the date of the CCTV recording.
- Communication 2 years

In other cases, the processing time arises for the purpose of processing or is dictated by the regulations on the protection of personal data.

4. The rights of data subjects

- a. If we process your personal data, you can request free information about the processing of your personal data.
- b. If you believe that the processing of personal data does not respect the protection of your personal data and contravenes the legal regulations on the protection of personal data, you can ask for explanations, request the removal of the situation and, in particular, request correction, completion, deletion or blocking of personal data.
- c. If you wish to exercise your rights, please contact the Data Protection Officer at szilard.varga@outlook.com. You can also contact the National Authority for the Supervision of Personal Data Processing.
- d. Your consent to the processing of personal data may be revoked at any time. If you withdraw your consent to the processing of personal data, it will be deleted or anonymized; however, these measures do not affect the personal data necessary for the Company to fulfill its legal obligations (eg the execution of orders already taken) or to protect its legitimate interests. The deletion of personal data also takes place when it is not necessary for the intended purpose or if the storage of your data is inadmissible, for other reasons provided by law.

5. Web pages

5.1. Cookie

Our pages use so-called cookies, so that our offer is relevant, interesting and pleasant for you. Cookies are small text files, stored on your computer or smartphone or other device and used by your web browser. More information about cookies can be found [here](#). We use cookies for purposes such as:

- the correct functionality of the shopping cart, in order to complete the order as simply as possible
- remembering the connection data so that it does not need to be entered repeatedly
- the best possible personalization of our web pages, according to your requirements, by monitoring your visits, your movement on the site and the functions used
- monitor the ads you see so that you won't see in the future ads for products that don't interest you

Some cookies may collect information that is subsequently used by third parties and that, for example, directly supports our promotional activities (the so-called "third party cookies"). For example, information about products purchased on our site may be provided to an advertising agency in order to view and personalize the advertising banners on the Internet that appear on the sites you are viewing. Please note that it is not possible to identify you based on this data.

5.2. Use of cookies

The cookies used on our site can be classified into two categories. The short ones, the so-called "session cookies", are deleted as soon as you leave our website. Long-lasting, so-called "persistent cookies" remain stored on your device for much longer or until you delete them manually (the persistence of cookies on your device depends on their setting and your browser settings.).

Cookies can also be classified by functionality:

- analytics, which helps us to improve the comfort of users on our site, since we can understand how users use it
- conversion, which allow us to analyze the performance of various sales channels
- tracking, which, in combination with conversion, helps to analyze the performance of various sales channels
- remarketing, used to customize the content of ads and target them correctly
- essential, important for the basic functionality of the site

5.3. Refusal of cookies

The cookie usage setting is included in your Internet browser. By default, most browsers automatically accept cookies. With the help of the browser, you can refuse these cookies or reduce them to certain types, which you select specially.

Information about browsers and setting cookie preferences can be found on the following web pages or in other web browser files:

- [Edge](#)
- [Chrome](#)
- [Firefox](#)
- [Internet Explorer](#)
- [Safari](#)

An effective tool for managing cookies is also available on the website <https://www.youronlinechoices.com/uk/>

5.4. Links

Our site contains links to other websites that are practical and contain useful information. Please note that these sites may be owned and operated by other companies and organizations, which may have other security and personal data protection policies. Our company has no control over the information, materials, products or services included or accessible through these web pages and assumes no responsibility for them.

6. Contact Us

If you have any questions, comments or requests regarding these Principles, please contact us:

Data Protection Officer: szilard.varga@outlook.com

Contact: SC TehnikaConsulting SRL, str. Podului no. 26, 525200 Covasna, Covasna County, RO

Customer service: office@tehnikaconsulting.ro

7. Validity

These Principles on the protection of personal data are valid starting from June 1st, 2020.