# **Privacy Policy**

Della Spina OÜ, Katusepapi tn 4, 11412 Tallinn, Estonia, registration number 14387497 ("us", "we", "Della Spina" or "our") operates the www.dellaspina.si website (the "Service") and is the controller of the data.

Everything we do is line with our Privacy policy and General Terms which are in line with Estonian and European regulations. By using our website you are agreeing to this policy and the use of cookies, as detailed in this policy.

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data. We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from <a href="https://www.dellaspina.si">www.dellaspina.si</a>.

#### Information Collection And Use

We collect several different types of information for various purposes to provide and improve our Service to you.

## **Types of Data Collected**

#### **Personal Data**

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- · First name and last name
- · Phone number
- Address, State, Province, Postal code, City, Country
- · Cookies and Usage Data
- · Eyesight prescription and pupil distance
- Payment details

## **Usage Data**

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

## **Transactional data**

Transaction data, in that personal data, can be transferred for the benefit of Stripe Payments Europe, Limited located in 1 Grand Canal Street Lower Grand Canal Dock Dublin D02 H210 Ireland, on the terms that it will beneficial on in service connected to order payments. A client has the right to see the content of his data and any corrections made to it. Sharing of information is voluntary, however, at the same time it is crucial to using this site.

## **Tracking & Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service. Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Service.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

## **Use of Data**

Della Spina OU uses the collected data for various purposes:

- To provide and maintain the Service
- To notify you about changes to our Service
- · To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer care and support
- To provide analysis or valuable information so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues

## **Transfer Of Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction, but always within the European Union.

If you are located outside Estonia and choose to provide information to us, please note that we transfer the data, including Personal Data, to Estonia and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer. Della Spina OU will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

## **Disclosure Of Data**

## Legal Requirements

Della Spina OU may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Della Spina OU
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

## **Security Of Data**

We protect your personal data from any form of unauthorised sharing, copying and taking by unauthorised personnel, processing in disregard to clauses, and changing, loss, defecting or destroying of data. The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to

use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

#### Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used. These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

#### **Processing**

We use this services in order to run our business.

#### Odoo

Odoo is run by Odoo S.A., a company headquatered in Chaussee de Namur, 40 Grand-Rosiere, 1367 Belgium. We use their ERP in order to organise and run our internal processes.

#### Brevo

We use Brevo to send email. They are operated by the company SENDINBLUE, located at 106 boulevard Haussmann, 75008 Paris, France, VAT id: FR80498019298.

## **Analytics**

We may use third-party Service Providers to monitor and analyse the use of our Service.

#### Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: https://policies.google.com/privacy?hl=en

Hotjar - We use Hotjar in order to better understand our users' needs and to optimise this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behaviour and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our

website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on anindividual user. For further details, please see Hotjar's privacy policy by clicking on this link.

You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites by following this <a href="https://example.com/opt-out/block/">opt-out/block/</a> ink.

 Facebook conversion pixels - We use the "Custom Audience pixel" of Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook") on our website. With its help, we can keep track of what users do after they see or click on a Facebook advertisement. This enables us to monitor the effectiveness of Facebook ads for purposes of statistics and market research. Data collected in this way is anonymous to

us, which means we cannot see the personal data of individual users. However, this data is saved and processed by Facebook. Facebook can connect this data with your Facebook account and use it for its own advertising purposes, in accordance with Facebook's Data Policy which can be found at https://www.facebook.com/about/privacy/. You can

allow Facebook and its partners to place ads on and outside of

Facebook. A cookie can also be saved on your device for these purposes. Please click here if you would like to withdraw your consent https://www.facebook.com/settings/? tab=ads# =

- YouCanBookMe We use YouCanBookMe to offer a simple and user friendly way for our
  customers to book eye exams. YouCanBookMe Limited is a British company based in
  Bedford Heights, Brickhill Drive, Bedford, Bedfordshire, England, MK41 7PH, UK and is
  fully GDPR compliant. They store and process our customers names, their phone numbers
  and emails.
- Make.com We use their services to automate part of the flow for ordering of contact lenses. The company Celonis GmbH which is running the service is based in Theresienstrasse 6, Munich, Bayern, 80333, Germany and is fully GDPR compliant.
- **Airtable** We use their services to automate part of the flow for ordering of contact lenses. The company Formagrid Inc which is running the service is based in 799 Market Street, 8th Floor San Francisco, CA 94103, USA and is fully GDPR compliant.

#### **Links To Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **Children's Privacy**

Our Service does not address anyone under the age of 16 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 16. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

## Rights of clients

A client has the right to decline the right to processing his data in the manner we wrote above. If that is the case please stop using our website and get in touch with us. You also have the right of access, rectification or erasure, restriction of processing and data portability.

# **Changes To This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

# **Contact Us**

If you have any questions about this Privacy Policy, please contact us:
• By email: info@dellaspina.si

The Privacy Policy was last edited in April 2024.