

# Personal Data Protection

## Personal Data Protection Rules

Within related services, the operator hereby announces the personal data protection rules on the website [www.sexuallytoys.com](http://www.sexuallytoys.com) regulating administration of data on users of websites and users of services available on the websites (hereinafter referred to as "data protection, data management principles and data administration").

Within the personal data protection, the data administrator informs the website users of personal data rules, procedures, principles and manipulation, as well as method and possibilities of application of rights of affected persons.

The data administration undertakes to observe and meet all requirements defined in these Rules and valid legislation related to its activity.

The Personal Data Protection Rules are permanently available on [www.sexuallytoys.com](http://www.sexuallytoys.com).

If you have any additional questions related to the personal data protection not included in these Rules, write to: **[administration@sexuallytoys.com](mailto:administration@sexuallytoys.com)** and our worker will answer your questions.

We would like to inform you that if the data provider (buyer) does not provide you own personal data, he is obliged to obtain an approval of the respective person.

**When using the website [www.sexuallytoys.com](http://www.sexuallytoys.com), you accept and agree with the Personal Data Protection Rules and their processing on the basis of the below mentioned points.**

### 1. Definitions

**a) "Data administrator"** means a natural person or legal entity, a public authority, agency or any other body defining a purpose and means of personal data processing individually or with other persons, if data administration objectives and means are delimited by EU legislation or national legislation. Data administrator or special aspects of specification of the data administrator can be delimited also by the EU legislation or national legislation.

**b) "Personal data"** means any information related to identified or identifiable natural person (hereinafter referred to as "affected person", "regular customer") who directly or indirectly, mainly on the basis of an identifier, such as your name, number, localisation data, online identifier, or for one or more factors related to physical, physiological, genetic, mental, economic, cultural or social identity of an individual.

**c) "Data processing"** means any operation or set of operations made with personal data or set of automated or non-automated means, such as collection, recording, organisation, distribution, storage, modifications or changes, use, transfer, distribution of responsibilities or accessing in any other way, harmonisation or connection, limitation, deleting or destroy.

**d) "Personal data processing limitations"** means limiting of use of saved personal data with the aim to limit their use also in future.

**e) "Profiling"** means any form of automatic personal data processing, at which the personal data are used for evaluation of certain personal characteristics connected with the natural person, in particular work performance, economic status, state of health, personal preferences, interest, reliability, behaviour, analyse or predict movement, stay and related functions.

**f) "Processor"** means a natural person or legal entity, a public authority, agency or any other body administering personal data in the name of the data administrator.

**g) "Recipient"** means a natural person or legal entity, a public authority, agency or any other body, to which personal data are provided, either it is a third party or not. The public authorities with an access to personal data within an individual investigation in line with EU legislation or national legislation are not considered the recipients. Administration of these data by these public authorities must be in line with valid data protection rules in compliance with the data administration objectives.

**h) "Consent of appropriate party"** means a voluntary, particular, adequate and informed clear statement about will of the affected person, by which the statement or confirmation is expressed in an unambiguous manner and means an expression of consent with its personal data processing.

**i) "Incident"** results in leakage of transmitted, saved personal data, that were either in an accidental or illegal manner destroyed, lost, changed, disclosed without any authorisation, or accessed without any authorisation.

## 2. Data administrator:

**Web shop [www.sexuallytoys.com](http://www.sexuallytoys.com)**

## 3. Data administration legislation, purpose and time

Affected persons, entities on web sites may provide their information and data in two ways:

- Personal data expressly affected or made accessible at using the web shop services (see 3.1);
- In relation to use of the web shop, information provided to the data administrator related to visiting of the website and its use (see 3.2).

Legislation related to data processing is in any case the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) pursuant to Art. 6(1)(A) of the Regulation (hereinafter referred to as "Regulation") on the basis of voluntary provision of the affected person.

The affected person has the right for complete deletion of the personal data.

### 3.1. Personal data processing

Data administration	Scope of administered data	Data administration period	Data processing purpose	Data processing legislation
Registration	Contact data:  Surname  First name  Telephone number  E-mail address  Invoicing address:  Country, zip code, city, street, house	Registration of personal data that are obligatory at ordering start to be processed by their registration and end by a request for cancellation. If the affected person does not ask for cancellation of his registration, the data administrator will delete them within 30 days after liquidation of the web shop.	Registration in the web shop and available used services (purchase, participation in the loyalty programme, invoicing options, deliveries from the contractor)	Voluntary consent of the affected person, entity

	number			
Adding contacts to the data administration tool by e-mail, by a phone call, by mail.	Name, e-mail address or any information that the affected person will provide voluntarily	Requests sent by mail or e-mail: Processing of personal data provided during the contact will start by automatic insertion of data, and end only by the request for deletion. If the affected person during the contact does not ask for deletion of his personal data, except for the letter with complaint, they will be stored in the data administrator's system for 10 years. If the web shop is liquidated during this period, they will be deleted from the system not later than by 30 days after the end of the web shop. Complaints are stored in the system for 5 years.  Data administrator's calls are not recorded; data are recorded only if the affected person provides his data voluntarily. A record will be written about the filed complaint that the data administrator keeps for 5 years.	contact, touching base  handling complaints	Voluntary consent of the affected person, entity

### 3.2. Other personal data processing

Newsletter, DM activity	Name E-mail address	The data administrator administers these data, if the affected person does not cancel the newsletter subscription by clicking on the requested link or in written by e-mail or mail. In case of cancellation of the newsletter subscription, the data administrator will not send any advertisement to the affected person anymore. In case of subscription related to various types of newsletters, cancellation of the subscription has to be made for each of them separately.	Promotion of data products and services, promotion of events other than advertising and marketing messages, invitations oriented on the given customer	Voluntary consent of the affected person
Sending a customer-tailored offer (profiling)	Name, E-mail address Range of purchased products	The data administrator processes this information until the affected person does not arise any complaints about the profiling. He can make this anytime without giving a reason and without any consequences by a written statement addressed to the data administrator. In case of complaint, the data administrator will not use	The data administrator prepares the analysis of purchase habits of a particular person (or a group of individuals) at profiling to show the customer-tailored advertising so to publish a personalised	The customer-tailored advertising related to the business data management, displaying, sending – except for notifications on reservations or deficiencies – will be made only if the affected person

		relevant data for profiling anymore, and the affected person will not be authorised to use the website anymore.	newsletter.  The data administrator can recommend identical or similar products that are corresponding to their interests defined by six groups of products.	asks for it.
Loyalty bonus system	Personal data provided during registration.	Personal data given during registration are administered by the data administrator unless the affected persons asks for deletion. If the affected person does not ask for deletion of personal data, the data administrator deletes these data by 30 days after liquidation/cancellation of the web shop.	By registration in the web shop, the affected person takes part in the loyalty bonus system providing certain benefits. At each purchase, he receives some points credited to the affected person's account, and afterwards the person can use these points at the next purchase.	Voluntary consent of the affected person
Heureka.sk	E-mail address,  Purchased product Heureka.sk reliable shop  Cookie: _aku	These data are handed over unless the affected person objects at the data administrator.	Asking for and displaying a feedback from customers.	

**More information about the Heureka service:** The data administrator administers the system based on independent responses of customers to be able to provide services of the top quality. Thus, the service "Customer evaluated" is activated. The operator of the evaluation system is [www.heureka.sk](http://www.heureka.sk). After purchase of goods from the web shop, the customers are asked for an independent evaluation. Thus, a questionnaire is sent from heureka.sk to the e-mail address together with name of the purchased product/products, based on which the web shop can be evaluated. The customer's evaluation and reviews provide a real image of quality of the shop.

By sending an order, the affected person agrees with transfer of data for this purpose.

Personal data transferred in this way provided to Heureka Shopping s.r.o. (Headquarters: Karolinská 650/1 186 00 Prague 8 - Karlín, Czech Republic) ([www.heureka.sk](http://www.heureka.sk)) cannot be used for its own purposes. It is authorised to process them only for achievement of the objectives mentioned herein.

More information is provided on <https://www.heurekashopping.sk/pre-zakaznikov/podmienky-pouzivania-pre-zakaznikov/ochrana-sukromia>.

Provided data: e-mail address, name of purchased product/products.

The data administrator provides personal data to the supplier for delivery of goods, i.e. address of delivery and name of the recipient.

The data administrator administers personal data mainly during validity of relation with the affected person (at the end of which the data will be deleted), or unless the affected person asks for deletion of his data.

### **3.3. Data collected in relation to use of the web site (other data management)**

#### **3.3.1. Technical details, details on visiting the web shop**

When analysing logged in, registered files, the data administrator does not try to identify a respective person.

The IP address is a series of figures that can be clearly identified by a web user's computer. Thanks to IP, the visitor can be geographically retrieved and localised by his computer. Based on name of the web site, date, time data, the affected person can be indirectly identified, or in combination with other (as mentioned for instance during registration), data can be suitably derived.

**Range of administered data:** date, time, IP address of computer, name of visited website, data on prices and data regarding age of the affected person.

**Purpose of data administration:** the system for data administration automatically records an IP address of the affected computer, time of the beginning of visit in relation to configuration of the computer, type of web browser and operating system. Data recorded in this way cannot be connected with other personal data. Data are administered only for statistical purposes.

**The purpose** of data protection **is** check of functionality of the service, provision of personalised services and prevention of misuse.

**Data administration period:** 30 days from the day of visiting the website.

#### **3.3.2. Administration of cookie files**

Cookies are small text files that can be sent to the web browser at visiting the websites and stored in your equipment (computer or other equipment with internet access, such as smartphone or tablet). Cookies are stored in the directory for your internet browser files. Cookies contain usually the name of website they come from, and date of their origin. When visiting the website again, the web browser reads the cookies again, and sends this information back to the website that originally created the cookies. Cookies we use do not damage a computer.

- **Temporary cookies:**

Purpose of data administration: these cookie files serve for making the websites more effective and safer; they are necessary for correct functioning of the website or some applications.

Data processing period: Only when visiting these sites; afterwards, they are automatically deleted.

- **Permanent cookie:**

Purpose of data administration: The data administrator uses also permanent cookie files that have better user interface (e.g. they provide an optimised navigation). These cookie files are stored in the browser for a longer period. The period of storage depends on setting used by a web browser of the affected person.

Data processing period: These cookie files are stored longer in your browser. Ranging from 1 to 5 days

- Shopping basket cookie,

- Safety cookie files
- Cookies required for a password protected relation.
- Customer's satisfaction  
cookie: NPS\_3500f360\_\_ last\_seen, NPS\_3500f360\_ Survey

**Range of processed data:** Do not collect personal data.

**Range of affected persons:** all visitors of the website.

**Purpose of data administration:** differentiation, identification of a current relation of involved parties, with regard to their storage in files a loss did not occur, administration of the shopping basket

**Data processing time:** for processing of Session Cookies after the end of the website visit, while in other cases it takes 30 days. In case of lifetime, these are 2 calendar days.

### **Removal of cookie files**

The affected person has the right to use cookies, delete cookies from his computer, or ban them in the browser. Cookie files are usually accessed in the offer Tools / presets of browsers in the offer Privacy / History / Own setting, cookie files, cookie files or tracking.

The website can contain information, mainly advertising, coming from third parties and advertising providers who are not affiliated with the data administrator. These third parties can place cookie in the computer to collect data, or they can send advertisements in relation to their own services. In such cases, the data protection follows the data protection rules defined by these third parties, and the data administrator is not responsible for such data processing.

### **3.3.3. Data administration for external service providers**

The portal html code contains hypertext links from an external server independently of the data administrator and links to an external server. The external service provider is connected directly to your computer. We remind our visitors that providers of these links can collect user files for direct communication with their blocked browser by direct connection from their server.

Potentially customer-tailored content for the affected person is provided by an external service provider.

More and detail information on processing and administration of data will be provided by the external providers of these services.

In case of customer-tailored services, the external service providers will place a small data packet, cookies. If your browser and the saved cookie file send a response, the service providers processing it will be able to connect the current visit of the affected person with the previous visit but only within the own content.

The data administrator uses external service providers (Google, Facebook) for advertising. These third-party service providers (Google, Facebook) save the cookie files to ensure that the affected person visited the previous website of the data administrator, and publish a personalised advertising (i.e. remarketing activity).

### **3.3.4. Google which cookie Analytics (cookies)**

Independent measurement and audit of a website visitor and other web analytic data are provided by an external service provider Google Server Analytics. Google can provide detail information about processing data on measurement on [www.google-analytics.com](http://www.google-analytics.com).

Google Analytics provide analytic services for Google Inc. ("Google"). Google Analytics by the affected computer and the cookie (cookies) file will prepare an analysis of website user

interactions. Analytics administers data on the voluntary basis from website users. The purpose of cookies analysis are summary, anonymised data based on which the identification of computer is very difficult, but it cannot be completely excluded.

Cookie files collected during the analysis are transferred and saved on Google servers. This information are processed by Google in the name of the data administrator for evaluation of everyday habits of users, generation of reports on frequency of their use on websites and execution of other services related to use of the data administrator. At work, Google Analytics anonymises IP addressed, do not user a UserID to protect personal data.

Google uses cookies (cookie products). Other information can be seen in the following link: <http://www.google.com/policies/technologies/ads/>

Google personal data protection principles can be seen on the following link: <http://www.google.com/intl/hu/policies/privacy/> .

**Scope of administered data:** IP address, analytic cookie files are anonymised and aggregated data which cannot be used for identification of a computer or respective person.

**Data storage time:** 26 months

Google Analytics cookie: \_ utma , \_ utmb , \_ utmc , \_ utmz , \_ utmv

### 3.3.5. Google Adwords

The website uses the Google Adwords codes for monitoring the remarketing. It is based on the ability to look for website visitors later on sites in the Google advertising network with remarketing advertising. The remarketing cookies code is used for identification, classification of visitors. The website users can block these cookies if they visit the Google advertising setting administrator and proceed according to instructions on these sites. After blocking, they will not receive any personalised price offers from the data administrator.

**Scope of processed data:** value of purchase, visit of the given sub-page, time and place

**Data storage time:** to the next purchase

goolge Analýza , Google Adwords

Cookie: \_ ga , \_ gat , \_ gid

## 4.1 Information and access to personal data

The affected person has the right to access, check anytime which information and personal data are stored and processed by the data administrator. The respective request for access to personal data must be sent to the data administrator in written (by e-mail). The data administrator provides information in a widely used electronic format for the affected person. The data administrator does not provide any information, personal data of the affected person orally or through a phone call.

In case of application of the right for access to information, the information contains the following data:

- Defines the scope of administered data: name, invoicing name, invoicing address, e-mail address, phone number in relation to the used service.
- Purpose, time and legislation of data administration on the scope of processed data.
- Data transmission: to whom the data were handed over or provided later,
- Identification of a data source.,

The data administrator provides a copy of administered personal data as a hard copy or in an electronic form to the involved parties for free for the first time. In case of additional copies asked by the affected person, the data administrator can charge an adequate fee on the basis of administrative costs. If the affected person asks for sending information electronically, the data administrator will send them by e-mail.

If the affected person on the basis of provided information has certain objections, pursuant to point 6, he may ask for correction, supplementing, deletion, limitation of processing of personal data as well as protection of these personal data. Or he may proceed as mentioned in point 7.

#### **4.2. Right for correction and supplementing of administered personal data**

If asked by the affected person, the data administrator will correct incorrect personal data without undue delay, or he will fill out incomplete data with the content mentioned by the affected person. The data administrator informs all recipients of corrections or supplementing by which he informed of personal data, unless it is impossible or requires an inadequate effort. If you ask in written, you will be informed of contact data of these recipients.

#### **4.3. Right to limit data processing**

The affected person is authorised to submit a written request and the data administrator is authorised to limit the data processing, if:

- the affected person doubts accuracy of personal data; in this case the limitation relates to time according to which the data administrator can check the correctness of personal data,
- the use of data is illegal, and the opponent is taking a stand against deletion of data and instead of this he asks for limitation of their use,
- the data administrator does not need personal data for the data administration purposes, or an affiliated entity asks them to submit, enforce or protect legal claims,
- a subject of data use; in this case, the limitation relates to duration of specification, or legitimate reasons of the data administrator above authorised reasons of the affected person prevail.

The data administrator informs the affected person in advance of limitation of data processing as well as of its cancellation.

#### **4.4. Right for deletion (forgetting)**

If asked by the affected person, the data administrator will delete personal data without undue delay, if some of the following reasons is justified: i) personal data are not needed for the purposes they were collected or administered in any other way by the data administrator anymore; ii) the affected person takes back the data administrator's consent and does not have any other legal basis for data processing; iii) no legitimate reason for data administration exists; iv) the affected person does not agree with personal data processing for the direct marketing purposes, including profiling, if it relates to direct data acquisition; v) if personal data are processed by the data administrator illegally; vi) provision of information company services for collection of personal data directly to children. The affected person cannot apply his right for deletion, if a freedom of speech, a public interest in the area of public health are endangered. For the purposes of archiving of the public interest, scientific, historic or statistical purposes.

#### **4.5. Right for storage/archiving of data**

Storage, archiving of data serve for the purpose that the affected person can obtain and use personal data administered by the data administrator. Transmitted data are limited. They do not contain for instance statistics, data on transactions, data on the loyalty system etc.

The data administrator processes the request written and sent only by e-mail or mail. The affected person has to come personally to the data administrator's office to verify his identity, where the data administrator verifies the identity according to given data.

#### **4.6. Objection to personal data processing**

The affected person has the right to raise an objection anytime to personal data processing; it relates also direct marketing purposes, including profiling. The data administrator shall process the objection and will not further use processing of personal data for these purposes.

The objection has to be raised in written (by e-mail), or in case of newsletters by clicking on the link for cancellation of subscription in the e-mail.

#### **5. Options of collection of right**

Your rights can be applied only in written by e-mail.

#### **Contact:**

E-mail address: [administration@sexuallytoys.com](mailto:administration@sexuallytoys.com)

The affected person cannot enforce his rights if the data administrator proves that the affected person cannot sufficiently identify himself. If, from the affected party side, the request is not authorised or it is excessive (mainly concerning repetition), the data administrator can charge an adequate fee for execution of the request or refuse the measure. If the data administrator doubts identity of the natural person, who submitted the request, he can ask for additional information to confirm identity of the requesting person.

If the affected does not agree with the data administrator's decision, he can apply his rights before the court, or authority for protection of personal data and information.

#### **6. Processing of data administration incident**

The data incident results in leakage of personal data transmitted, archived or otherwise treated against accidental or illegal destroy, loss, change, unauthorised disclosure or unauthorised access. In case of such leakage, the data administrator informs the affected person, and keeps a register with the aim to inform him of the leakage and adopted measures. If the data administrator suspects that a certain event represents a high risk for rights and freedom of the affected persons, he shall inform without undue delay but not later than within 72 hours a respective authority of the incident.

#### **7. For personal data protection authority**

The personal data protection authority, as well as relevant court, prosecutor, investigation authority, administration body can ask the data administrator for personal data of the affected person.

The data administrator shall issue personal data for the authorities – if the authority specifies an exact purpose and scope of data – only in the scope and extent necessary for the purpose of request.

#### **8. Links**

The data administrator does not answer for contents, procedures and protection of data and information on websites of third parties as a link on his websites. If the data administrator finds out that the website or link it refers to breaches the rights of third parties or respective legislation, he shall immediately delete the link from the websites.

#### **9. Method of personal data storage, safety of data administration**

The data administrator undertakes to ensure safety of data, make technical and organisational measures, and define procedural rules by which he will ensure that recorded, saved or processed data are protected, or to prevent their damage, unauthorised use, or unauthorised change. This is

binding also for any other third party to which data is transmitted on the basis of a content meeting requirements for securing and administration of data.

The data administrator will make everything to prevent accidental damage or destroy of data. The data administrator asks all his employees to follow this obligation.

The data administrator selects and administers IT tools used for administration of personal data at provision of service so that the processed data:

- (are available) to authorised persons;
- trustworthiness and authentication (trustworthiness of data administration);
- its integrity cannot be verified (data integrity);
- unauthorised access (confidentiality of data).

The data administrator protects data by suitable measures against unauthorised access, modifications, publishing, deletion, destroy, accidental destroy or damage.

The data administrator secures stored data by a suitable technical solution for protection of electronically processed files in his different registers – if not allowed by legislation – they cannot be directly connected and assigned to another entity.

With regard to the latest technology, the data administrator provides technical, organisational measures for protection of data administration security, and provides a level of protection corresponding to data administration risks.

During data administration, the data administrator maintains:

- confidentiality: protects information so that only an authorised person can access it;
- integrity: protects correctness and completeness of information and method of processing;
- Availability: Ensures that if the affected person needs it, he can really obtain required information and have access to respective tools.

Information systems of the data administrator and partners are also protected against frauds, espionage, sabotage, vandalism, fire, floods, computer viruses, computer breaks and attacks. The operator provides the security by security procedures at the server level and at the level of applications.

We inform the affected persons that electronic messages sent through internet (e-mail, web, ftp etc.) are liable to network threats leading to frauds. The data administrator will adopt all preventive actions to protect against such threats. The systems are monitored so to catch all security risks and provide evidences on security risks. Monitoring of the system enables also check of efficiency of prescribed actions.

## **10. Other provisions**

The data administrator reserves the right to anytime change, modify in the entire wording these Personal Data Protection Rules that are available and published on the [\*\*www.sexuallytoys.com\*\*](http://www.sexuallytoys.com) website without any previous notification.