

Customer Privacy Policy

Key principles

There are a range of laws to safeguard your personal data (the most important of which is the General Data Protection Regulation or “GDPR”). We are committed to doing its part to protect your personal data and comply with those laws.

In practice, this means that all personal data which we hold about you will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

1.Overview

Purpose of this Privacy Policy

This Privacy Policy sets out how we collect and process your personal data as a customer.

By visiting our Site and by submitting your personal data to us, you are accepting and consenting to the practices described in this Privacy Policy.

It is important that you read this Privacy Policy so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other policies and is not intended to override them.

Finally, our Site is not intended for children and we do not collect data relating to children.

Who we are

We are: All4way.com

Gureev Vertrieb & Service

Our registered address is :

Bergtalstraße 25

9500 Wil, Schweiz

Contact details

We welcome questions and comments regarding this Privacy Policy or our use of your data. If you would like to contact us please use the details below or any relevant links provided on Site.

Email address: info@all4way.com

2. The data we collect about you

“Personal data” means any information about an individual from which that person can be identified. This kind of data can be divided into:

Identity Data includes your name, username or similar identifier, marital status, title, date of birth and gender (this will primarily be text based, but could also include audio, photos, videos and other forms of media).

Contact Data includes billing address, delivery address, email address and telephone numbers.

Financial Data includes bank account and payment card details.

Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.

Technical Data includes the internet protocol (IP) address of your device, details of the cookies on your device, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Site.

Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, reviews, feedbacks and survey responses.

Usage Data includes information about how you use our site, products and services.

Marketing and Communications Data includes your preferences in receiving marketing communications from us and our third-parties and your communication preferences.

We do not collect any “**Special Category Data**” about you. Special Category Data includes details about your race or ethnicity, religious or philosophical beliefs, sexual

orientation, political opinions, trade union membership and information about your health, genetic or biometric data. Nor do we collect any information about criminal convictions and offences.

If you fail to provide your personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our products or services). In this case, we may have to cancel a product delivery or service you have with us (but we will notify you if this is the case at the time).

3. How we collect your personal data

You may give us personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes:

Information that you provide by filling in forms on our Site: This includes information provided:

- at the time of registering to use our Site;
- when subscribing to a newsletter;
- through a contact form;
- when posting material such as ratings and reviews;
- when requesting further services;
- when searching for a product;

Social Media: Information that you provide to us on our Social Media pages, such as Facebook, Twitter, Instagram;

Order details: Information that you provide in relation to an order or a product you have purchased. This includes details of any cards which you have successfully used to purchase products on the Site.

Troubleshooting details: Information that you provide when you report a problem with our Site;

Survey details: Information that you provide through surveys or when asked to give your opinions about our services and products;

Contact details: Information that you provide when contacting our Customer Services Team or otherwise corresponding with us;

Transaction details: Details of transactions which you carry out with us and of the fulfillment of your orders (such as your intended delivery address and financial details).

Automated technologies or interactions

We may also collect and process the following data automatically when you use our site:

- the internet protocol (IP) address of your device, your login information, details of the type of device you use, a unique device identifier (for example, your device's IMEI number, the MAC address of your device's wireless network interface, or the mobile phone number used by your device), mobile network information, your browser type and version, your time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time), products you viewed or searched for, page response times, download errors and bugs, the length of your visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the Site and any phone number used to call our customer service number;
- information stored on your device which you consent to share with us (such as contact information, friend lists, login information, photos, videos or other digital content) (you can typically turn off this functionality at any time by changing the relevant settings for the App on your device);
- any details of your current location which you consent to share with us (you can typically turn off this functionality at any time by turning off the 'location services' settings for the App on your device);
- information provided to us by third-parties (including, for example, business partners, sub-contractors in technical, Wi-Fi, payment and delivery services, advertising networks, analytics providers, search information providers and credit reference agencies).

Cookies: We may also receive Technical Data about you if you visit other websites employing our cookies.

We use cookies to:

- personalise our Site to you. For example, to try and ensure that language and region displays are correctly configured for you;
- allow you to use our Site in a way that makes your browsing experience more convenient;
- personalise the advertisements which we place to you;
- improve our Site. For example, knowing how our users navigate our Site and use its features allows us to streamline the user experience, speed up searches, identify bugs, make enhancements and ultimately get you to the right page and product faster;
- review the popularity of our products and advertisements with reference to platform, location and other related factors;
- estimate our audience size and usage pattern;
- provide faster and more personal service by collecting information in respect of any accounts which you have on our Site;
- collect Anonymised Data about the websites from which users have travelled to our Site;
- prevent credit fraud and various forms of cyber-crime.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data if:

- we need to perform the contract we are about to enter into or have entered into with you;
- it is necessary for our legitimate interests (or those of a third-party) and your interests and fundamental rights do not override those interests;
- we need to comply with a legal or regulatory obligation;
- you have specifically consented to us using your personal data in a particular way.

5. Disclosures of your personal data

First and foremost, you can rest assured that your personal data will not be shared with third-parties unnecessarily. We may disclose your personal data for the purposes set out in this Privacy Policy:

- if the possibility of such disclosure is otherwise stated in this Privacy Policy, our Terms of Use, our Terms and Conditions of Sale or otherwise when the personal data is collected from you;
- to service providers acting as processors or joint controllers who provide us with IT and system administration services;
- to professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide us with consultancy, banking, legal, insurance and accounting services;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to protect our rights, property, or safety, or the rights, property or safety of our customers, or others. This includes exchanging information with: (a) the police or other investigatory or law enforcement authorities; and (b) companies and organisations involved in fraud protection and credit risk reduction;
- to third-parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third-parties to respect the security of your personal data and to treat it in accordance with the law. Unless specifically stated in this Privacy Policy, we do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, 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 unauthorised 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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. We typically retain this information for a further six to twelve months to ensure that no relevant claim has been made within that six year period before we dispose of it.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

7. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out above, please contact us using the details set out in the “Contact Details” section (Overview of this policy and who we are). A summary of the rights you have is set out below:

Opting-out of Marketing: You can ask us or third-parties to stop sending you marketing communications at any time.

Data Subject Access Requests: You have the right to request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Correction: You have the right to request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Erasure: You have the right to request we erase your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Processing Objection: You have the right to object to us processing your personal data where we are relying on a legitimate interest (or those of a third-party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Processing Restriction: You have the right to request we restrict the processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Data Transfer: You have the right to request we transfer your personal data to you or to a third-party. We will provide to you, or a third-party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdrawing consent: You have the right to withdraw your consent to processing where we are relying on that consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.