



## Privacy Policy of VRFD SA

The protection of your personal data is particularly important to us. We therefore process your data solely on the basis of the statutory provisions. This privacy statement provides you with information on the most important aspects of data processing within the context of our ("Site").

### 1. Who is the Data Controller?

VRFD SA, Via Serafino Balestra 12, 6900 Lugano Switzerland (CHE-295.339.604) is responsible for the collection and processing of your personal data .

### 2. Personal information collected

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically-collected information as "Device Information."

We collect Device Information using the following technologies:

- 2.1. "Cookies" are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.
- 2.2. "Log files" track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- 2.3. "Web beacons," "tags," and "pixels" are electronic files used to record information about how you browse the Site.

Additionally, when you make a purchase or attempt to make a purchase through the Site, we collect certain information from you, including your name, billing address, shipping address, payment information (including credit card numbers or any other accepted payment types), email address, and phone number as well as other data related to the transaction]. We refer to this information as "Order Information."

Further, if you request information regarding VRFD and its products, we collect name, e-mail and other contact information, that you have provided, in order to communicate with you ("Contact Information")

When we talk about "Personal Information" in this Privacy Policy, we are referring to Device Information, Order Information and Contact Information.

### 3. Purposes of data processing?

We use the Order Information that we collect generally to fulfil any orders placed through the Site (including processing your payment information, arranging for shipping, and providing you with invoices and/or order confirmations). Additionally, we use this Order Information to:

- 3.1. Communicate with you;
- 3.2. Screen our orders for potential risk or fraud; and
- 3.3. When in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.
- 3.4. Perform the purchase order that you have placed.
- 3.5. To fulfil legal and fiscal obligations.

We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our customers browse and interact with the Site, and to assess the success of our marketing and advertising campaigns).

Additionally, we use your Contact Information to communicate with you.

#### **4. Legal basis of data processing**

The legal basis for processing your personal data are the following:

- 4.1. Your consent;
- 4.2. the performance of your requests;
- 4.3. fulfil legal requirements;
- 4.4. the legitimate interest of VRFD.

The provision of personal data is necessary for the conclusion and/or performance of the contract, and it is voluntary. However, if you do not provide personal data, the management and administration processes might be delayed or impossible.

#### **5. Sharing your personal information**

We share your Personal Information with third parties to help us use your Personal Information, as described above. When we work with outside companies who provide services requiring the processing of personal data, they may only use your data for the purposes specified by VRFD SA. They may not, therefore, use it for their own purposes or pass it on to third parties. For example, we use Google Analytics to help us understand how our customers use the Site--you can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/>.

You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

If you opt-in, we may use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you.

You can always opt out of targeted advertising by:

[to include opt-out links from whichever services being used (Facebook, Instagram, Twitter,...)] Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

Your personal data may be shared with companies and professionals who provide VRFD with various services (for example: IT, Internet, legal or tax services). These subjects are appointed by VRFD as data processors under art. 28 of GDPR.

Finally, we may also be required by law to disclose your information to government agencies or third parties. In any case, we will only disclose as much as is required by law.

#### **6. Newsletter**

You can subscribe to our newsletter via our website. To be able to send you our newsletter, we need your e-mail address and your consent to receiving the newsletter. You can cancel the newsletter subscription at any time..

#### **7. Do not track**

Please note that we do not alter our Site's data collection and use practices when we see a Do Not Track signal from your browser.

#### **8. Data protection guarantee**

We have appropriate technical and organisational measures in place to ensure the confidentiality and integrity of your personal data. We protect your personal data against unauthorised or accidental destruction, accidental loss, technical errors, falsification, theft or misuse and against unauthorised modification, copying, access or other processing.

Please note, however, that the transmission of information via the Internet and other electronic means involves security risks and that we cannot provide any guarantee for the security of information transmitted to us through these channels.

## 9. Your rights

You are basically entitled to the rights of information, rectification, erasure, restriction, data portability, revocation and objection.

You have the right to access personal information we hold about you and to ask that your personal information be corrected, updated, or deleted. If you would like to exercise this right, please contact us through the contact information below.

Additionally, we note that we are processing your information in order to fulfil contracts we might have with you (for example if you make an order through the Site), or otherwise to pursue our legitimate business interests listed above.

## 10. Data retention

We will retain your personal data for as long as we believe it is necessary or appropriate to comply with applicable law, or for as long as it is necessary for the purposes for which it was collected. Retention periods may also vary depending on the type of data and in some cases are required by law. When you place an order through the Site, we will maintain your Order Information for our records unless and until you ask us to delete this information.

## 11. Policy changes

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

## 12. Contact us

For more information about the data protection declaration or your personal data in our possession, if you have questions, or if you would like to make a complaint, please contact us by e-mail at:

[dataprotection@vrfd.ch](mailto:dataprotection@vrfd.ch)

or by mail using the details provided below:

VRFD SA  
Via Serafino Balestra 12  
6901 Lugano  
Switzerland

## 13. Representative in the European Union

The contact details given above may be used by anyone for any communication relating to data protection. For supervisory authorities and customers based in the European Union, there is also a representative in the EU who can be contacted at the following address:

**GR LEGAL law firm** with registered office in Padova (Italy),  
via Nicolò Tommaseo 69/D 35131 Padova PD, Italy  
e-mail: [dataprotection@vrfd.ch](mailto:dataprotection@vrfd.ch)