

## PRIVACY POLICY

Your security and satisfaction is our priority, therefore personal information provided on the website and online credit card transactions are transmitted through a secure server. We are committed to handling your personal information with high standards of information security. Our website uses encryption technology, like Secure Sockets Layer (SSL), to protect your personal information during data transport.

**According to the Spanish law Ley Orgánica 15/1999, of the 13th of December, the personal data protection act (“Ley de Protección de datos de carácter personal”, from here on “LOPD”), we would like to inform you that the information and data that you provide personally and voluntarily by using [www.artiggallery.com/.es/.de](http://www.artiggallery.com/.es/.de) (the “website”), its forms, or by contacting us through other media, will be incorporated and stored by Artig Gallery, S.L. (from here on “Artig Gallery” or “we”), with Fiscal Identity Code B-66525155, with registered entries at Registro Mercantil de Barcelona (Spain), tomo 44.819, folio 50, hoja B-468.440.**

The purpose of this document is to assure that persons, whose data is processed by us (hereinafter also “**you**” or “**data subjects**”), obtain the fullest information regarding data being processed and your rights and our obligations associated with such processing. The fundamental legal regulation that governs personal data processing, beginning on 25 May 2018 is the EU General Data Protection Regulation (hereinafter also “**GDPR**”).

## **Contents:**

|            |   |           |
|------------|---|-----------|
| <b>1</b>   | <b>GENERAL INFORMATION</b>  | <b>4</b>  |
| 1.1        | Definition of main terms  | 4         |
| 1.2        | Scope of validity   | 5         |
| 1.3        | Controller  | 5         |
| 1.4        | Data protection officer   | 6         |
| <b>2</b>   | <b>ITEMISATION OF DATA PROCESSING OPERATIONS</b>                                      | <b>6</b>  |
| <b>2.1</b> | <b>General information about the data processing operations</b>                       | <b>6</b>  |
| 2.1.1      | No obligation to provide personal data & consequences of failure to provide such data | 6         |
| 2.1.2      | Grounds of data processing – in general   | 6         |
| 2.1.3      | Security Measures   | 7         |
| 2.1.4      | Transfer of personal data to third countries  | 8         |
| 2.1.5      | Hosting at external service providers   | 8         |
| 2.1.6      | Data recipients   | 8         |
| 2.1.7      | Period of storage – data retention  | 9         |
| 2.1.8      | Data categories   | 9         |
| 2.1.9      | Exercise of rights:   | 10        |
| 2.1.10     | Responsibility for content:   | 10        |
| 2.1.11     | Future changes of our Privacy Policy:   | 11        |
| <b>2.2</b> | <b>Accessing our services</b>   | <b>11</b> |
| 2.2.1      | Purposes of data processing, legal basis, legitimate interests (where applicable)     | 11        |
| 2.2.2      | Recipients  | 12        |
| <b>2.3</b> | <b>Account maintenance</b>  | <b>12</b> |
| 2.3.1      | Purposes of data processing, legal basis, legitimate interests (where applicable)     | 12        |
| 2.3.2      | Recipients  | 14        |
| <b>2.4</b> | <b>Newsletter subscriptions</b>   | <b>14</b> |
| 2.4.1      | Purposes of data processing, legal basis, legitimate interests (where applicable)     | 14        |
| 2.4.2      | Recipients  | 15        |
| <b>2.5</b> | <b>Contests and promotional actions</b>   | <b>16</b> |
| 2.5.1      | Purposes of data processing, legal basis, legitimate interests (where applicable)     | 16        |
| 2.5.2      | Recipients  | 16        |
| <b>2.6</b> | <b>Tracking (COOKIES)</b>   | <b>17</b> |
| 2.6.1      | Definition and use  | 17        |
| 2.6.2      | Third Party Cookies:  | 18        |
| 2.6.3      | Tracking for the purpose of personalised newsletter                                   | 20        |
| 2.6.4      | Disabling cookies   | 20        |
| <b>2.7</b> | <b>Social media plug-ins</b>  | <b>21</b> |

|          |  |           |
|----------|--|-----------|
| <b>3</b> | <b>RIGHTS OF DATA SUBJECTS</b>             | <b>22</b> |
| 3.1      | Right to object                            | 22        |
| 3.2      | Right of access                            | 23        |
| 3.3      | Right to rectification                     | 23        |
| 3.4      | Right to erasure ("right to be forgotten") | 23        |
| 3.5      | Right to restriction of processing         | 23        |
| 3.6      | Right to data portability                  | 23        |
| 3.7      | Right to withdraw consent                  | 23        |
| 3.8      | Right to lodge a complaint                 | 24        |

# 1 General information

This section of the privacy statement contains information on the scope of validity, the person responsible for data processing, the data protection officer and data security. It also begins with a list of definitions of important terms used in the data privacy statement.

## 1.1 Definition of main terms

- a. **Browser:** Computer program used to display websites (e.g., Chrome, Firefox, Safari)
- b. **Cookies:** Text files which the web server places on the user's computer by means of the browser which is used. The stored cookie information may contain both an identifier (cookie ID) for recognition purposes and content data, such as login status or information about websites visited. The browser sends the cookie information back to the web server with each new request upon subsequent repeat visits to these sites. Most browsers accept cookies automatically. Cookies can be managed using the browser functions (usually under "Options" or "Settings"). The storage of cookies may be disabled in this way or it may be made dependent on the user's approval in any given case or otherwise restricted. Cookies may also be deleted at any time.
- c. **Third countries:** Countries outside the European Union (EU)
- d. **GDPR:** Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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), available at <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679>
- e. **Personal data:** Any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- f. **Profiling:** Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
- g. **Website:** The website [www.artiggallery.com](http://www.artiggallery.com), and all services that we perform at this URL address described in more detail under item I.2.

- h. **Services:** Website and contests and promotional actions that we may, from time to time, organize (including, without limitation contests and promotional actions organized *via* social media).
- i. **Tracking:** The collection of data and their evaluation regarding the behaviour of visitors in response to our services.
- j. **Tracking technologies:** Actions can be tracked either via the activity records (log files) stored on our web servers or by collecting data from end devices via pixels, cookies or similar tracking technologies.
- k. **Processing:** Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- l. **Pixel:** Pixels are also called tracking pixels, web beacons or web bugs. These are small, invisible graphics in HTML emails or on websites. When a document is opened, this small image is downloaded from a server on the Internet and the download is registered there. This allows the operator of the server to see if and when an email has been opened or a website has been visited. This function is usually carried out by calling up a small program (JavaScript). Certain types of information can be detected on your computer system in this way and shared, such as the content of cookies, the time and date of the visit, and a description of the page on which the tracking pixel is located.

## 1.2 Scope of validity

This document pertains to the processing of personal data in respect of Website use, *i.e.* in respect of services available *via* the [www.artigallery.com](http://www.artigallery.com) website, including, without limitation, services that involve maintaining accounts (for users and designers) and newsletter services. Terms and conditions for those services are available under [www.artigallery.com/terms-and-conditions](http://www.artigallery.com/terms-and-conditions)

## 1.3 Controller

The controller of your personal data, *i.e.* the entity that alone determines the purposes and means of the processing of your personal data, who is responsible for the processing of data in relation to the Services, is:

**Artig Gallery S.L. with its seat in Barcelona** with Value Added Tax-Id: B-66525155, commercially registered at Registro Mercantil Barcelona, Volume 44.819, sheet 50, page B-468.440, and operating offices in Calle Sant Elies 21, 08006 Barcelona, Spain, is the owner of the website [www.artigallery.com](http://www.artigallery.com).

## **1.4 Data protection officer**

Our data protection officer can be contacted under the e-mail address [info@artiggallery.com](mailto:info@artiggallery.com) or in writing – by submitting your query in writing to our address (if it mentions that it is for the attention of the data protection officer this will help us address it more promptly).

## **2 Itemisation of data processing operations**

This section of the data privacy statement contains detailed information about the processing of personal data in the context of our Services. The information is subdivided for greater clarity into certain functions in connection with our services. In case of the normal use of the Services, different functions and therefore also different processing operations can be implemented consecutively or simultaneously.

### **2.1 General information about the data processing operations**

The following applies to all the processing operations listed below, unless stated otherwise:

#### **2.1.1 No obligation to provide personal data & consequences of failure to provide such data**

The provision of personal data is not required by law or contract, and you are under no obligation to provide any data. If, using our Services, you provide us with personal data, we may inform you during the data entry process when personal information needs to be provided for the relevant Service (e.g., by indicating "mandatory fields").

In order to be able to register to our website or to fill out electronic forms on our website, the user has to share personal data in order to receive our services. The required data will be marked and if the required information is not provided, the user will not be able to register or sign up.

The user guarantees the authenticity of the data he or she submits to or through [www.artiggallery.com](http://www.artiggallery.com). Furthermore, the user guarantees to maintain the information updated, as he or she is the only person responsible for the correctness and validity of the data. The data requested during the registration process and during the life of the membership must be provided fully and correctly, including in particular a fully functional e-mail address, as a precondition for membership. If data provided to [www.artiggallery.com](http://www.artiggallery.com) change, the member is obliged to update his account with immediate effect and will be held solemnly responsible for all damages caused to Artig Gallery or third parties through incorrect or incomplete information.

#### **2.1.2 Grounds of data processing – in general**

The stored data will be used to manage the services offered by Artig Gallery on our

website and handle the transactions and orders that our customers can conduct via our website. The personal data that is required from the users when registering, are collected for the following reasons:

- Management and control of your client account and to respond to inquiries about product information and services
- Management and control of compliance by the user of the Privacy and Cookies Policy of our website
- Management and control of transactions and purchases made through our website
- Management and control of compliance by the user of the General Terms and Conditions of our website, the user account and the purchases made on the Web
- The periodic remission of electronic mail about commercial communications, promotional or advertising of services and products via the web [www.artig-gallery.com/.es/.de](http://www.artig-gallery.com/.es/.de) , in accordance with Article 21 of Law 34/2002 of the 11th of July, about Services of Society of Information and Electronic Commerce (“Servicios de la Sociedad y la Información y Comercio Electrónico”, (SSICE))

We will not use the personal data of our clients for any other reasons, than the ones mentioned above. If we do want to use the data for another reason, we will send prior notification to our clients, allowing a reasonable period of time to oppose to it.

Clients that share personal information with us, agree automatically that Artig Gallery may share the data with third parties if it is necessary to render the service or fulfill the purchase agreement with the client.

We provide a series of different mechanisms for the client who request it, to easily and free of charge enable or disable the reception of electronic communication both on the website and in each commercial email sent.

### **2.1.3 Security Measures**

We commit to adopt the technical and organizational security measures, that guarantee the safety of your personal data and avoid its alteration, loss, or unauthorized access, given the state of technology, the nature of the data stored and the risks to which they are exposed, all in accordance with the provisions of law Real Decreto 1720/2007 of the 21st of December, approving the Regulations implementing the law Ley Orgánica 15/1999 of the 13th of December, on the protection of personal data and other control procedures for the security of information systems. Without limiting the foregoing, it is the responsibility of the user to safely store access codes or passwords that provide access to the user’s registered account on the website, preventing the misuse or access of third party users. We are not responsible for any misuse of the access codes or passwords that users may carry out.

User's consent to the processing and transfer of personal data

By providing and sharing personal data with us and our website, users confirm that they have read, understood and expressly accepted this Privacy Policy and give their express, unequivocal and informed consent to the processing of personal data in accordance with this Privacy Policy as well as the transfer of your personal data to third parties, in accordance with Article 6 of LOPD.

#### **2.1.4 Transfer of personal data to third countries**

When we send data to third countries, i.e., countries outside the European Union, the data are then transmitted strictly in compliance with the statutory conditions of admissibility.

If the transmission of the data to a third country does not serve the purpose of fulfilling our contract with you, if we do not have your consent, if the transmission is not required for the establishment, exercise or defence of legal claims, and if no other exemption applies under Art. 49 GDPR, we will only transmit your data to a third country if in possession of an adequacy decision pursuant to Art. 45 GDPR or appropriate safeguards under Art. 46 GDPR.

One of these adequacy decisions is the Commission Implementing Decision (EU) 2016/1250 of 12.07.2016 on the "EU-US Privacy Shield" for the USA. The level of data protection is generally considered to be appropriate according to Art. 45 GDPR for transfers to companies which are certified under the EU-US Privacy Shield.

Alternatively or additionally, safeguards under Art. 46 subs. 2 c) GDPR through the conclusion of the EU standard data protection clauses adopted by the European Commission with the receiving body provide appropriate safeguards and an adequate level of data protection. Copies of the standard EU data protection clauses are available on the website of the European Commission at [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en).

#### **2.1.5 Hosting at external service providers**

Our data processing work is carried out to a large extent with the involvement of hosting service providers who provide us with storage space and processing capacities at their data centres and who also process personal data on our behalf according to our instructions. It may be the case that personal data are transmitted to hosting service providers in respect of all of the functions listed below. These service providers process data either exclusively in the EU or subject to guaranteed levels of data protection which we have put in place based on the standard EU data protection clauses (cf. subsection 2.1.4.).

#### **2.1.6 Data recipients**

When a third party receives your personal data from us it is either a trusted processor that performs certain data operations for us (according to the abovementioned processing grounds), or the entity that is the other party of the sales agreement that you have concluded *via* the Services (so that the seller knows who the buyer is and *vice versa*) or in highly exceptional situations it may be government authorities (including law enforcement agencies) in cases when we are required to fulfil a legal obligation to which we are subject (legal basis: Art. 6, subs. 1 c) GDPR) or when it is necessary for the assertion, exercise or defence of legal claims (legal basis: Art. 6, subs. 1 f) GDPR).

Examples of data recipients who may receive your data are shown under items 2-5 below (them being listed there does not however necessarily mean that they receive such data in all cases; we may further develop our own services so that certain processing operations that we outsource at the moment are performed by us internally).

### **2.1.7 Period of storage – data retention**

We aim at keeping the periods, during which your personal data is processed to a minimum. However most of the data we process is associated with the ongoing agreements concluded between us and you (account maintenance, newsletter service). Those agreements may be framework agreements by nature, and may result in conclusion of another group of agreements (sales agreements between buyers and sellers).

Our main guideline is to keep your personal data stored for as long as it is necessary; which is usually the period, during which we provide you with a given service and the subsequent statutory limitation periods (that usually start running once the service is concluded). Some data, such as data regarding sales history is retained for as long as you wish us to maintain your account (as it serves the purpose of us rendering the account maintenance service to you) and may be stored beyond the period when that service is rendered if applicable limitation periods have not expired.

Any data that we store for marketing purposes is stored for as long as allowable under your consent or until you object to us storing data for that purpose (in case of marketing performed in pursuit of our legitimate interest).

### **2.1.8 Data categories**

The category names listed below are used for specific types of data in the following sections:

- **Account data:** Login/user ID and password
- **Personal master data:** Title, salutation/gender, forename, surname, date of birth
- **Address data:** Street, house number, additional address lines (where applicable), postcode, city, country
- **Contact data:** Telephone number(s), fax number(s), email address(es)

- **Login data:** Information about the service via which you logged on; times and technical information on login, authentication and logout; data entered by you when logging on
- **Purchase order data:** Ordered products, prices, payment and delivery information
- **Payment data:** Account information, credit card details, data for other payment services such as PayPal
- **Newsletter user profile data:** Opening of newsletter (date and time), contents, selected links, as well as the following information relating to the computer system accessing the newsletter: Internet Protocol address used (IP address), browser type, browser version, device type, operating system and similar technical information.
- **Access data:** Date and time of visit to our service; the page from which the system accessed our site; pages visited during the session; session identification data (session ID), as well as the following information relating to the computer system accessing the service: Internet Protocol address used (IP address), browser type, browser version, device type, operating system and similar technical information.

#### **2.1.9 Exercise of rights:**

We inform you that you have to right to access, modify, cancel or oppose, according to LOPD, any of the mentioned data by submitting a written request to the following address: Artig Gallery, S.L., Calle Sant Elies 21, 08006 Barcelona, Spain, or via email to [info@www.artiggallery.com](mailto:info@www.artiggallery.com). When exercising this right, please attach a copy of your national identity card, passport or other valid identification document.

#### **2.1.10 Responsibility for content:**

Artig Gallery will neither be responsible for errors appearing on the website, nor for an incorrect or inappropriate use of the website by the user of the information. Any external links on [www.artiggallery.com](http://www.artiggallery.com), are the sole responsibility of the owner. If we realize that a link from our website infringes the law, violates rights or public morals, we will eliminate the link immediately. All texts, pictures, photos, animations, softwares and any other content on our website are owned exclusively by Artig Gallery and/or the artists. The content provided by Artig Gallery is protected by the laws governing databases, copyright and trademarks. Such content may be neither copied nor disseminated nor used or copied in any manner whatsoever, without the prior agreement of the corresponding proprietors. This applies in particular to any copies made with the aid of robots, crawlers or other automatic mechanisms. Any use or modification of the services for purposes for which they were not intended is prohibited. In

particular, copying or uploading of content, offers, directories, databases, etc. for commercial purposes is prohibited and will be subject to criminal and civil legal proceedings within the scope of existing legal options.

Our website [www.artiggallery.com](http://www.artiggallery.com) can contain links to other pages. Please keep in mind that if you click on a link you will be redirected to another website, which means that we can neither assume responsibility for their content nor can we guarantee their privacy policy and data protection.

#### **2.1.11 Future changes of our Privacy Policy:**

We may update this Privacy Policy from time to time. An updated version of this Privacy Policy will always be available on our Website. All updates will be effective immediately after its publication.

## **2.2 Accessing our services**

The passages below set out how your data is processed when you access our services (e.g., loading and viewing the website, opening the mobile app and navigating within the app). We would point out, in particular, that it is impossible not to send access data to external content providers (cf. subsection b.) due to the technical processes involved in transmitting information over the Internet. The third-party providers are themselves responsible for the privacy-compliant operation of the IT systems which they use. The service providers are required to decide how long the data will be stored.

### **2.2.1 Purposes of data processing, legal basis, legitimate interests (where applicable)**

| <b>Data category</b> | <b>Intended purposes</b>  | <b>Legal basis</b>          | <b>Legitimate interest, where applicable</b>  |
|----------------------|---|-----------------------------|---|
| Access data          | Establishing connection, presenting contents of the service, detecting attacks on our site due to unusual activities, fault diagnosis | Art. 6, subs. 1 f),<br>GDPR | Proper functioning of services, security of data and business processes, prevention of misuse, prevention of damage through interference in information |

|  |  |  |   |
|--|--|--|---|
|  |  |  | systems, improvement and development of Services. |
|--|--|--|---|

## 2.2.2 Recipients

| Recipient category  | Data concerned | Legal basis               | Legitimate interests, where applicable  |
|---|----------------|---------------------------|---|
| External content providers who provide content which is needed to display the service (e.g., images, videos, embedded postings from social networks, banner ads, fonts, update information) | Access data    | Art. 6, subs. 1 f), GDPR; | Proper functioning of services, (accelerated) display of content              |
| IT security service providers   | Access data    | Art. 6, subs. 1 f), GDPR  | Prevention of attacks through exploitation of security gaps / vulnerabilities |

## 2.3 Account maintenance

The tables below show how your data is processed when you register an account under the URL address [www.artigallery.com](http://www.artigallery.com).

### 2.3.1 Purposes of data processing, legal basis, legitimate interests (where applicable)

| <b>Data category</b> | <b>Intended purposes</b>  | <b>Legal basis</b>           | <b>Legitimate interest, where applicable</b>   |
|----------------------|---|------------------------------|--|
| Account data         | Verification for the purpose of accessing the account   | Art. 6, subs. 1 b), GDPR     |  |
| Personal master data | Verification purposes, handling queries, allowing for conclusion of sales agreements, verification of sales agreements performance, assistance with sales agreements, product delivery, handling complaints and queries | Art. 6, subs. 1 b), GDPR     |  |
| Address data         | Product delivery, handling complaints and queries   | Art. 6, subs. 1 b), GDPR     |  |
| Contact data         | Handling complaints and queries, providing order status information, delivery assistance  | Art. 6, subs. 1 b), GDPR     |  |
| Login data           | Traceability of Service use (registration, deregistration), usage statistics  | Art. 6, subs. 1 b), f), GDPR | Proof of successful account registration / deregistration, improvement and development of services, own marketing and promotional activities |
| Purchase order data  | Maintaining the account and allowing access to purchase history, order tracking by the client,  | Art. 6, subs. 1 b), f), GDPR | Improvement and development of services, own marketing and   |

|              |   |                          |   |
|--------------|---|--------------------------|---|
|              | usage statistics and analysis, market research            |                          | promotional activities  |
| Payment data | Performance of sales agreements                           | Art. 6, subs. 1 b) GDPR  |   |
| Access data  | Reflection of interests in given designer brands/products | Art. 6, subs. 1 f), GDPR | Improvement and development of services, own marketing and promotional activities |

### 2.3.2 Recipients

| Recipient category   | Data concerned   | Legal basis   |
|--|--|---|
| Designers (Sellers) who present their products within the Services and users (Buyers), all of whom are parties to sales agreements | Personal master data, address data, contact data               | Art. 6, subs. 1 b), GDPR                            |
| Analytic and marketing tool providers  | Access data  | Processing on behalf of a controller (Art. 28 GDPR) |
| Payment and delivery agents  | Personal master data, address data, contact data, payment data | Processing on behalf of a controller (Art. 28 GDPR) |

## 2.4 Newsletter subscriptions

The tables below show how your data is processed when you subscribe to a newsletter:

### 2.4.1 Purposes of data processing, legal basis, legitimate interests (where applicable)

| <b>Data category</b>         | <b>Intended purposes</b>  | <b>Legal basis</b>              | <b>Legitimate interest, where applicable</b>  |
|------------------------------|---|---------------------------------|---|
| Contact data                 | Verification of the application, sending of the newsletter  | Art. 6, subs. 1 b), GDPR        |   |
| Personal master data         | Personalisation of newsletter   | Art. 6, subs. 1 b), GDPR        |   |
| Login data                   | Traceability of newsletter registration / confirmation / deregistration                                       | Art. 6, subs. 1 b), f), GDPR    | Proof of successful newsletter registration / deregistration, Improvement and development of services, own marketing and promotional activities |
| Access data                  | Generating newsletter user profile data   | Art. 6, subs. 1 b), f), a) GDPR | Improvement and development of services, own marketing and promotional activities   |
| Newsletter user profile data | Reflection of interests in the composition of the newsletter (profiling) and inclusion of personalized offers | Art. 6, subs. 1 b), f), a) GDPR | Improvement and development of services, own marketing and promotional activities   |

## 2.4.2 Recipients

| <b>Recipient category</b>                 | <b>Data concerned</b>   | <b>Legal basis</b>                                  |
|---|-------------------------|---|
| Newsletter distribution service providers | All data listed in 2.4. | Processing on behalf of a controller (Art. 28 GDPR) |

## 2.5 Contests and promotional actions

The tables below indicate how your data is processed when you enter prize draws or take part in promotions (e.g., events, polls, competitions).

### 2.5.1 Purposes of data processing, legal basis, legitimate interests (where applicable)

| Data category  | Intended purposes   | Legal basis              |
|--|---|--------------------------|
| Personal master data   | Identification, age verification  | Art. 6, subs. 1 b), GDPR |
| Address data   | Establishment of contact  | Art. 6, subs. 1 b), GDPR |
| Contact data   | Establishment of contact  | Art. 6, subs. 1 b), GDPR |
| Where applicable (according to the terms and conditions in any given case), answering of competition questions, provision of application information, voting information | Execution of the relevant prize draw / promotion, selection of winners / entrants | Art. 6, subs. 1 b), GDPR |

### 2.5.2 Recipients

| Recipient category                     | Data concerned                     | Legal basis  |
|--|------------------------------------|--|
| Contests / promotion service providers | All data listed under 2.5.         | Processing on behalf of a controller, Art. 28 GDPR |
| Delivery agents                        | Personal master data, address data | Processing on behalf of a controller, Art. 28 GDPR |

## 2.6 Tracking (COOKIES)

The passages below explain how your personal data are processed with the help of tracking technologies to analyse and optimise our services and to serve promotional purposes.

**The explanation of the tracking methods also includes information on how to prevent or object to the processing of data.**

### COOKIES

#### Tracking for Service facilitation and improvement and advertisement optimisation

##### 2.6.1 Definition and use

A "cookie" is a small data file stored by your Web browser on your computer or mobile device (in the following "hardware"). It allows us to recognize your hardware upon entering our site by associating the identification numbers in the cookie with other customer information you have provided us. That customer information is stored securely in our database. We use cookies to keep track of how many pages you visit, which language you use, what you have in your shopping cart, the number of new users, the frequency and duration of your visits, and the online Navigator used to access. We use this information to improve our site design, product assortments, customer service, and special promotions.

You can, of course, disable cookies on your computer by indicating this in the preferences or options menus in your browser. However, in order to sign up for your customer login, you need to enable cookies in your browser and it is possible that some parts of our website will not operate correctly if you disable cookies. We may also use "web beacons" or "clear gif" which are typically a one-pixel image, used to pass information from your computer or mobile device to a website, and other technologies, to help track whether our communications are reaching you, to measure their effectiveness, or to collect certain non-personal information about your computer, device, or browser in order to allow us to better design future communications to you.

Below you will find a list of cookies we use on our website and a brief description and purpose of each:

Cookies applied on the website [www.artiggallery.com](http://www.artiggallery.com):

- user input cookies,
- authentication cookies,
- security cookies,
- media session cookies,

- interface customization cookies,

## 2.6.2 Third Party Cookies:

- Google Analytics

This website uses Google Analytics, a web analysis service by Google Inc. ("Google"). Google Analytics uses cookies. The information generated by the cookie concerning your use of the website is usually sent to a Google server and stored there. When the IP anonymisation on this website is activated, your IP address is first shortened by Google in the member states of the European Union or in other states that are party to the agreement on the European Economic Area. In exceptional cases, the full IP address is sent to a Google server and shortened there. Google uses this information at the request of the operator of this website to evaluate your use of the website, compile reports on website activities and provide additional services concerning website use and Internet use to the operator of this website. The IP address sent by your browser as part of the Google Analytics process will not be combined with other Google data. You can prevent storage of the cookies by appropriate settings of your browser. Please take note that in this case you might not be able to use all the functions of this website. Furthermore, you can prevent the transmission to Google of data created by the cookie concerning your use of this website as well as the processing of these data by Google by downloading and installing the Link Available Browser-Plugin:

<https://tools.google.com/dlpage/gaoptout?hl=en> www.artiggallery.com uses the following Google Analytics Advertising Features: Remarketing with Google Analytics, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting. You can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads by following Google's privacy ads instructions: <http://www.google.com/policies/technologies/ads/>

- \_utm\* . Purpose: Remarketing with Google Analytics, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting  
Provider: Google Analytics Cookie
- Fb\*. Provider: Facebook
- \_insp\_sid - session cookie, deleted when visit is over
- \_insp\_ref - session cookie, deleted when visit is over

- `_insp_scpt` - session cookie, deleted when visit is over
- `_insp_nv` - session cookie, deleted when visit is over
- `_insp_wid` - session cookie, deleted when visit is over
- `_insp_identity` - session cookie, deleted when visit is over
- `_insp_uid` - long-term cookie that contains random ID assigned to visitor  
Provider: Inspectlet

#### Magento Standard Cookies:

- `USER_ALLOWED_SAVE_COOKIE`  
Purpose: Indicates if a customer is allowed to use cookies.
- `external_no_cache`  
Purpose: A flag that indicates if caching is disabled.
- `persistent_shopping_cart`  
Purpose: The session key.
- `Stf`  
Purpose: If product links were sent to friends, stores the timestamps in the format: `$timeStamp1,$timestamp2, ..., $timestampN`.
- `pollN`  
Purpose: A poll ID that indicates if a vote has occurred.
- `frontend`  
Purpose: Session ID
- `guest-view`  
Purpose: Allows guests to edit their orders.

Those files provide us and our trusted processors with analytic and statistical information regarding the use of our services. This information may be used in order to ensure proper authentication and ease of use of our services (art. 6 subsec. 1 b GDPR). In this respect we process data that they provide in order to perform our contractual obligations arising under service agreements (and if you are not a registered user, in order to protect our legitimate interest, art. 6 subsec. 1 f) GDPR).

Cookies and tracking technologies also provide us and our trusted processors with pseudonymised data (*i.e.* data that does not allow for your identification) that is further used in order to plan marketing strategies and optimise advertisement display. In this respect your personal data is processed by us under art. 6 subsec. 1 f) GDPR (*i.e.* in pursuit of our legitimate interest).

Our tracking technologies may allow for the observation of *i.a.* how and when our website is used, what products are being browsed, which websites led the person to

our websites (which websites referred you to us) and which website we referred you to (exit websites), as well as observation of how our websites are interacted with.

### 2.6.3 Tracking for the purpose of personalised newsletter

- If you use our personalised newsletter service (having willingly subscribed to it by granting a separate consent at registration, or by subscribing to it without registration), we will do our best to provide you with a newsletter that contains information that is specifically tailored to your interests and preferences if applies. In order to achieve this goal we may use cookies and other tracking technologies that track your activity while using the Website and subsequently report that information to our newsletter service provider. The newsletter service provider then combines that information with your e-mail in order to provide you with a newsletter that contains information and offers (including discounts) tailored specifically for you, on the basis of your Website activity.
- You may resign from receiving this type of newsletter at any time, by e-mailing us to [info@artiggallery.com](mailto:info@artiggallery.com) or by clicking or copying this link in your browser to unsubscribe: <https://artiggallery.us13.list-manage.com/unsubscribe?u=074dc7a8e2a119d4a98139369&id=5aa76a1968>

### 2.6.4 Disabling cookies

In general, you may disable the storage and use of cookies *via* the tools provided available in your browser (usually found under the “options”, “settings” or “preferences” tabs).

There are also third-party services available that allow for identification and management of cookies such as <http://www.youronlinechoices.com/>. Before using any such service please make sure that you acquaint yourself with its terms and conditions as well as privacy policy.

#### **Mange Cookies according to your Browser**

To manage your Cookies and your options, the settings of each browser are different. For more information, go to the help menu of your browser, where you will find where to edit your choices with regards to Cookies. The following instructions depend on the development of each browser and we cannot guarantee to always publish the latest updated version.

- **Internet Explorer:** Rejecting cookies: Click on “Tools” then on “Internet options”. Click on “Privacy” and the Privacy Settings tab allows you to control which types of cookies Internet Explorer accepts and configure the Pop-up

Blocker. Adjusting cookie settings for IE Privacy involves moving the slider to adjust general cookie settings, or clicking the Sites, Import, Advanced, or Default buttons to set specific rules for cookie handling. Delete your cookies: Click on “Tools” then on “Internet options”. Click on “Privacy” and, in the “General” tab, under “Browsing History”, click on “Delete”. Select “Cookies and website data” then click “Delete”.

- **Chrome:** Rejecting cookies: In the Chrome menu, choose “Settings”. Open “Advanced settings”. Go to the “Privacy” section. Click on “Content settings”. Under “Cookies” (first section), you can choose to “Allow local data to be set”, to “Keep local data only until you quit your browser”, to “Block sites from setting any data”, or to “Block third-party cookies and site data”. Delete your cookies: In the Chrome menu, choose “Settings”. Open “Advanced settings”. Go to the “Privacy” section. Click on “Content settings”. Click on “All cookies and site data”. Find the cookies that you want to delete and click ‘OK’. You can also choose to delete all of your cookies.
- **Firefox:** Rejecting cookies: In the Firefox menu, go to “Tools” then “Options”. On the “Privacy” tab, choose “Use custom settings for history”. You can choose to accept cookies and third-party cookies. Delete your cookies: In the Firefox menu, go to “Tools” then “Options”. On the “Privacy” tab, choose “Use custom settings for history”. Click on “Show cookies”, then on “Remove individual cookies”. Look for the cookies that you want to delete and click on “Remove cookie”.
- **Opera:** Rejecting cookies: Select Opera > Quick Preferences and uncheck "Enable Cookies". Delete cookies: Select Opera > Preferences > Advanced > Cookies and check "Delete new cookies when exiting Opera" and close Opera when you have finished browsing.
- **Safari:** Rejecting cookies: In the Safari menu, choose “Preferences” and then click “Privacy”. In the “Block cookies” section, specify whether Safari should accept cookies from websites, and when. To see an explanation of the options, click the Help button (looks like a question mark). If you want to see which websites store cookies are on your computer, click on “Details”. Delete your cookies: In the Safari menu, choose “Preferences” and then click "Security". Click on “Show Cookies”. In the window that opens, find and select the cookies that you want to delete and click “Remove”.

## 2.7 Social media plug-ins

This website may contain plug-ins from social networks such as Facebook, Google+, Instagram, which are operated by third parties and which feature a button via which messages can be sent to the corresponding social network for various purposes, such as rating, recommending or sharing content. Our purpose and legitimate interest in this course of action is to publicise our services to greater effect. We configure our services in such a way that data are only sent if you press the button. The legal basis for data transmission in this case is Art. 6, subs. 1 f), GDPR. The respective provider is responsible for the privacy-compliant processing of the transmitted data.

## **Facebook**

www.artiggallery.com can integrate the social network plugins of the social media network Facebook.com, 1601 South California Avenue, Palo Alto, CA 94304, USA (“Facebook”). The plugins are identified by a Facebook logo or the add-on “Facebook Social Plugin”.

When you visit an Artig Gallery website that contains such a plugin, the plugin establishes a direct link between your browser and the Facebook server and informs Facebook that you have visited our site using your IP address. When you click the Facebook plugin while you are logged in on your Facebook account, you will be able to link the content of the Artig Gallery webpages to your Facebook profile. Facebook can then attribute your visit to www.artiggallery.com to your user account. Please note that we, the providers of the pages, receive no information concerning either the content of the data transmitted or their use by Facebook. Additional information is provided in the data protection declaration of Facebook, which can be accessed here. If you do not want Facebook to attribute your visit to www.artiggallery.com to your Facebook user account, please log out of your Facebook user account. Facebook data policy under <https://www.facebook.com/policy.php> Artig Gallery cannot be held responsible for the content and the comments Facebook users might publish on the Artig Gallery Facebook page. Facebook users guarantee that their content does not violate nor harm the rights of others. Therefore, Artig Gallery cannot be held accountable by Facebook users or third parties and is only responsible for any harm or damage that can be directly derived from the content published by Artig Gallery.

## **3 Rights of data subjects**

### **3.1 Right to object**

**If we process your personal data for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing with future effect, which includes profiling to the extent that it is related to such direct marketing.**

You also have the right, at any time with future effect and for reasons relating to your particular situation, to object to the processing of personal data concerning you which is based on Art. 6, subs. 1 e) or f), GDPR, including profiling based on these provisions.

The right to object may be exercised free of charge by contacting us:

**Via Mail to: [info@artigallery.com](mailto:info@artigallery.com)**

**Via Phone: +34 935 340 805**

### **3.2 Right of access**

You have the right to obtain confirmation from us as to whether or not personal data concerning you are being processed and, where that is the case, access to the personal data and the other information listed in Art. 15 GDPR.

### **3.3 Right to rectification**

You have the right to obtain from us the rectification of inaccurate personal data concerning you without undue delay (Art. 16 GDPR). Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### **3.4 Right to erasure ("right to be forgotten")**

You have the right to obtain from us the erasure of personal data concerning you without undue delay if one of the reasons listed in Art. 17, subs. 1, GDPR is applicable and the processing operations are not required for one of the purposes approved in Art. 17, subs. 3, GDPR.

### **3.5 Right to restriction of processing**

You are entitled to obtain from us the restriction of the processing of personal data if one of the conditions laid down in Art. 18, subs. 1 a) to d), GDPR is met.

### **3.6 Right to data portability**

Under the conditions set out in Art. 20, subs. 1, GDPR, you have the right to receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance on our part. In exercising your right to data portability, you have the right to have the personal data transmitted directly by us to another controller where technically feasible.

### **3.7 Right to withdraw consent**

If the processing is based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

### **3.8 Right to lodge a complaint**

You have the right to lodge a complaint with the supervisory authority responsible for Artig Gallery. The supervisory authority responsible for us is<sup>1</sup>:

**Artig Gallery**  
**Att: Greta Schindler**  
**Calle Sant Elies 21, SA2**  
**08006 Barcelona, Spain**

Future updates and changes of this cookie policy

We may update this Cookie Policy from time to time to comply with changes of law and regulations. An updated version will always be available on our Website. All updates will be effective immediately after its publication. When significant changes in this policy are made, users will be informed directly either through the website or through email to registered users.

Any other questions?

We'll be happy to provide additional information or answer any questions. Please write to: [info@artiggallery.com](mailto:info@artiggallery.com).

**Updated: May 2018**

**Sincerely,  
Artig Gallery**

---

<sup>1</sup> This information is provided on the basis of draft legislation being processed by the Parliament at the time of this document's publication and may be subject to change.