

## **PRIVACY NOTICE**

Thank you for visiting and using our websites and our social media pages ("Sites").

This Notice explains how and for what purposes we use the information collected about you through our Sites, via our advertising campaigns, our offline programs or events.

### 1. SCOPE OF THIS PRIVACY NOTICE AND YOUR CONSENT

By using our Sites or by giving us your personal data, you accept the practices described in this Privacy Notice. If you do not agree to this Privacy Notice, please refrain from using or visiting our Sites or providing personal data.

ELNA reserves the right to make changes to this Privacy Notice at any time. The changes will be effective when posted on this Site and we will provide you reasonable notice of any material change but please review it regularly.

#### 2. WHAT PERSONAL DATA WE COLLECT ABOUT YOU

We only collect personal information that is necessary for a specific purpose or that you provide to us with your consent, based on clear actions and behaviours on our Sites or for a legitimate reason:

- Personal contact information, such as name, first name, full address and e-mail address, telephone number, picture, gender or geographic location;
- Information linked to your orders and purchases placed on our e-shop, through our authorized retailers or in our physical stores;
- Payment information, credit cards and billing addresses;
- Your comments and user-generated content, including any photos, videos and personal stories that you share with us.
- Your profiles on social networks;
- Your preferences regarding our products.

We also use cookies and other tracking technology which collect certain kinds of information when you interact with our sites or open our emails, such as IP addresses, devices or browsing preferences.

We may collect personal data about you from third party data aggregators (e.g. Google), promotional partners, public sources and third party social networking sites. Such information may include personal data as part of your profile on a third party social network and that you allow that third party to share with us, pursuant to their rules.

# 3. WHY DO WE COLLECT PERSONAL DATA AND USE IT

We may collect and use your personal data for a number of purposes, including:

- to fulfil your orders and purchases on a contractual basis;
- to answer your questions or share them with our partners so that they respond to you in your language or in relation to your country of residence;
- to contact you for marketing purposes with your consent or based on a previous purchase;
- to combine with information we receive from third party to help understand your needs and to provide you with better service, including customizing sites and serving you interest-based advertising;
- to offer you sewing classes or tutorials, for after-sales service, according to your requests;
- for security and maintenance of our Sites; for reporting; and for risk, dispute and record management.



### 4. WITH WHOM DO WE SHARE PERSONAL DATA

We may disclose your personal information to our commercial partners:

- Affiliate companies to ELNA offering our products and services locally and responding to requests related to a specific territory;
- Local distributors and retailers, for the same reasons;
- Service providers, such as our customer data hosting provider, marketing agencies using CRM and analytics solutions or tools for warranty management and other services for our customers, or authorities.

We require that these third parties, who may be based outside the country from which you accessed our Sites, comply with all laws relating to personal data. If we were to use services located in the USA (in particular for analytical purposes), we undertake to regularly review the measures of compliance with Swiss and European requirements.

# 5. HOW DO WE STORE, SECURE AND RETAIN DATA

We take all reasonable technical and organisational measures to protect the personal data we hold against loss, unauthorised access or disclosure and against other misuse. Your personal data will not be sold or disclosed to any other third parties except as provided in the Privacy Notice.

When the personal data that we collect is no longer required for the given purpose, or for legal requirements, we destroy or delete it in a secure manner. In particular, we keep your personal data in connection with the warranty of your machine until the said warranty has expired.

### 6. YOUR RIGHTS

You can request access to the personal data we hold about you by contacting us at <a href="mailto:info@elna.com">info@elna.com</a>. You have the right to tell us if you would like to withdraw your consent, correct, update or delete your personal data in our records. To assist us in dealing with your request, please provide your full name and details.

You may opt-out at any time from marketing communications by following the 'opt-out' options provided in our communications or by contacting us (info@elna.com).

You may also limit the use of tracking technologies (such as cookies for which you can set your browser to warn you before accepting them, or you can simply set it to refuse them).

ELNA International Corp. SA, registered in Switzerland acts as "data controller" for the personal data it processes in the framework of this Privacy Notice. Please contact us by phone at ++41 884 86 66; email at <a href="mailto:info@elna.com">info@elna.com</a>, regular mail at Rue de Veyrot 14, 1217 Meyrin, Switzerland.

You also have the right to file a complaint to your data protection supervisory authority at any time.

ELNA International Corp. SA 2022