



## **Privacy Policy**

#### 1. Controller Information

The Controller of personal data processed on the website <a href="www.brandner.ee">www.brandner.ee</a> is Brandner Electronics Ltd.

Registry code: 17117350

Address: Tööstuse 17, 72720 Paide, Estonia

Phone: +372 38 46320 E-mail: sales@brandner.ee

#### 2. General Information

Brandner Electronics Ltd business activities primarily involve cooperation with legal entities. According to the General Data Protection Regulation (GDPR), processing data of legal entities is generally not regarded as processing of personal data under Article 4.

Therefore, any processing of personal data by Brandner Electronics Ltd is incidental and small-scale. When processing personal data, Brandner Electronics Ltd complies with the GDPR, the <u>Personal Data Protection Act of Estonia</u>, and other applicable laws.

## 3. Categories of Personal Data, Purposes, and Legal Basis for Processing

We process personal data only for specific and lawful purposes, in accordance with the General Data Protection Regulation (GDPR). The following overview summarises the main purposes of processing, the types of data involved, and the applicable legal basis under <a href="Article 6">Article 6</a> GDPR.

1. To conclude and perform contracts with customers.

We process names, contact details (such as phone numbers and e-mail addresses), order details, and postal addresses.

Legal basis:

Article 6(1)(b) – processing is necessary for the performance of a contract.

**2.** To issue invoices and manage payments.

We process names, addresses, e-mail addresses, and phone numbers to ensure proper invoicing and payment management.

Legal basis:

Article 6(1)(b) – contract performance.

**3.** To communicate about ongoing projects, deliveries, or support.

We process names, e-mail addresses, and phone numbers to provide updates, technical support, or delivery-related information.

Legal basis:

Article 6(1)(b) – contract performance and Article 6(1)(f) – legitimate interest.

**4.** To send marketing offers and newsletters.

We process names and e-mail addresses to share news, product updates, and promotional offers. Legal basis:

Article 6(1)(a) – consent (for natural persons); or

Article 6(1)(f) – legitimate interest (for business contacts).

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# **Brandner**

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**5.** To improve our products and services.

We process non-sensitive order and purchase data to enhance the quality and functionality of our products and services.

Legal basis:

Article 6(1)(f) – legitimate interest.

**6.** To manage transportation and delivery.

We process names, addresses, and phone numbers to arrange shipments and ensure timely delivery of goods.

Legal basis:

Article 6(1)(b) – contract performance.

## 4. Recipients of Personal Data

We only share personal data when necessary to provide our services or comply with legal obligations. Your data may be shared with:

- Payment service provider: Nets Estonia Ltd. (Brandner Electronics Ltd does not store credit card data).
- Transportation companies: for delivery of ordered goods.
- Accounting and legal service providers: where required by law.

All recipients process data under appropriate data processing agreements (DPAs) ensuring compliance with GDPR.

We do not transfer personal data outside the EU/<u>EEA</u>. If such transfers become necessary, we will ensure compliance through Standard Contractual Clauses (SCCs) or an Adequacy Decision.

## 5. Marketing Communications (Newsletter and Offers)

We send newsletters and offers to our existing customers and business partners based on legitimate interest.

If you are a natural person, we will send such communications only with your explicit consent.

• You can withdraw consent or unsubscribe at any time, free of charge, by clicking the unsubscribe link in the e-mail or by contacting us at sales@brandner.ee

## 6. Retention of Personal Data

We retain personal data only as long as necessary for the purposes it was collected or as required by law.

- Data related to contracts and customer relationships: retained for the duration of the relationship, then deleted within 12 months after termination.
- Data related to fiscal documents: retained for 7 years after the year of the respective transaction, in accordance with accounting law.
- Marketing data (newsletter subscriptions): retained until consent is withdrawn or no activity is detected for 24 months.

After these periods, data is securely deleted or anonymised.

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#### 7. Data Subject Rights

Under GDPR, you have the following rights regarding your personal data:

- Access to obtain information about the data we hold about you.
- Rectification to correct inaccurate or incomplete data.
- Erasure ("Right to be Forgotten") to request deletion of your data where permitted by law.
- Restriction to limit how we use your data.
- Data Portability to receive your data in a structured, commonly used format.
- Objection to object to processing based on legitimate interests or for marketing purposes.
- Withdrawal of Consent to withdraw your consent at any time, where processing is based on consent.

To exercise these rights, contact us at <a href="mailto:sales@brandner.ee">sales@brandner.ee</a> We will respond within 30 days as required by GDPR.

If you are unsatisfied with our response, you may lodge a complaint with the Estonian Data Protection Inspectorate: www.aki.ee

# 8. Security of Personal Data

We apply appropriate technical and organisational measures to protect personal data from unauthorised access, alteration, disclosure, or destruction.

These include:

- Secure servers and encrypted connections (HTTPS).
- Access control and password protection.
- · Regular backups and updates.
- Staff training on data protection.

## 9. Updates to This Privacy Policy

We may update this Privacy Policy from time to time to reflect legal or operational changes. The latest version is always available on our website at <a href="https://www.brandner.ee">www.brandner.ee</a>

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