

Privacy policy

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EDUNTAGE LIMITED, reg. № **09739022**, address: Suite 12, 2nd Floor, Queens House, 180 Tottenham Court Road, London, W1T 7PD (hereinafter – EDUNTAGE), pursuant to the Regulation (EU) 2016/679 of the European Parliament and of the Council (ES) 2016/679 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 (hereinafter – Regulation), worked out this Privacy policy for the <https://creativedepotco.com/> online store (hereinafter - <https://creativedepotco.com/>).

Purpose of the privacy policy is to provide customer of EDUNTAGE– natural person with information on the Personal data types, purpose of processing, procedure and scope, as well as the rights of the natural person as data subject.

Personal data are any information (written, audio, video, electronic) directly or indirectly relating to the natural person, which refers to an identified or identifiable natural person, such as a name, surname, date of birth, phone number, mail and e-mail address, photo, one or more typical economic factors of the physical person, as well as other information which allows identification of the natural person (hereinafter – Personal data).

This Privacy policy shall be applied to processing of Personal data regardless of the form used by the natural person to provide his/her Personal data: paper form, verbal or electronic.

This Privacy policy refers to the existing customers registered in the internet stores <https://creativedepotco.com/> and potential customers (hereinafter - the Customers), as well as Customers, who are visiting our business site in social networks, for example, Facebook, Instagram.

1. Basic information on controller

Controller: EDUNTAGE LIMITED

Reg. No. 09739022

e-mail address: eduntagellc@gmail.com

Purpose of Personal data processing: signing contracts on purchase of goods, performance of delivery of goods, administration of payments, performance of guarantee obligations, customer servicing and ensuring of participation in loyalty (customer) program, maintenance and improvement of operation of the website and internet store.

2. Forms of Personal data and purposes of processing thereof

EDUNTAGE shall process the following Personal data of the Customers for the following purposes:

Purpose	Form of personal data
Customer registration and authentication for the use of Internet store:	name, surname, e-mail, phone and password
Purchase of goods and delivery thereof after making of order in the Internet store:	residence and/or location address, contact information, name, surname, information on the form of payment, form of payment for the goods and similar financial information
For the purposes of financial accounts of EDUNTAGE, for example, accounting:	history of orders, payment details, information on delivery
For the purpose of development of commercial activities of EDUNTAGE, promotion of goods and services and marketing activities, including with the purpose of adjusting functioning of the website, and sending commercial notices on the purchasing habits of the Customer	name, surname, contact information, gender, date of birth, purchasing habits, information and habits of use of the website and internet store, pictures, video, IP address, geo-location information, Personal data processed using cookies (detailed information is available in the Cookie policy).
Meeting requirements of laws and regulations, including but not only providing information to the state	all previously specified Personal data

authorities, for example, State Revenue Service:	
Storing documents in the archive:	all Personal data, required for the performance of the obligation of EDUNTAGE specified in the laws and regulations.

3. Legal grounds for processing of Personal data

EDUNTAGE shall perform processing of Personal data, if:

1) Processing of Personal data of the Customer is required for execution or signing of a contract (upon purchasing of goods, it is deemed that a contract has been signed between EDUNTAGE and the Customer). For example, processing of the delivery address is required for the delivery of goods. If the Customer does not provide EDUNTAGE with the Personal data required for execution of the contract, EDUNTAGE will not be able to execute the contract. Whereas request to present personal identification document at the moment of receiving of the goods purchased in the internet store is related to the necessity to verify the person of the receiver.

2) Processing of Personal data of the Customer is required to meet the legal obligations, specified in the laws and regulations as attributable to EDUNTAGE, for example, to ensure provision of Customer information to state authorities for the purpose of meeting the obligation of management of accountancy documents.

3) Processing of Personal data is required for ensuring legitimate interests of EDUNTAGE or third parties, for example, to investigate cases when complaints have been received regarding quality of the goods, to improve provision of services.

4) Consent of the Customer for processing of Personal data has been received for the purpose of development of commercial activities of EDUNTAGE, promotion of goods and services and marketing activities, including with the purpose of adjusting functioning of the website, and sending commercial notices on the

purchasing habits of the Customer. For example, consent of the Customer is needed to use the Personal data acquired through cookies in the website, and observation of the habits of use of the internet store. Such data as gender, date of birth, purchasing habits, information and habits of use of the website, pictures, video and other information shall be used on the basis of the consent for the purposes specified in this clause.

4. Recipients of Personal data

EDUNTAGE may forward Personal data of the Customer to the following recipients of Personal data, unless that contradicts the applicable laws and regulations:

- in cases specified in the law, if that is requested by any of the state authorities and authorised institutions, sworn notaries and bailiffs.
- to persons related to functioning and business development of EDUNTAGE enterprise, including, but not limited to providers of data storage services, providers of advertising and marketing and other services, which are related to performance of obligations of EDUNTAGE in regard to orders made in the internet store, for example, couriers, other mail and delivery service providers, providers of accountancy and financial services, including provision of leasing services to the Customer, including but not limited to: legal consultants, financial consultants and auditors, providers of communication, mail and IT technologies. In such cases EDUNTAGE shall provide or receive from third parties Personal data of the Customer to such scope as required for the provision of the relevant service or activity.

5. Scope and term of Personal data processing

Personal data of the Customer shall be processed to the extent reasonably required in conformity with framework of the applicable laws and regulations.

EDUNTAGE shall store Personal data of the Customers within the framework of the term specified in the law and until the aforementioned purposes of Personal data processing will be accomplished.

EDUNTAGE shall process Personal data, as long as at least one of the criteria below shall be met:

- 1) contract signed between EDUNTAGE and the Customer is effective;
- 2) pursuant to the procedure stipulated in the applicable laws and regulations EDUNTAGE or the Customer may implement its legitimate interests (for example, submit objections or claims, or to sustain petition at court);

3) EDUNTAGE has legal obligation to store Personal data;

4) Consent of the Customer for the relevant processing of Personal data is effective, unless there are any other legal grounds for processing of Personal data.

If none of the criteria specified in this clause are met, Personal data shall be deleted.

6. Transfer of Personal data outside of the European Union

Personal data shall not be transferred outside of the European Union.

7. Rights of the Customer within the framework of Personal data processing

- rights to access one's own personal data – the Customer shall be entitled to receive information relating to the purpose, legal grounds and form of Personal data processing, corrections, deletion or blocking of Personal data, Personal data source and other information pursuant to the laws and regulations;
- rights to correct one's own personal data – the Customer shall be entitled to request correction of his/her personal data, if these are inappropriate, incomplete or incorrect;
- rights to object to data processing – the Customer shall be entitled to submit objections related to processing of his/her Personal data, if use of the Personal data is substantiated with marketing purposes, for example, receiving of marketing offers;
- rights to withdraw consent – the Customer shall be entitled to withdraw his/her consent to Personal data processing in such cases, when the consent is the grounds for processing of Personal data. Withdrawal of the consent shall not affect and terminate processing of the personal data, which is performed in accordance and/or based on other legal grounds. The Customer may use the contact information of the Controller specified in this document for the purpose of withdrawal of the consent. If the Customer withdraws his/her consent, including for the use of cookies, EDUNTAGE shall be entitled to limit functionality and scope of its services, including within the framework of operation of the website and the Internet store. In such cases EDUNTAGE will not be able to provide relevant services to the Customer, if EDUNTAGE will not have the Personal data required to ensure services and/or functionality due to withdrawal of the consent.
- rights to be forgotten – the Customer shall be entitled to demand deletion of his/her personal data, unless this contradicts the requirements of the laws, for example, if personal data are processed on the basis of the consent

previously given by the Customer, and if the Customer has withdrawn his consent. These rights shall not be effective if personal data, deletion of which has been demanded, are being processed in accordance with the requirements of the laws and regulations;

- rights to submit complaints – the Customer shall be entitled to submit complaints regarding processing of his/her personal data to EDUNTAGE and Data State Inspectorate, if the Customer believes that processing of his/her personal data violates the rights of the Customers, specified in the laws and regulations;
- other rights specified in accordance with the Regulation.

8. Automated processing of Personal data

Personal data of the Customer may be automatically processed for the purpose of development of commercial activities of EDUNTAGE, promotion of goods and services and marketing activities, including with the purpose of adjusting functioning of the website, and sending commercial notices on the purchasing habits of the Customer. Namely, EDUNTAGE may analyse the data on visiting and use of the website and internet store to offer advertisements, goods, services, discounts or participation in certain campaigns to the Customer in accordance with his/her habits and interests.

9. Information on Personal data processing

The Customer may address EDUNTAGE in relation to personal data processing (in relation to questions, provision or withdrawal of consent, use of his/her rights and complaints on the use of personal data), by sending his/her inquiries to e-mail: eduntagellc@gmail.com with subject “Personal data processing”.