

Privacy policy

Customers, potential customers and newsletter recipients at Flügger Poland Sp. z o.o.

At Flügger Poland ('Flügger'), we only process personal data required for the purposes for which it was collected. We make sure that we comply with data protection legislation, and it is important to us that you have confidence in our processing of your personal data.

In this privacy policy, you can read about our processing of your data as a customer, potential customer and newsletter recipient.

1. Data controller

The legal entity responsible for your personal data is:

Flügger Poland Sp. z o.o.
ul. Rakietowa 20A,

80-298 Gdańsk
NIP 585-020-55-30
Email: gdpr@flugger.com

If you have any questions about our processing of your personal data, you are always welcome to contact our legal department at the email address above.

2. Categories of personal data

The personal data we process about you as a customer or potential customer may include:

- identifying information, including name, company name, address, telephone number, email address, company registration number, Flügger customer number and, possibly, birthday
- purchase history
- payment history, payment details and credit rating
- information included in our correspondence with you
- social security number
- images/video
- Cookies and electronic traces

3. Purpose and legal basis

Our data processing has the following purpose and legal basis:

| Purpose | Legal basis |
|--|---|
| 1. Management of existing and potential customer relationships | |
| In connection with your orders and purchases, we process your identifying information, payment details, electronic traces from your purchases in the online shop and information included in our correspondence with you. | GDPR Article 6(1)(b) concerning processing necessary for entering into a contract and for the performance of a contract. |
| When granting credit to business customers (sole proprietors), we process identifying information, payment history and credit rating. | GDPR Article 6(1)(b) concerning processing necessary for entering into a contract and for the performance of a contract. |
| When granting credit to private customers, we use identifying information, payment history, credit rating and social security number. | GDPR Article 6(1)(b) concerning processing necessary for entering into a contract and for the performance of a contract, and section 11(2)(4) of the Danish Data Protection Act. |
| 2. Marketing, newsletters and general building of customer relationships | |
| For the purpose of building and developing existing and potential customer relationships, including sending out newsletters, we process identifying information, purchase history and information included in our correspondence with you. | GDPR Article 6(1)(f) concerning processing necessary for the purposes of legitimate interests that are not overridden by the interests of the data subject. The legitimate interests pursued by Flügger are the promotion of our business and provision to our customers of the best possible service and special offers. |
| 3. Video surveillance | |
| For preventive and safety reasons, Flügger has installed video surveillance on selected premises, which means that you may appear in video recordings, which are stored for up to 30 days. | GDPR Article 6(1)(f) concerning processing necessary for the purposes of legitimate interests that are not overridden by the interests of the data subject, and the section 8(3) of the Danish Data Protection Act. The legitimate interest pursued by Flügger here is the prevention and solving of crimes. |
| 4. Facebook and Instagram | |

When you visit Flügger's Facebook pages, data is collected about you for which Flügger and Facebook are joint controllers. The purpose of this processing is for Flügger to receive anonymised data from Facebook about visitors to our Facebook pages.

When you write to us through Facebook and Instagram, we will process the personal data included in our correspondence with you. The purpose is to be able to answer your enquiry.

The agreement between Flügger and Facebook can be read [here](#), and you can read about Facebook's processing of your data [here](#), and Instagram's [here](#).

GDPR Article 6(1)(f) concerning processing necessary for the purposes of legitimate interests that are not overridden by the interests of the data subject. The legitimate interest pursued by Flügger is insight into Facebook visitors as well as being able to respond to enquiries on Facebook and Instagram.

5. Cookies and electronic traces

When you visit our webpage cookies are placed, and we collect your IP address and data about your use of the webpage. Some cookies are necessary, while others have a functional, statistically or marketing purpose and can be selected or deselected in your cookie consent. Some information will be transferred to third parties.

You can read more about cookies and update or recall your Cookie consent in our Cookie policy below.

GDPR Article 6(1)(a) concerning processing the data subject has consented to and GDPR Article 6(1)(f) concerning processing necessary for the purposes of legitimate interests that are not overridden by the interests of the data subject. The legitimate interests pursued by Flügger are the interest in offering an interesting, relevant and functional webpage.

4. Categories of recipients

Flügger will only disclose information about you in strict compliance with the rules on processing of personal data and other Danish legislation. We will assess in each case whether such disclosure requires your explicit consent, or whether disclosure may take place on a different legal basis.

We disclose or make available personal data to the following categories of recipients:

- Our data processors based on data processing agreements
- Banks in connection with the administration of payments
- Debt collection and credit rating agencies when granting credit and in case of default on loans/credits

- Public authorities in connection with statutory reporting
- Collaborators who are independent data controllers
- Other companies in the Flügger group for administration and support purposes
- Flügger Franchise stores if you pick up your web shop order in a Franchise store

5. Transfer to third countries

In some cases, including when we provide support for our web services, your personal data may be transferred to data processors in countries outside the EU/EEA. We will only transfer personal data to data processors in countries that the European Commission considers to be safe third countries or data processors who have given the required data protection guarantees by way of the EU Commission's standard provisions.

If you want to know more about this processing, you can contact us by email at gdpr@flugger.com.

6. Deletion

We will delete the data about you when it is no longer required for the purposes for which it was processed.

In order to ensure correct handling of recurring customer relationships, potential complaints, warranty and bookkeeping obligations, and to be able to meet other obligations, we have ascertained that we need to retain the data for the current year plus up to five financial years from the end of the customer relationship.

For future and potential customers covered by marketing-related activities, we follow the applicable rules in the Polish Marketing Practices Act and comply with fair marketing practices.

7. Your rights

When we process your personal data, you have the following rights provided by law:

- You have the right to request access to and rectification or erasure of the data we process about you.
- You also have the right to request restriction of processing of your personal data or object against it, including and in particular in the case of profiling and direct marketing.
- In some cases, you have the right to receive personal data you have provided to us in a structured, commonly used and machine-readable format as well as to transmit the data to another data controller.

- If we process your personal data on the basis of your consent, you may withdraw your consent at any time.

If you wish to exercise any of these rights, please contact our legal department by email at gdpr@flugger.com. We will then assess whether it is possible to accommodate your request. You will receive our reply as soon as possible and no later than one month after we received your request.

If you are not satisfied with our reply, or if you disagree with the way your personal data has been processed, you can complain to the Danish Data Protection Agency. See how to contact the Data Protection Agency at www.datatilsynet.dk.

Version 2.1, updated April 2020.