

Feilo Sylvania Group Privacy Notice

May 2018

1. Background

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you.

It applies to all products and services, and instances where we collect your personal data.

This privacy notice applies to personal information processed by or on behalf of the Feilo Sylvania Group.

2. The Feilo Sylvania Group

The Feilo Sylvania Group is held by Feilo Malta Limited, (address). The Feilo Sylvania entity or entities which provide products or services to you are named at our website. The Feilo Sylvania entity that collects your data will be regarded as the Data Controller. You can contact the Data Controller using the details on our website.

3. What kinds of personal information about you do we process?

Personal information that we'll process in connection with all of our products and services, if relevant, includes:

- **Personal and contact details**, such as title, full name, contact details and contact details history
- **Your date of birth, gender and/or age**
- **Your nationality**, if needed for the product or service
- **Your company details**, if relevant for the supply of goods or services
- **Records of your contact with us** such as via the phone number and, if you get in touch with us online using our online services or via our smartphone app, details such as your mobile phone location data, IP address and MAC address
- **Products and services** you hold with us, as well as have been interested in and have held and the associated payment methods used
- **The usage of our products and services**, any purchase orders and invoices
- **Marketing to you and analysing data**, including history of those communications, whether you open them or click on links, and information about products or services we think you may be interested in, and analysing data to help target offers to you that we think are of interest or relevance to you.
- **Information about your use of products or services held with our business partners**, such as, financial services and products
- **Information we obtained from third parties with your consent**
- **Information about your property or site**, such as location, number of rooms, property type and installation work you've had done, photos of the site if relevant
- **Financial details about you**, such as your payment method(s)
- **Information we buy or rent from third parties**, including demographic information, details of outstanding finance, marketing lists, publicly available information, and information to help improve the relevance of our products and services
- **Insights about you and our customers** gained from analysis or profiling of customers, cookies, usage data

4. What is the source of your personal information?

We'll collect personal information from the following general sources:

- From you directly and from suppliers of products and services
- Information generated about you when you use our products and services
- From an agent or distributor who we work with to provide products or services or quote to you
- Feilo Sylvania Group companies if you already have bought a product with them, have applied for one
- Business partners (for example, financial services institutions) or others who are a part of providing your products and services or operating our business

- We buy or rent information about you or customers generally from third parties including demographic information, marketing lists, publicly available information and other information to help improve our products and services or our business

5. What do we use your personal data for?

We use your personal data, including any of the personal data listed in section 3 above, for the following purposes:

- Assessing an application for a product or service, including considering whether or not to offer you the product or service, the price, the risk of doing so, availability of payment method and the terms
- Managing products and services relating to that the product or service, or application for one
- Updating your records, tracing your whereabouts and recovering debt
- Managing any aspect of the product or service
- To make automated decisions on whether to offer you a product or service, or the price, payment method, risk or terms of it
- To perform and/or test the performance of, our products and services
- To improve the operation of our business and that of our business partners
- For management and auditing of our business operations including accounting
- To monitor and to keep records of our communications with you and our staff
- For market research and analysis and developing statistics
- For direct marketing communications and related profiling to help us to offer you relevant products and service, including deciding whether or not to offer you certain products and service. We'll send marketing to you by SMS, email, phone, post, social media and digital channels (for example, using Facebook Custom Audiences and Google Custom Match).
- To develop new products and services and to review and improve current products and services
- To comply with legal and regulatory obligations, requirements and guidance
- To provide insight and analysis of our customers both for ourselves and for the benefit of business partners either as part of providing products or services, helping us improve products or services, or to assess or improve the operating of our businesses
- To share information, as needed, with business partners (for example, financial services institutions), service providers or as part of providing and administering our products and services or operating our business
- To facilitate the sale of one or more parts of our business
- To enable other Feilo Sylvania Group companies to perform any of the above purposes

6. What are the legal grounds for our processing of your personal information (including when we share it with others)?

We rely on the following legal bases to use your personal data:

A. Where it is needed to provide you with our products or services, such as:

- Assessing an application for a product or service you hold with us, including consider whether or not to offer you the product, the price, the payment methods available and the conditions
- Managing products and services you hold with us, or an application for one
- Updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
- Sharing your personal information with business partners and services providers when you apply for a product to help manage your product
- All stages and activities relevant to managing the product or service including enquiry, order requests, supply and delivery, claims handling, warranty claims, administration and management of accounts
- For some of our profiling and other automated decision making to decide whether to offer you a product and/or service, particular payment method and the price or terms of this

B. Where it is in our legitimate interests to do so, such as:

- Managing your products and services relating to that, updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debt (where appropriate)
- Maintaining network and data security
- Assessing an application for a product or service you hold with us, including consider whether or not to offer you the product, the price, the payment methods available and the conditions
- To perform and/or test the performance of, our products and services
- To follow guidance and recommended best practice of government and regulatory bodies
- For management and audit of our business operations including accounting
- To carry out monitoring and to keep records of our communications with you and our staff (see below)
- For market research and analysis and developing statistics
- For direct marketing communications and related profiling to help us to offer you relevant products and services, including deciding whether or not to offer you certain products and services. We will send marketing to you by SMS, email, phone, post and social media and digital channels (for example, using Facebook Custom Audiences and Google Custom Match)
- To develop new products and services and to review and improve current products and services
- Subject to the appropriate controls, to provide insight and analysis of our customers to business partners either as part of providing products or services, helping us improve products or services, or to assess or to improve the operating of our businesses
- For some of our profiling and other automated decision making
- To facilitate the sale of one or more parts of our business
- Where we need to share your personal information with people or organisations in order to run our business

C. To comply with our legal obligations

- To comply with any of our legal and regulatory obligations, requirements and guidance, e.g. tax law, money laundering regulations, etc.
- Where we need to share your personal information with people or organisations in order to comply with any legal and/or regulatory obligations

D. With your consent or explicit consent:

- For some direct marketing communications
- For some of our profiling and other automated decision making

7. When do we share your personal information with other organisations?

We may share information with the following third parties for the purposes listed above:

- Feilo Sylvania Group companies and service providers
- Business partners (for example, financial services institutions, insurers) or others who are a part of providing your products and services or operating our business
- Governmental and regulatory bodies
- Other organisations and businesses who provide services to us such as debt recovery agencies, back up and server hosting providers, IT software and maintenance providers, document storage providers, suppliers of other back office functions and market research organisations who help us to develop and improve our products and services

8. How and when can you withdraw your consent?

Where we're relying upon your consent to process personal data, you can withdraw this at any time by contacting us.. Please note that the withdrawal of your consent does not affect the lawfulness of the processing carried out before such withdrawal.

9. Is your personal information transferred outside the EEA?

We are a global organisation covering mainly Europe, the Middle East and Africa (EMEA), Latin America (LATAM) and South East Asia. Our head office is based in Hungary and our supporting back offices are based in the UK and in Belgium. Your personal information may therefore be transferred outside the European Economic Area. If we do so we'll make sure that suitable safeguards are in place, for example by using approved contractual agreements, unless certain exceptions apply.

You may request copies of such safeguards by contacting us using the details below.

10. What should you do if your personal information changes?

You should tell us so that we can update our records.. We'll then update your records if we can.

11. Do you have to provide your personal information to us?

We're unable to provide you with our products or services if you do not provide certain information to us. In cases where providing some personal information is optional, we'll make this clear.

12. Do we do any monitoring involving processing of your personal information?

In this section monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person (face to face) meetings and other communications.

We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures and for quality control and staff training purposes. This information may be shared for the purposes described above.

13. For how long is your personal information retained by us?

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations
- For as long as we provide goods and/or services to you and then for as long as someone could bring a claim against us; and/or
- Retention periods in line with legal and regulatory requirements or guidance.

14. What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not. The right of data portability is only relevant from 25 May 2018.

- The right **to be informed** about the processing of your personal information
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**
- The right **to object** to processing of your personal information
- The right **to restrict processing** of your personal information
- The right **to have your personal information erased** (the "*right to be forgotten*")
- The right to **request access** to your personal information and to obtain information about how we process it
- The right to **move, copy or transfer your personal information** ("*data portability*")
- Rights in relation to **automated decision making which has a legal effect or otherwise significantly affects you**

If you feel that your personal data rights have been breached, you can also contact and lodge a complaint with the local data protection authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement. Please visit the following website for contact details of the Data Protection Authorities of the member states: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080. You can contact us using the details below.

15. Your right to object

You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us via info@sylvania-lighting.com to exercise these rights.

16. What are your marketing preferences and what do they mean?

We may use your home address, phone numbers, email address and social media or digital channels (for example, Facebook, Google and message facilities in other platforms) to contact you according to your marketing preferences. You can stop our marketing at any time by contacting us using the details below or by following the instructions in the communication.

17. Cookie Policy

The Feilo Sylvania Group uses Cookies. To learn more and for a detailed cookie notice, we refer to our [Cookie Policy](#).

18. Changes to this privacy notice

We may change this privacy notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this privacy notice for changes whenever you visit our website – <https://www.sylvania-lighting.com/>.

19. Contact Us

If you have any questions about this privacy notice, or if you wish to exercise your rights, you can contact us via info@sylvania-lighting.com