

Privacy Policy of Textiles y Confecciones Brownie, S.L.

BROWNIE takes the protection of your privacy and personal data very seriously. Your personal data is therefore kept secure and is processed with the utmost care.

This Privacy Policy regulates access to and use of the service (hereinafter, the "Service") that BROWNIE makes available to Users of the Services and Content hosted on its Website. The Website installs cookies that collect browsing data. We recommend that you read the Cookies Policy to find out more about cookies.

1. Who is the data controller?

The data controller is TEXTILES Y CONFECCIONES BROWNIE, S.L., (hereinafter, "BROWNIE"), with tax ID B-64713894, and with registered offices at Carrer Castanyer 29, 08022, Barcelona, Spain.

The owner of the domain name for our Website www.browniespain.com (hereinafter, the "Website") is BROWNIE.

Any person who accesses and/or uses this Website becomes a User (hereinafter, the "User") and is consequently subject to the data processing indicated in this Privacy Policy.

The User may contact BROWNIE by emailing info@browniespain.com

2. For what purposes does BROWNIE process your personal data?

Your personal data collected by BROWNIE may be used for the following purposes:

- i) to process product sales on the Website and deliver these products;
- ii) to send commercial communications from BROWNIE about its services by letter, telephone, email, SMS/MMS, push notification or by other similar means of electronic communication, provided that the User has consented to their personal data being processed for this purpose;
- iii) to manage and respond to any requests, comments, queries, complaints or claims that you may submit;
- iv) to create and manage user accounts;
- v) to comply with our legal and regulatory obligations, and to comply with any court judgments and other rulings by the authorities. This includes transferring your personal data to law enforcement forces and bodies where we suspect or where there are indications that you have acted illegally or committed an offence;
- vi) Sending surveys and questionnaires, as well as invitations to participate in review management platforms or online opinion communities, in order to assess your level of satisfaction, analyze it, and improve the quality of our products, services, and customer support;

vii) to analyse information about our interaction with you in order to improve engagement and/or to conduct studies and collect statistics to improve our Website, the way in which our company operates, our products and/or services, and our customer relationships and experiences.

3. On which legal bases does BROWNIE process your data?

BROWNIE processes data on the following legal bases:

i) when the data that you provide is processed in order to complete a purchase, the processing is on the basis of the performance of a contract to which the data subject is party or in order to take steps prior to entering into a contract (Article 6(1)(b) of the GDPR);

ii) when your data is processed in order to send you commercial information, the processing is on the basis of your consent (Article 21.1 of Law 34/2002 of 11 July 2002 on information society services and electronic contracting - LSSICE) and/or the legal consent laid down in Article 21.2 of the LSSICE. Commercial communications may also fall under the scope of legitimate interests (Article 6(1)(f) of the GDPR) and user consent (Article 6(1)(a) of the GDPR). Please note that you can opt out of receiving these communications at any time by clicking the unsubscribe link in any of the messages you receive;

iii) when your data is processed in order to manage and respond to any requests, comments and/or queries, the processing is on the basis of your consent, which is granted by you submitting your query and/or request (Article 6(1)(a) of the GDPR);

iv) when the data is processed in order to create and manage user accounts, the legal basis is the consent granted by the User when registering (Article 6(1)(a) of the GDPR);

v) when the data is processed in order to comply with our legal and regulatory obligations, any court judgments and any other rulings by the authorities, the legal basis is compliance with our legal obligations (Article 6(1)(c) of the GDPR);

vi) when your data is processed in order to analyse it to gauge user satisfaction levels, improve engagement and/or conduct studies and collect statistics to improve the way in which our company operates, our products and/or our services, the legal basis is our legitimate interests, which are to manage and improve our products and services (Article 6(1)(f) of the GDPR). Under no circumstances do our interests take precedence over your interests, rights and fundamental freedoms.

4. Truthfulness of the data provided by Users

The User warrants that the personal data they provide is true, and undertakes to inform BROWNIE of any changes to their data. The User will be liable, at all times, for the truthfulness of the data they provide. BROWNIE reserves the right to prevent any User who has provided false data from accessing the Services that they have registered for, without prejudice to further legal action being taken.

5. Recipients

Depending on the purposes for which the personal data have been collected, the following third parties may access them:

- (i) Public administrations, organisations and/or competent authorities and the relevant security forces and bodies, in cases where there is a requirement, a legal obligation or where we consider that there are sufficient indications and/or suspicions to be facing an illegal act or a criminal offence.
- (ii) Collaborators and third-party service providers that process information as data processors. With all our suppliers, the corresponding agreement for processing under contract has been signed in accordance with the personal data protection regulations. We inform you that one of our suppliers is Blueshift, a company that provides services for sending commercial communications.
- (iii) Review Manager. BROWNIE may send you invitations to rate our products and services through review managers or online opinion communities. Please note that the reviews and opinions you submit about our products and services through these platforms will be subject to the terms of use and privacy policy of the review manager. Once you leave a review or opinion, the manager will process your personal data for its own purposes as the data controller. Therefore, we recommend carefully reading the corresponding policies.

6. International transfers

BROWNIE, through its collaborators and third-party service providers, transfers personal data to countries outside the European Economic Area (E.E.A.). International data transfers that may be made have adequate protection of personal data through the use, in all cases, of adequate safeguards, especially the use of contractual clauses approved by the European Commission.

7. Data retention

The personal data you provide will be processed for the period necessary to fulfill the purposes established in this Privacy Policy, and will be stored for the period necessary to comply with the applicable legal and regulatory provisions, especially as regards the legal limitation periods and the legal periods for lodging, processing or defending claims.

The processing period is determined by the purpose of the processing and compliance with this purpose (e.g. in the case of consent, you may withdraw it at any time), while the obligatory retention periods are determined by our contractual and regulatory requirements.

8. The User's rights regarding their data

The User has the right to (i) access their personal data, (ii) have inaccurate data rectified, (iii) where applicable, have their data deleted, (iv) restrict the processing of their data, (v) object to the processing of their data, and (vi) request data portability.

In addition, the User may exercise their right to (vii) be forgotten.

If you have provided your consent, you may withdraw it whenever you wish without this affecting the lawfulness of the processing based on your consent and performed prior to its withdrawal.

The User may exercise all of these rights by emailing info@browniespain.com and stating the reason for their request, or by sending a written request to the data controller's postal address.

Notwithstanding any other administrative procedures or legal actions, the User will have the right to lodge a complaint with the Supervisory Authority in the event that they believe the processing of their personal data does not comply with the law, or in the event that they have been unable to exercise their rights. The Supervisory Authority to which the complaint is made will inform the claimant about the course and outcome of their complaint.

9. Data security

The protection of the User's privacy and personal data is very important to BROWNIE. BROWNIE has therefore implemented suitable technical and organisational measures to prevent data from being used inappropriately, by only permitting authorised personnel to access the data.

BROWNIE maintains levels of personal data protection security in accordance with the applicable legislation and has established all the appropriate technical means to prevent the loss, misuse, alteration, unauthorised access and theft of the data that the User submits during the relationship.

BROWNIE undertakes to fulfil its obligation to secrecy and confidentiality regarding personal data in accordance with the applicable legislation.

For those Services where the User needs to register, they must choose a password. The User is responsible for keeping their password secret, as well as for all activities that take place during the session launched under their username and password. The User undertakes to notify BROWNIE as soon as possible of the unauthorised use of their username and/or password or any other security breach. BROWNIE will not be liable for any loss or damage that may arise from the User's failure to comply with this obligation.

10. Questions

If you have any questions about this Privacy Policy or the processing of your data, please contact BROWNIE by emailing: info@browniespain.com

11. Changes

BROWNIE reserves the right to revise its Privacy Policy whenever it deems necessary. Therefore, please regularly check this Privacy Policy to read the latest version of it. Users will nevertheless be informed of any changes made to this Privacy Policy.

Text updated on 6 june 2022.