

I. General Information

The confidentiality of your personal data is one of the main concerns of **S.C. LUCOMMERCE S.R.L.**, headquartered in Timișoara, str. EPISCOP AUGUSTIN PACHA, No. 10, SAD 5, Staircase A, Floor 1, Timiș County, in its capacity as data controller. This document is intended to inform you about the processing of your personal data in the context of using the website www.athlox.ro.

II. Categories of Personal Data Processed

II.1. If you are a customer of the Site

www.athlox.ro will process your personal data, such as: name and surname, phone number, email address, billing address, delivery address, data regarding how you use the Site, for example your behavior/preferences/habits within **S.C. LUCOMMERCE S.R.L.**, as well as any other categories of data that you provide directly in the context of creating a user account, placing an order via the Site, or in any other way resulting from the use of the Site.

If you create your user account on the Site by using your Facebook or Google account, www.athlox.ro will process the following public profile data displayed by those applications: username, email address.

If you choose to create a user account only before completing the order of a product available on the Site, your email address will be requested, based on which an account will be automatically created. If you do not complete the order, the email address and any other provided data will not be stored by **S.C. LUCOMMERCE S.R.L.**, and the account created will be automatically deleted.

II.2. If you are a visitor of the Site

S.C. LUCOMMERCE S.R.L. will process your personal data that you provide directly in the context of using the Site, such as the data you provide in the contact/questions/complaints section, to the extent you contact us in this way.

III. Purposes and Legal Grounds of Processing

III.1. If you are a customer of the Site, S.C. LUCOMMERCE S.R.L. processes your personal data as follows:

- For carrying out the contractual relationship between you and **S.C. LUCOMMERCE S.R.L.**, namely for taking, validating, shipping and invoicing the order placed on the Site, informing you about the status of the order, organizing the return of ordered products, etc.

Legal Ground: The processing of your data for this purpose is based on the contract concluded between you and **S.C. LUCOMMERCE S.R.L.**, defined in the Terms and Conditions. Providing your personal data is necessary for the execution of this contract. Refusal to provide data may result in the impossibility to conduct the contractual relationship between you and **S.C. LUCOMMERCE S.R.L.**

- For fulfilling the legal obligations incumbent upon **S.C. LUCOMMERCE S.R.L.** in the context of the services provided through the Site, including fiscal obligations and archiving obligations.

Legal Ground: Processing your data for this purpose is required based on legal obligations. Providing your data for this purpose is necessary. Refusal to provide data may result in **S.C. LUCOMMERCE**

S.R.L. being unable to comply with its legal obligations and therefore unable to provide services through the Site.

- For marketing activities, namely sending, by means of distance communication (email, SMS), commercial communications regarding the products and services offered by **S.C. LUCOMMERCE S.R.L.** through the Site.

Legal Ground: Processing your data for this purpose is based on your consent, if you choose to provide it.

Note: Separate, explicit consent for direct marketing must be collected (unticked by default and not conditional for order placement). Proof of consent must be retained.

You may express your consent for processing for this purpose by ticking the appropriate box when creating your account or later in the "My Account Information" section. To unsubscribe from such commercial communications, you can use the option at the end of each email/SMS containing commercial communications. Additionally, you can unsubscribe in the "My Account Information" section.

Providing your data for this purpose is voluntary. Refusal to provide consent will not have any negative consequences for you.

- For carrying out various analyses and reports regarding how the Site functions, creating consumer preference profiles, mainly to improve the experience offered on the Site.

Legal Ground: Processing your data for this purpose is based on the legitimate interest of **S.C. LUCOMMERCE S.R.L.** to continuously improve the customer experience on the Site. Providing your data for this purpose is voluntary. Refusal will not have negative consequences for you.

III.2. If you are a visitor of the Site, S.C. LUCOMMERCE S.R.L. processes your personal data as follows:

- For marketing activities, namely sending, by means of distance communication (email, SMS), commercial communications regarding the products and services offered by **S.C. LUCOMMERCE S.R.L.** through the Site.

Legal Ground: Processing your data for this purpose is based on your consent, if you choose to provide it.

You may express your consent by filling out and ticking the appropriate box in the newsletter subscription form available on the Site. To unsubscribe, you can use the option at the end of each marketing email/SMS.

Providing your data for this purpose is voluntary. Refusal will not have any negative consequences for you.

- For resolving complaints, requests, and for monitoring traffic and improving your experience on the Site.

Legal Ground: Processing your data for this purpose is based on the legitimate interest of **S.C. LUCOMMERCE S.R.L.** to ensure proper Site functioning and continuously improve the experience of visitors, including by resolving various comments, questions, or complaints.

Providing your data for this purpose is voluntary. Refusal will not have negative consequences for you.

IV. Duration of Data Processing

As a rule, **S.C. LUCOMMERCE S.R.L.** will process your personal data for as long as necessary to achieve the purposes described above.

[Note: include only if applicable] If you are a customer, we will process your data for the entire duration of the contractual relationship and afterwards according to legal obligations (e.g., financial-accounting records which must be kept for 10 years from the end of the financial year during which they were created).

[Note: include only if applicable] If you are a customer and you exercise the option to delete your user account by pressing the "Delete account" button in the "My Account Information" section, **S.C. LUCOMMERCE S.R.L.** will interpret this as your option to unsubscribe from receiving marketing communications about products and services offered through the Site. Accordingly, if you choose to delete your account, we will no longer send you such emails/SMS. However, deleting the account will not automatically delete your personal data. If you want your data to no longer be processed or you want it erased, you may exercise your rights detailed in Section VII below. If you request deletion of the account while there is at least one active order, the request will be processed only after the delivery and completion of the last active order.

If you withdraw your consent for marketing processing, **S.C. LUCOMMERCE S.R.L.** will stop processing your data for this purpose, without affecting processing done based on your consent prior to withdrawal.

V. Disclosure of Personal Data

For the fulfillment of the processing purposes, **S.C. LUCOMMERCE S.R.L.** may disclose your data to partners, third parties or entities that assist **S.C. LUCOMMERCE S.R.L.** in operating the Site (e.g., courier companies, IT service providers), or to public authorities, in the following exemplary cases:

- for managing the Site;
- when disclosure is necessary to award prizes or other benefits obtained as a result of your participation in promotional campaigns organized by **S.C. LUCOMMERCE S.R.L.** via the Site;
- for maintaining, customizing and improving the Site and services offered;
- for performing data analysis, testing and research, monitoring usage and activity trends, developing security features and user authentication;
- for transmitting marketing communications under legal conditions and limits;
- when disclosure is required by law, etc.

VI. Transfer of Personal Data

Personal data provided to **S.C. LUCOMMERCE S.R.L.** may be transferred outside Romania but only to states within the European Union.

VII. Your Rights

Under the applicable personal data processing legislation, you, as a data subject, benefit from the following rights:

- the **right to be informed**, i.e., the right to receive details regarding the processing activities by **S.C. LUCOMMERCE S.R.L.**, as described in this document;
- the **right of access to data**, i.e., the right to obtain confirmation whether **S.C. LUCOMMERCE S.R.L.** processes your personal data, as well as details regarding processing such as the manner of processing, the purpose, recipients or categories of recipients, etc.;
- the **right to rectification**, i.e., the right to obtain without undue delay correction of inaccurate or unjustified personal data by **S.C. LUCOMMERCE S.R.L.**, as well as completion of incomplete data; Rectification/completion will be communicated to each recipient to whom the data were disclosed, unless this proves impossible or involves disproportionate effort;
- the **right to erasure of data**, without undue delay (“the right to be forgotten”), where one of the following applies:
 - the data are no longer necessary for the purposes for which they were collected or processed;
 - consent is withdrawn and there is no other legal ground for processing;
 - the data subject objects to processing and there are no overriding legitimate grounds;
 - personal data were processed unlawfully;
 - the data must be erased to comply with a legal obligation;
 - personal data were collected in connection with the offering of information society services according to EU or national law under which the controller falls.It is possible that, following a data deletion request, **S.C. LUCOMMERCE S.R.L.** may anonymize this data (thus depriving it of personal character) and continue processing for statistical purposes;
- the **right to restriction of processing** to the extent that:
 - the person contests the accuracy of the data, for a period allowing verification of the data accuracy;
 - processing is unlawful and the person opposes erasure and requests restriction instead;
 - the controller no longer needs the data, but the person requires them for establishment, exercise, or defense of legal claims; or
 - the person objected to processing (other than for direct marketing), pending verification whether the legitimate grounds of the controller override those of the person;
- the **right to data portability**, i.e., (i) the right to receive personal data in a structured, commonly used and machine-readable format, and (ii) the right to have such data transmitted by **S.C. LUCOMMERCE S.R.L.** to another data controller, where legally applicable;

- the **right to object** – regarding processing activities, exercisable by sending a request as indicated below:
 - at any time, on grounds related to your particular situation, to processing based on the legitimate interest of **S.C. LUCOMMERCE S.R.L.** or public interest, unless **S.C. LUCOMMERCE S.R.L.** demonstrates compelling legitimate grounds overriding your interests, rights and freedoms, or for establishment, exercise, or defense of legal claims;
 - at any time, free of charge and without justification, to processing for direct marketing purposes;
- the **right not to be subject to automated individual decision-making**, including profiling, that produces legal effects or significantly affects you;
- the **right to address the National Supervisory Authority for Personal Data Processing or competent courts**, as you deem necessary.

For any additional questions regarding how personal data are processed and to exercise your rights mentioned above, please contact: **contact@athlox.ro**