

# 1 OUR POLICY

Comet Feuerwerk GmbH ("**we**", "**us**" or "**our**") of Überseering 22, D-27580, Bremerhaven is committed to protecting and respecting your privacy and data protection rights.

Comet Feuerwerk GmbH is part of the Li & Fung Group and is registered as a data controller with the Information Commissioner's Office ("**ICO**") with registration number HRB 3664.

This policy sets out how we will process the personal data that we collect about you through your use of our website [www.comet-feuerwerk.de](http://www.comet-feuerwerk.de) (the "**Website**") in accordance with applicable data protection laws (including Regulation (EU) 2016/679 known as the General Data Protection Regulation (or "**GDPR**") and the Data Protection Act 2018 (the "**Act**") and your rights under such laws.

Please read this policy carefully to understand our practices regarding how we treat your personal data. For further information, please contact our Data Protection Officer at [dpo@lifung.com](mailto:dpo@lifung.com).

# 2 INFORMATION WE PROCESS ABOUT YOU

"Personal data", or personal information, means any information that can personally identify you, such as your name, address and contact details.

We may collect and process the following personal data about you connected to your use of the Website:

- Information that you provide by submitting forms on the Website, such as your name, email address and company name on the "contact us" form.
- Information that you provide to us if you contact us to report a problem with our Website, this may include, for example, your contact details in order for us to let you know when the problem has been resolved.
- Usage data detailing your visits to our Website including, but not limited to, traffic data, location data and other communication data and the resources that you access. Please see "cookies" below for further information.

We do not collect any special categories of personal data about you (for example details about your race or ethnicity, religious or philosophical beliefs or health information) nor any information about criminal convictions and offences.

Note that we (or another member of the Li & Fung Group) may process information about you if you become a customer, supplier or employee. You will be provided with a separate privacy policy in such instances.

# 3 WHY WE PROCESS YOUR INFORMATION

We use the personal information that we collect about you through your use of the Website in the following ways:

- To ensure that content on the Website is presented in the most effective manner for you and your device.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.
- To respond to any enquiry that you submit on the "contact us" form.

## 4 OUR LAWFUL GROUNDS

We process the personal data collected through your use of the Website for our legitimate interests, namely to improve your experience of our Website and to remember your preferences. Where we process your personal data for the purposes of communicating with you we have legitimate interests in providing you with excellent customer service which includes sending you content and information that we feel will be of interest to you or that you have requested.

Your personal data may also be used for other purposes for which you give your permission, for example, in order to conduct surveys or research. We may also use your personal data when required by law or otherwise where lawfully permitted.

## 5 HOW LONG DO WE KEEP YOUR PERSONAL DATA

If you contact us through our Website but do not become a business customer or supplier we will delete your personal data after three years of your first communication. If you do become a business customer or supplier we will retain your information up to a maximum period of six years from the end of our relationship with you. We retain information in accordance with our Data Retention Policy.

## 6 STORING AND SHARING YOUR INFORMATION

Our servers are predominantly located within the EEA (European Economic Area). We also use servers outside the EEA, in which case we will ensure that all reasonable steps necessary are taken to ensure that your personal information is treated securely and in accordance with this privacy policy and in accordance with Data Protection Laws.

We may share your personal information within the Li & Fung group to ensure that your enquiry is dealt with by the appropriate entity. This may involve transferring your data outside the EEA, for example, as our head office is located in Hong Kong. In respect of such transfers we rely upon our international data sharing agreement which incorporates model contractual clauses to protect the transfer of personal data outside the EEA.

We may also disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to protect the rights, property, or safety of our customers, or others
- in order for them to provide us with services, for example, cloud storage, search engine facilities,

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 7 YOUR RIGHTS

You have specific rights under Data Protection Laws in respect of the personal data we process about you. If you seek to exercise your rights we will explain whether or not the right applies to you. Please be aware that if your request is manifestly unfounded or excessive we may refuse to deal with your request or charge a reasonable fee for dealing with it.

Your rights include:

- The right of access to the personal data we hold.
- The right to rectify (i.e. correct) your personal data where it is inaccurate or incomplete.
- The right to delete your personal data, but only in specific circumstances, for example where the personal data are no longer necessary in relation to the purpose for which it was originally collected or processed. It may not therefore be possible for us to delete the information we hold about you if you request this, for example, if we have an ongoing contractual relationship with you.
- The right to restrict processing in specific circumstances, for example while we are reviewing the accuracy or completeness of data, or deciding on whether any request for erasure is valid. In such cases we shall continue to store the data, but not further process it until such time as we have resolved the request.
- The right to data portability which means the right to receive, move, copy or transfer your personal data to another controller in certain circumstances, namely when we are processing your personal information based on consent or on a contract and the processing is carried out by automated means.
- The right to object in cases where processing is based upon our legitimate interests and to object to direct marketing (as detailed above).

Please contact us at [eudpo@lifung.com](mailto:eudpo@lifung.com) if you would like to exercise any of your data protection rights or if you have any queries in respect of your rights.

## 8 COOKIES

When you visit the Website we use cookies to maintain your connection to the Website. A cookie is a small file of letters and numbers that is stored on your browser or the hard drive of your device if you agree.

Cookies help us to provide you with a good experience when you browse the Website and also allows us to improve the Website where necessary. By continuing to browse the Website you are agreeing to the use of cookies. If you do not agree to the use of cookies, please stop using the Website immediately. Note that if you disable the use of cookies in your settings you may lose some useful functionality of our Website.

We may collect information about your device, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website.

The table below provides more information about the cookies we use and why:

Name of cookie	Purpose of the cookie
Google Analytics	This is a web analytics service provided by Google Inc which uses cookies to show us how visitors found and explored our site, and how we can enhance their experience. It provides us with information about the behaviour of our visitors (eg how long they stayed on the site, the average number of pages viewed) and also tells us how many visitors we have had.
_ga	This cookie distinguishes users from each other
_gid	This cookie distinguishes users from each other
_gat	This cookie stops too many users from accessing the website

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you visit our Website.

## 9 COMPLAINTS

If you have a complaint relating to data protection please contact [dpo@lifung.com](mailto:dpo@lifung.com) or write to us at LF Europe Limited, Centenary House, Centenary Way, Salford, Manchester, M50 1RF.

Alternatively, you can complain to our supervisory authority, the ICO by telephoning 0303 123 113 or writing to Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Further details can be found at [www.ico.org.uk](http://www.ico.org.uk).

## 10 FURTHER INFORMATION

For further information on this policy, please contact our Data Protection Officer at [dpo@lifung.com](mailto:dpo@lifung.com).

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

The Website may, from time to time, contain links to and from the websites of our advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

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