



Privacy policy

Last updated on 25th of March. 2021

Information pursuant to Articles 13, 14 and 21 of the GDPR (General Data Protection Regulation). The protection of your privacy is important to us. Here you can find out which personal data we collect when you visit our website, why we do this, how we process the data and how we protect it. In addition, we inform you about your rights to data protection.

The processing of personal data, such as the name, address, e-mail address or telephone number of a person concerned, is always carried out in accordance with the Basic Data Protection Regulation and in accordance with the country-specific data protection regulations applicable to CGift Trading OÜ by means of this data protection declaration, our company wishes to inform the public about the type, scope and purpose of the personal data collected, used and processed by us. Furthermore, this data protection declaration informs the persons concerned about their rights.

CGift Trading OÜ, as the data controller, has implemented numerous technical and organisational measures to ensure that the personal data processed via this website is protected to highest degree possible.

Nevertheless, Internet-based data transmissions can in principle have security gaps, so that absolute protection cannot be guaranteed. For this reason, every person concerned is free to transmit personal data to us by alternative means, such as by phone.

1. Who we are?

We, CGift Trading OÜ, are the operator of this website www.cgift-trading.com. As the operator we are responsible for the protection of the processed personal data. Please contact us if you have any questions about this Privacy Policy or the Protection of your data:

CGift Trading OÜ, Lasnamäe linnaosa, Väike-Paala tn 2, Tallinn 11415, Harju maakond, Estonia

Phone: +49 40 679 580-53

Email: info@cgift.io

Homepage: <https://www.cgift-trading.com>

2. What data we use and how we obtain it?

When we process personal data, this means that we collect, store, submit, delete or use personal data in some other form. 'Personal data' means any information relating to a natural person, e.g.:

- anyone who visits our website,
- people who signed up for our Newsletter.

When you visit our website, we process usage and log data, such as:

- IP address of the accessing computer,
- name of the retrieved file,
- date and time of retrieval,
- amount of data transferred,
- notification of successful retrieval,
- browser type and version as well as the operating system you are using,
- referrer URL,
- requesting provider
- screen resolution.

If you Sign Up for our Newsletter, we will process your personal data and contact details, e.g.:

- name,
- Email address,
- telephone number.

3. How and on what legal basis do we process your data when you visit our website?

Log data

If you visit our website we process usage and log data to display our website and to ensure its stability and security. Moreover, we use the protocol data for statistical evaluations in the context of our website's operation. In the case of the unlawful use of our website, the protocol data facilitate detection of possible breach or rights violation - for example, in the case of a cyber-attack on our website. We use your data in these cases to defend against the attack and to determine the origin of the attack with the aim of taking criminal and civil action against the responsible persons and preventing future attacks more effectively.

The data mentioned above is processed on the basis of a balancing of interests in accordance with Article 6(1)(1)(f) GDPR.

Cookies

Our website contains cookies. Cookies are text files that are stored in the internet browser or by the internet browser on your end device. The cookie contains a string of characters that enables the unique identification of your system when you return to the website. The cookies are transferred to your browser either from our server or a third-party server.

Technically required cookies

We use technically required cookies to make the use of this website safer and more user-friendly. Among other things, these cookies can ensure the availability of content and prevent the repeated loading of content. Some elements of this website also require that the requesting browser can be identified even after a page change. The data collected from you using these technically necessary cookies will not be used to create user profiles. The following data is stored and transmitted in the cookies:

- current session ID
- use of certain website content, e.g. frequency or extent of use
- taking note of certain website contents, e.g. product information
- language settings

Processing is based on a balancing of interests that always takes your interests into account according to Article 6(1)(1)(f) GDPR.

Most of the cookies ("session cookies") used by us and the data stored and transmitted therein are automatically deleted at the end of your visit. Other cookies ("persistent cookies") remain stored on your device until you delete them.

You can set your browser in such a way that you are informed about the setting of cookies and only allow the acceptance of cookies for certain cases, or generally exclude it. You can also activate the automatic deletion of cookies when closing the browser. You can delete cookies that have already been stored at any time. When cookies are deactivated, the functionality of our website may be limited.

Analytical cookies

We also use cookies to analyze your surfing behavior for advertising purposes and to measure reach. Your data collected in this way will be pseudonymized through technical measures. The data will not be stored together with other personal data that we collect from you.

Information on specific ways to opt out of the use of analytic cookies can be found in the corresponding description of the cookie. You can also usually set your browser so that you are informed about the setting of cookies and only allow cookies in individual cases, exclude the acceptance of cookies for certain cases or in general, and activate the automatic deletion of cookies when you close your browser. You can delete cookies that have already been saved at any time. When cookies are deactivated, the functionality of this website may be limited.

The processing of data by means of cookies is based on a balance of interests that always also takes your interests into account article 6(1)(1)(f) GDPR. Our legitimate interest in the processing lies in the aforementioned purposes of the use of the respective cookies. Where required, the legal basis for the data processing is your given consent as per article 6(1)(1)(a) GDPR.

We use analytical cookies by the following service providers:

Google Analytics



The website uses Google Analytics, a web analysis service of Google LLC, 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA ('Google').

Google Analytics also uses cookies which are stored on your end device and which enable an analysis of your use of the website. The information generated by the cookie about your use of this website is usually transferred to a Google server in the USA and stored there on the basis of a data processing agreement that we have concluded with Google according to article 28 GDPR.

However, as part of the IP anonymization activated for this website, your IP address will be shortened by Google within member states of the European Union or in other signatories to the Agreement on the European Economic Area beforehand. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there.

Google will use this information on our behalf to analyze your use of the website, to compile reports on website activity, and to provide us with other services relating to website and internet use. The IP address transmitted by your browser in the context of Google Analytics will not be merged with other Google data. This website uses Google Analytics with the extension '_anonymizeIp()'. This means that IP addresses are further processed in abbreviated form so that they cannot be linked to a particular individual. Insofar as the data collected about you is personally identifiable, it will be excluded immediately and the personally identifiable data will be promptly deleted.

We use Google Analytics to analyze and improve the use of this website on a regular basis. Using the statistics we acquire, we can improve our service to you and make it more interesting for you as a user. In the exceptional cases in which personal data is transferred to the USA, Google has submitted to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

The information for the provider of Google Analytics can be found here: Google Dublin, Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland. Fax: +353 (1) 436 1001. You can find the terms of service here: <https://www.google.com/analytics/terms/us.html>

Information on data protection can be found at <http://www.google.com/analytics/learn/privacy.html> and in Google's privacy policy at <http://www.google.de/policies/privacy>. You can prevent Google from collecting the data related to your use of the website generated by the cookie (including your IP address) and Google's processing of this data by downloading and installing the browser plug-in available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.

You can also prevent the collection of data by Google Analytics by clicking on the following link. An opt-out cookie will then be set to prevent future collection of your data when you visit this website: <https://tools.google.com/dlpage/gaoptout/eula.html>

Google Ads Conversion

We use the services of Google Ads Conversion to draw attention to our attractive offers with the help of advertising media (so-called Google Ads) on external websites. In relation to the data of the advertising campaigns, we can determine how successful the individual advertising measures are. In doing so, we pursue the interest of displaying advertising to you that is of interest to you, of making our website more interesting for you and of achieving a fair calculation of advertising costs.

These advertising media are delivered by Google via so-called "Ad Servers". We use ad server cookies for this purpose, which can be used to measure certain parameters for measuring success, such as the display of ads or clicks by users. If you access our website via a Google advertisement, Google Ads stores a cookie on your terminal device. These cookies usually lose their validity after 30 days and are not intended to identify you personally. For this cookie, the unique cookie ID, number of ad impressions per placement (frequency), last impression (relevant for post-view conversions) and opt-out information (marking that the user no longer wishes to be addressed) are usually stored as analysis values.

These cookies enable Google to recognize your Internet browser. If a user visits certain pages on an ad customer's website and the cookie stored on their computer has not expired, Google and the customer may recognize that the user clicked on the ad and was directed to that page. Each ads customer is assigned a different cookie. Cookies cannot therefore be tracked through the websites of ads customers. We ourselves do not collect or process any personal data in the aforementioned advertising measures. We only receive statistical evaluations from Google. These evaluations enable us to identify which of the advertising measures used are particularly effective. We do not receive any further data from the use of the advertising media; in particular, we cannot identify users on the basis of this information. Due to the marketing tools used, your browser automatically establishes a direct connection with the Google server. We have no influence on the extent and further use of the data collected by Google through the use of this tool and therefore inform you



according to our state of knowledge: By integrating Ads Conversion, Google receives the information that you have called the relevant part of our website or clicked on an advertisement from us. If you are registered with a Google service, Google can assign the visit to your account. Even if you are not registered with Google or have not logged in, it is possible for the provider to find out and store your IP address.

Google Ads Remarketing

We use the remarketing function within the Google Ads service. With the remarketing function we can present users of our website on other websites within the Google advertising network (in Google search or on YouTube, so-called "Google ads" or on other websites) ads based on their interests. For this purpose, the interaction of users on our website is analysed, e.g. which offers the user is interested in in order to be able to display targeted advertising to users on other pages even after they have visited our website. For this purpose, Google stores a number in the browsers of users who visit certain Google services or websites in the Google display network. This number, known as a "cookie," is used to track the visits of these users. This number is used to uniquely identify a web browser on a particular device and not to identify a person; personal data is not stored.

Google Ads Opt-out

You can prevent participation in this tracking procedure by Google Ads Conversion and Remarketing in different ways:

- by an appropriate setting in your browser software, in particular, the disabling of third-party cookies, such will result in you not receiving ads from third-party providers;
- by disabling cookies for conversion tracking, by setting your browser to block cookies from the "www.googleadservices.com" domain, <https://www.google.de/settings/ads>, whereby this setting will be erased when you erase your cookies;
- by deactivating the provider's interest-themed ads that are part of the self-regulation campaign "About Ads" at the link <http://www.aboutads.info/choices>, whereby this setting will be erased when you erase your cookies; by means of permanent deactivation in the browsers Firefox, Internet Explorer or Google Chrome under the link <http://www.google.com/settings/ads/plugin>.

Please note that in this case you may not have full use of all the functions on this website.

Further information on data protection at Google can be found here:

<http://www.google.com/intl/de/policies/privacy> and <https://services.google.com/sitestats/en.html>.

Alternatively, you can visit the website of the Network Advertising Initiative (NAI) under

<http://www.networkadvertising.org>. Google complies with the EU-US Privacy Shield,

<https://www.privacyshield.gov/EU-US-Framework>. The legal basis for the data processing is

your given consent as per article 6(1)(1)(a) GDPR.

4. How and on what legal basis do we process your data when you register on our website?

The user or visitor of our website has the option of registering on the website of the data controller by providing personal data. The personal data transmitted to the data controller in this process is determined by the respective input mask used for registration. The personal data entered by the user is collected and stored exclusively for internal use by the controller and for its own purposes. The controller may arrange for the data to be disclosed to one or more processors, such as a parcel service, who will also use the personal data solely for internal purposes attributable to the controller.

By registering on the controller's website, the IP address assigned to the data subject by the Internet service provider (ISP), the date and time of registration are also stored. This data is stored in order to prevent misuse of our services and, if necessary, to enable us to investigate criminal offences. In this respect, the storage of this data is necessary to safeguard the data controller. These data will not be passed on to third parties unless there is a legal obligation to do so or the data is used for criminal prosecution.

The registration of the user by voluntarily providing personal data serves the purpose of the data controller to offer the data subject contents or services which, due to the nature of the matter, can only be offered to registered users. Registered persons are free to modify the personal data provided during registration at any time or to have them completely deleted from the database of the data controller.

The data controller shall provide any user with information on the personal data stored on the data subject at any time upon request. Furthermore, the data controller shall correct or delete personal data at the request or notice of the user, unless this is contrary to any legal obligation to retain such data. The entire staff of the data controller shall be available to the data subject as contact persons in this context.

5. How and on what legal basis do we process your data when you register for our newsletter on our website?

On the CGift Trading website, users are given the opportunity to subscribe to our company newsletter. The personal data transmitted to the data controller when ordering the newsletter is determined by the input mask used for this purpose.

CGift Trading OÜ informs its customers and business partners about the company's offers at regular intervals by means of a newsletter. The newsletter of our company can only be received by the person concerned if (1) the person concerned has a valid e-mail address and (2) the person concerned registers to receive the newsletter. For legal reasons, a confirmation e-mail in the double opt-in procedure will be sent to the e-mail address entered for the first time by the person concerned for the purpose of sending the newsletter. This confirmation e-mail is used to check whether the owner of the e-mail address as the person concerned has authorised receipt of the newsletter.

When registering for the newsletter, we also store the IP address assigned by the Internet Service Provider (ISP) to the computer system used by the person concerned at the time of registration as well as the date and time of registration. The collection of this data is necessary in order to be able to trace the (possible) misuse of the e-mail address of a data subject at a later point in time and therefore serves to legally safeguard the data controller. The personal data collected as part of a newsletter registration will only be used to send our newsletter. Furthermore, subscribers to the newsletter may be informed by e-mail if this is necessary for the operation of the newsletter service or registration, as might be the case in the event of changes to the newsletter offering or changes to the technical conditions. The personal data collected as part of the newsletter service will not be passed on to third parties. The subscription to our newsletter can be cancelled by the person concerned at any time. The consent to the storage of personal data, which the person concerned has given us for the newsletter dispatch, can be revoked at any time. For the purpose of the revocation of the consent an appropriate left is in each new type character. It is also possible at any time to unsubscribe from the newsletter dispatch directly on the website of the data controller or to inform the data controller of this in any other way.

6. How is the newsletter tracked?

The CGift Trading OÜ newsletters contain so-called tracking pixels. A pixel-code is a miniature graphic that is embedded in e-mails that are sent in HTML format to enable log file recording and analysis. This allows statistical evaluation of the success or failure of online marketing campaigns. Based on the embedded pixel-code, CGift Trading OÜ can recognize if and when an e-mail was opened by a person and which links in the e-mail were accessed by that person.

Such personal data collected via the tracking pixels contained in the newsletters are stored and evaluated by the person responsible for processing in order to optimise the sending of the newsletter and to adapt the content of future newsletters even better to the interests of the person concerned. This personal data will not be passed on to third parties. Affected persons are entitled at any time to revoke the relevant separate declaration of consent submitted via the double opt-in procedure. After a revocation these personal data will be deleted by the person responsible for the processing. CGift Trading OÜ automatically interprets a unsubscription from the receipt of the newsletter as a revocation.

7. What contact options do I have via the website?

Due to legal regulations, the CGift Trading OÜ website contains information that enables quick electronic contact with our company and direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If a data subject contacts the data controller by e-mail or via a contact form, the personal data transmitted by the data subject is automatically stored. Such personal data transmitted voluntarily by a data subject to the data controller will be stored for the purposes of processing or contacting the data subject. This personal data will not be passed on to third parties.

8. Who receives my data?



We will transmit your personal data only if you have given your consent, if there is a legal basis for such, or it is necessary for enforcing our rights. We will transmit your data to service providers only if these meet the relevant data protection requirements.

9. When do we delete your data?

We will delete your data, as soon as the data is no longer needed for the purpose for which it was originally collected. For example, we will delete your usage data after your visit to our website, if we are not allowed to process it in the anonymized or pseudo-anonymized form for statistical purposes, as described above. For example, we delete your data from inquiries immediately after successful processing, if we are not allowed to process them further in order to provide you with information on new developments and events. In addition, we store your data even after fulfilment of the original collection purpose, if we are obliged to store them for other reasons, e.g. for archiving.

10. Will your data be transferred to a third country or an international organization?

If we process data to a third country (i.e. outside the European Union (EU) or the European Economic Area (EEA)) or in the context of the use of third party services or disclosure or transmission of data to third parties, this will only be done if it is to fulfill (pre)contractual obligations, on the basis of your consent, on the basis of a legal obligation or on the basis of our legitimate interests. Subject to legal or contractual permissions, we process or have the data processed in a third country only in the presence of the special conditions of article 44 ff. GDPR. That the processing is e.g. on the basis of specific guarantees, such as the officially recognized level of data protection (e.g. for the US through the Privacy Shield) or compliance with officially recognized special contractual obligations (so-called "standard contractual clauses").

11. What rights do you have when it comes to processing your data?

Regarding protection of your personal data, you have the following rights:

- the right to be informed in accordance with article 15 GDPR,
- the right to correct and update your data in accordance with article 16 GDPR,
- the right to delete your data in accordance with article 17 GDPR,
- the right to restrict the data processing in accordance with article 18 GDPR,
- the right to data transferability in accordance with the article 20 GDPR. Your right to information and the data deletion are subject to limitations set out in Sections 34 and 35 of the German Federal Data Protection Act. In addition, you have a right of appeal to the data protection supervisory authority (article 77 GDPR in connection with section 19 of the German Federal Data Protection Act).

12. Will we use your data for automated decisions making including profiling?

Data from visits to this website will not be used for automated decision-making or profiling in terms of article 22 GDPR.

13. Your obligation to provide us with your data

You must provide us with the data required for the initiation, implementation and termination of a business relationship or for a pre-contractual relationship with us and/or for which we are legally obliged to collect data. Without this data, we will generally not be able to broker and/or conclude a contract and execute and terminate it. This can also refer to data required later in the context of a business relationship.

14. Information on your right of objection in accordance with Article 21 GDPR Individual case-related right of objection:

You have the right, for reasons arising from your particular situation, to object at any time to the processing of personal data relating to you, which is required by art. 6(1)(e) GDPR (data processing due to public interest) and article 6(1)(f) GDPR (data processing due to balancing of interests); this also applies to the profiling based on this provision within the meaning of article 4 no. 4 of the GDPR.

If you object, we will no longer process your personal data, unless we can prove compelling reasons worthy of protection for the processing, which outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

Objection to the processing of your data for our direct marketing purposes:



In individual cases, we may process your personal data for our direct marketing and advertising. You have the right to object to processing of your personal data for the purposes of such advertising at any time; this also applies to the profiling, as far as it is associated with such direct marketing.

If you object to the data processing for direct marketing purposes, we will not process your personal data for these purposes.

Your objection does not need any special form. Please send it to the following address:

CGift Trading OÜ

Lasnamäe linnaosa, Väike-Paala tn 2

Tallinn 11415, Harju maakond, Estonia

Phone: +49 40 679 580-53

Email: info@cgift.io

Homepage: <https://www.cgift-trading.com>

15. Reservation of Right of Change

We reserve the right to change this data protection notice from time to time. We therefore recommend that you read this data protection notice regularly.