

# PRIVACY POLICY

## 1. Introduction

At Saro Island AB ("Saro Island", "we", "our", "us"), we protect your privacy and we always want you to feel safe when you submit your personal data to us. For us, it is important to be open and transparent with the information about how and why we process your personal data, as well as how we ensure that data processing is conducted responsibly and in accordance with applicable legislation. As of May 25, 2018, the General Data Protection Regulation ("GDPR") is applied within the EU / EEA.

## 2. General

By using the websites [www.lambrettawatches.com](http://www.lambrettawatches.com) or [www.lambrettawatches.com/sv](http://www.lambrettawatches.com/sv) personal data might be collected and processed. Saro Island AB is the owner of the brand Lambretta Watches, and is responsible for collection and processing of such personal data.

Depending on whether you are for example a newsletter subscriber, online shop customer, Loyalty Club member, or have an active warranty case, different parts of our privacy policy will apply to you. In each chapter we describe in more detail what personal data we have about you, how we use these and how long we save the data. We also describe how to access the data we have about you, as well as how to request an amendment in your data or that we stop using your data.

At Saro Island we are highly dedicated to protect and respect the integrity of all our customers and other visitors to our websites. We have adopted this policy to provide a strong protection for the personal data we process. Taking great care to protect and respect your privacy, we strive to maintain a high level of security in all processing of personal data. For that reason, Saro Island has taken necessary and appropriate technical and organisational measures in order to protect your personal data from improper access, use, change and deletion.

## 3. Personal Data Controller

The Swedish company, Saro Island AB, is the controller of the personal data you submit to us and responsible for your personal data under applicable data protection law.

Saro Island AB  
Västra Särövägen 83  
429 42 Särö  
Sweden

Tel: +46 (0)31 755 21 00  
E-mail: [privacy@lambrettawatches.com](mailto:privacy@lambrettawatches.com)  
Companies register: Bolagsverket/Swedish Companies Registration Office  
Company registration number: 559263-1476

You are always welcome to contact us if you have any questions or concerns.

## 4. What personal data is collected, why, and for how long?

Saro Island might collect data when you use any of our websites, for example if you place an online order, subscribe for our newsletter or register to our Loyalty Club. We collect the personal data you provide in the checkout/form and share with us, data which is necessary to administer your customer relation with us and to provide services in accordance with our mutual agreement. This typically includes information such as your: *name, address, e-mail address and telephone number*. We might also collect other data when you place an order, when you visit any of our websites or when you interact with us in other ways, such as: *gender, language settings, geographic information, IP address, which type of web browser you use, user patterns and behavior data (online movement)*.

### 4.1 We may for example use this personal data for the following purposes:

- to properly process and fulfill your placed order
- to send order confirmations and receipt of your payment
- to analyse and improve the quality of information for our products and services on our websites
- to evaluate and improve our correspondence with you regarding deliveries, warranty and repair issues, returns and refunds
- to send information, offers and promotions based on your interest
- to provide information regarding new products and services
- to give you access to the Loyalty Club's benefits and rewards
- to give you the possibility to connect with our social media accounts
- research on the level of customer satisfaction
- internal analysis and statistics on the use of our websites

This means that even in the event that no specific consent has been given for receiving any marketing information, you hereby give Saro Island permission to send you information about Lambretta Watches, our products that are the same or similar to those that you have ordered/registered, or other information of which we believe that you will find useful. Obviously, you have the right to let us know that you no longer wish to receive any information from us. For this, please see the information under '**Unsubscribe**' below.

We may also use data about how you use our website to prevent or detect fraud, abuse, and illegal uses and to comply with court orders, governmental requests or applicable law.

### 4.2 For how long is the personal data stored?

#### Newsletter Subscription

*What data:* Name, email address

*How long we store:* Until you wish to cancel your subscription

### Online Purchase

*What data:* Product/s, transaction and purchase information, name, address, phone number, e-mail address

*How long we store:* The data is saved for two years (same as our warranty period to be able to provide you with the best service)

### Registration/Loyalty Club

*What data:* Product, place of purchase and date, name, e-mail address, gender, country

*How long we store:* Data about registered product, place of purchase and date is saved for two years (same as our warranty period to be able to provide you with the best service), other data is saved until you wish to leave our Loyalty Club

### Warranty & Repair Case

*What data:* Product, place of purchase and date, warranty info, repair cause, name, address, phone number, e-mail address

*How long we store:* After the completed case, the data is saved for a maximum of 3 months

### Return Case

*What data:* Product/s, order number, return cause, wanted measure, name, e-mail address

*How long we store:* After the completed case, the data is saved for a maximum of 3 months

Please note that certain data must be stored for a longer period of time, even after a business relationship has been terminated, when this is required by national law. Such requirements may for example be included in tax or book keeping laws.

No information about you will be saved for longer than is necessary or in a manner that is inconsistent with law.

## 5. Protection and management of your personal data

Saro Island use a variety of security measures, including encryption and authentication tools, to maintain the safety of your personal data. Your personal data is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to these systems.

The personal data we collect, or generate and process in the context of our websites, is stored in Sweden.

## 6. Sub-processors and third party

Saro Island are entitled to hire sub-processors and third party service providers for processing personal data on your behalf. We might share your personal data with sub-processors or third party service providers processing

personal data on behalf of Saro Island. For example, this could be necessary to process credit cards and payments, for shipping and deliveries by freight forwarding and courier companies, to manage and service our data, to distribute e-mails, for research and analysis purposes, to manage brand and product promotions, as well as administering certain services and features. Examples of such sub-processors and third party service providers are: *DIBS, PayPal, DHL, UPS, SendGrid and Mecenat Student Card*.

All companies that process personal data on our behalf will always enter into a data processing agreement with us in order to ensure that a high level of protection of your personal data is maintained by our partners.

Your personal data may also be disclosed to third parties when it is required by law, other statutory or governmental decisions, or information is provided to insurance companies, banks or benefit partners as described above.

We may also disclose personal data to third parties, such as the police, the tax authority or any other authority, in the case of a criminal investigation or if we are otherwise required to provide such information based on law or authority decision.

We will not disclose your personal information to any extent other than as described in the above paragraphs, and if we share your information, these will only be used for the same purpose as we initially collected them for.

## 7. Cookies

We use cookies on this website. A cookie is a small piece of data sent from a webpage and stored in a user's web browser, mobile phone, tablet or other device while the user is browsing that webpage. A cookie can help us to recognize your device the next time you visit the webpage so that it improves your shopping experience, such as holding items in your shopping cart, remember your language settings, provide you with access to certain functions on the webpage and/or register your surf patterns. Cookies do not contain any personally identifiable information such as your name, address or any financial information.

There are other technologies such as pixel tags, web bugs, web storage and other similar files and technologies that may carry the same functions as cookies. We use the term "cookies" for cookies and all such similar technologies. We use both persistent cookies and session cookies. Whereas persistent cookies remain on your computer for a longer period of time, session cookies are automatically deleted when the browser window is closed.

We use the following cookies for the purposes set out below:

### *Functional cookies*

We use functional cookies to operate certain functions of the webpage and to optimise your use of our website, meaning that when you continue to use or come back to the webpage, the site will be provided as you have previously requested, e.g. remembering your customisation and preferences of the webpage.

#### *Analytical/performance cookies*

These cookies allow us to recognize and count the number of visitors to our website and to see how visitors move around when they are using it. This helps us to improve the way our website works, for example, by ensuring that users find what they are looking for easily. We also use the information for statistical purposes.

#### *Marketing cookies*

With Google Analytics cookies we measure how you use the Lambretta Watches website. We use this information to help you choose the product that suits you the best and to show you offers for products you may be interested in during remarketing campaigns. We use Facebook & Instagram cookies to see which products you view. This enables us to show you relevant advertisements on Facebook and Instagram.

For more details about the cookies that these parties place and the data that can be collected with them, we refer to the policy statements by these parties: Google, Facebook & Instagram (your consent is required for the use of these cookies).

By using this website you accept that we use cookies, but if you do not want us to use cookies then you can easily stop them by managing your cookie preferences in your web browser. You can set your browser to refuse cookies, or delete certain cookies. In general you should also be able to manage similar technologies by using your browser's preferences. Please note that if you choose to block cookies, the due functioning of this webpage may be affected.

## 8. Your rights – withdrawal, access, correction and removal

You are entitled, in accordance with applicable data protection laws, to request access to the personal data processed about you at any time. You also have the right to have incorrect personal data about you corrected, to request that we erase your personal data (in some cases Saro Island cannot meet your request for erasure, if the data is required to comply with applicable law), limit our processing of your personal data, exercise your right to data portability, and object to the processing of your personal data.

Your personal information will not be processed for direct marketing if you oppose such processing. Where processing is based on consent you have the right to withdraw your consent to that processing at any time. For this, please see the information under '**Unsubscribe**' below.

In case you would like to exercise any of your rights, please contact us on [privacy@lambrettawatches.com](mailto:privacy@lambrettawatches.com)

If you feel that we have processed your personal information incorrectly, please always contact us at Saro Island. You also have the right to lodge complaints with a supervisory authority at any time if you believe that your personal data is processed in violation of applicable data protection legislation.

## 9. Unsubscribe

If you no longer wish to receive any information about our products or services, or for other Lambretta Watches marketing purposes, you can easily at any time follow the unsubscribe instructions included in each marketing email that you receive from Lambretta Watches.

## 10. Adjustments to this Privacy Policy

Saro Island is continuously working to secure your privacy so that you always can feel safe on our website. The type of personal data that we need, and the purposes we need such personal data for, may change over time. Therefore, we reserve the right to amend our privacy policy at any time. The most up-to-date version of this privacy policy is always the one published on our website (you will find the date of the latest amendment at the end of the privacy policy).

If you have any further questions about our privacy policy, please contact us.

## 11. Contact details

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Västra Särövägen 83  
429 42 Särö  
Sverige

Tel: +46 (0)31-755 21 00  
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*This Privacy Policy was last modified on 30 September 2020.*