

## Why does Ultra Fine Bubble have a Privacy Policy?

This Privacy Policy is for everyone (customer or not) who shares personal data with us through our webshop <https://www.ultra-fine-bubble.eu/> (hereinafter the "Webshop") or e-mail or any other way. In this policy we tell you in clear language why we need certain information about you and what we do with your personal data. Not only because we are legally obliged to do so, but mainly because we value your privacy as well as transparency.

Naturally, we strive to comply with the data protection rules of European and Dutch law as much as possible. Therefore, we give you the opportunity to consult this privacy policy **before** you share any personal information with us. That way, you know exactly what to expect from us, so you can make an informed decision.

To gain a full picture on how we handle your personal data that we collect in the Webshop, it is also important that you read our [Cookie Policy](#).

Any suggestions on how we can better protect your privacy? Let us know at [privacy@ultra-fine-bubble.eu](mailto:privacy@ultra-fine-bubble.eu) !

## How do we get your personal data?

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1. Information that you yourself share with us through our Webshop, via e-mail , at booths, events or otherwise.
  2. Data from your online interactions via cookies and other similar tracking technologies we use (please see the Cookie Policy for more information).
  3. Information contained in your communications (such as in e-mails and live chats) and information about how you respond to our e-mails and app messages.
  4. Publicly available information from your social media interactions with us or posts about us.
  5. Information from external data providers such as marketing companies to whom you have given permission to share your data.
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## What do we know about you when you visit our Webshop for the first time or several times?

Before we tell you what personal information we may collect about you, and for what reasons, we would like to remind you that there is an important difference when:

- (i) you visit our Webshop for the first time, and
- (ii) you are a returning visitor to our Webshop.

### Are you visiting our Webshop for the first time?

*Then we probably don't know you (yet). As long as you do not leave any personal information with us via the Webshop (e.g. via web forms, web chat, etc.), that remains the case. So you always decide for yourself what Ultra Fine Bubble knows about you.*

**Please note** that this does not necessarily mean that we have never collected personal information about you. In fact, you yourself may have already shared certain personal information with us through other means (think, for example: email, social media, mail, etc.).

*Have you never shared your contact information with Ultra Fine Bubble and still received marketing communications (e.g., by email, phone, mail, etc.)? You can.*

*We have commercial collaborations with influencers and/or marketing partners who promote our products for us. You may have left your contact information with them and*

they in return have passed that information on to us. This only happens at your own request because you wanted to proceed to purchase products.

### **Are you a returning visitor to our Webshop?**

Whether we recognize you when you visit our Webshop for the second or third time depends on your previous visits to our Webshop. If you never shared personal information with us during your visits to our Webshop (e.g. by creating a customer account, via web forms, web chat, etc.), we do not know who you are. So you always determine what Ultra Fine Bubble knows about you.

If you have already left your personal data in our Webshop, we can recognize you - also thanks to **cookies** - as a "returning visitor" (unless you have not accepted our tracking cookies). You can read how to disable these cookies and how long we keep them for in our [Cookie Policy](#).

If we notice that you return frequently and have left your phone number with us in the past with permission to be called or if you have purchased something from us before, we may call you to see what is stopping you from trying our product. Of course, you can then exercise the right to object with us if you do not want to be called. Also during this phone call, you completely choose what you tell and do not tell us about yourself.

### **What information do we collect about you?**

When you purchase a product from us we collect at least the following personal data:

- Name
- First name
- Residential address
- Billing address
- Email address
- Social Media username ( and other Social ID data)
- Click behavior Social Media and Webshop (provided tracking cookies are checked)
- Phone number (landline / cell phone)
- The login details linked to your Webshop customer account (don't worry, these are always encrypted)
- IP address and associated geographic location data (country and region, but not exact address)
- Communication preference
- Any other personal data voluntarily shared with Ultra Fine Bubble (e.g., during correspondence with Ultra Fine Bubble)

*Please note that the exact (amount of) personal information Ultra Fine Bubble collects about you may vary somewhat, and depends on what you share e.g. yourself and whether or not you have purchased anything in our Webshop, or if you are introduced to our product through events or influencers.*

### **Who is responsible for your personal data?**

**Ultra Fine Bubble is responsible for the personal data we save about you. We operate in Europe and have a Japanese parent company. When we refer to Ultra Fine Bubble, "us", "we" or "our" in this statement, we mean the Dutch subsidiary Ultra Fine Bubble B.V. registered at the Dutch Chamber of Commerce under file number 89197038 that sells its products to you through the Webshop.**

If you have any questions about how we handle your personal data please email us at [privacy@ultra-fine-bubble.eu](mailto:privacy@ultra-fine-bubble.eu) or write to the privacy officer at Koningin Julianaplein 10, second floor, 2595 AA in The Hague. We promise to respond to you within 24 hours.

## How, why and with what legal basis does Ultra Fine Bubble use my information?

### 1. Total Overview

Processing Activities	Purpose of Processing	Legal Basis
Web forms processing and creation of accounts	Customer management/ ordering process	Implementing agreement
Billing, collection of payments, etc.	Customer management/ ordering process	Execution of agreement + legal obligation to process transactions
Communication regarding the order, shipping, warranty, returns, recalls and use of the product in the form of emails and web chat	Customer management/ ordering process	Implementing Agreement, Justified interest.  <i>There is no way to oppose this given the nature of the relationship</i>
Marketing communications about products via email and social media contact about <ul style="list-style-type: none"> <li>Product updates</li> </ul>	Marketing and promotion	Consent or legitimate interest ( <i>Opt-out always possible</i> )
Customer satisfaction surveys,	Statistical analysis to optimize the operation of	Legitimate interest  <i>Free choice to participate or not</i>
Access to your shop account to analyze an occurred	Security engineering Customer management	Legitimate interest
Access to your customer account to make requested changes to your account	Customer Management	Permission

## Does Ultra Fine Bubble share my personal information with outside parties?

Your personal data is processed solely for our own internal business purposes as indicated in the overview above. We may, however, use external parties for these purposes. Such external parties may only process your personal data in accordance with our clearly defined instructions.

Specifically, we use the following categories of data processors:

- Companies we have engaged for **telemarketing purposes**:

*We may provide your contact information to outbound telemarketing agencies. They may call you if we have determined that you have expressed genuine interest in our services in the past and have not resisted such telephone calls in any way (e.g., on an initial phone call). You can indicate on the phone that you are not interested after all and do not wish to be called. Then that will be noted.*

*Are you still not sure if our Ultra Fine Bubble products are for you, or are you just too busy? Then we may call you back later. In any case, your contact information will not be kept longer than two years.*

- Companies we engaged to **build and maintain the Webshop, for IT technical support, database management, software integration and hosting purposes** (e.g. website designers, hosting partners, cloud partners, data centers, software vendors, external IT consultants, etc.);
- Companies or individuals we have engaged for **communication and marketing purposes** (e.g. for chat on the Webshop, for sending advertising emails, for posts on social media);
- Companies we have engaged for **analytical purposes of our Webshop and social media**;
- Companies we have engaged for **payment purposes** to enable online payments;
- Companies that help us maintain **inventory, distribution and logistics around the products** you order and are shipped to you.

#### Processing agreements.

To ensure optimal protection of your personal data, we have made the necessary contractual processing agreements with all these external parties to ensure that they have taken the necessary technical and organizational measures to protect your personal data. Also to delineate that they may only use these personal data for Ultra Fine Bubble's purposes (and therefore not for their own purposes).

#### No sale of your data.

Furthermore, your personal data will never be sold, transferred or communicated to third parties who wish to use it for their own purposes. In addition, we would like to point out to you that personal data may be collected by social networks when you use a social plug-in on our Webshop (for example, a like button from Facebook, Instagram or Pinterest).

#### Disclosure

Last but not least, it is only possible for us to disclose your personal data:

- To the competent authorities (i) when we are required to do so by law or in the context of legal or prospective legal proceedings, and (ii) to safeguard and defend our rights;
- If (substantially) all of our assets are acquired by a third party, in which case your personal data - which Ultra Fine Bubble has collected - will be one of the transferred assets.

## **Will my personal data be transferred to parties outside the European Economic Area (EEA)?**

We will only transfer your data outside the EEA to third parties if necessary and on one of the following conditions:

- The destination country provides an adequate level of protection, according to the European Commission;
- The destination country in itself does not provide an adequate level of protection, but we make the necessary contractual arrangements with the party in question, taking into account the model contractual clauses ("standard contractual clauses") as most recently published by the European Commission.

## **How do I know if Ultra Fine Bubble keeps my personal information secure?**

We have taken all appropriate technological and organizational precautions to minimize any risk of unauthorized access to and loss, misuse or alteration of your personal data within our own systems. For third-party systems, we have made appropriate arrangements or verified that they are reliable parties who have their security measures in place.

Nevertheless, it is important to know that it is impossible to guarantee a foolproof level of security. No method of transfer or transmission and of electronic storage of data over the Internet is 100% secure.

Of course, the security of your personal data also depends on the extent to which you are able to keep your personal login information secret. In any case, our employees will never ask you to share your login details. If you do decide to give your login details to a third party, this third party will have access to the personal data on your account and we can no longer guarantee the security of your data. If you determine that a third party has unauthorized access to your account, we recommend that you change your password immediately and contact us.

## **How long does Ultra Fine Bubble keep my personal data?**

Unless the law requires or justifies a longer retention period, we will never retain your personal data longer than necessary to accomplish the purposes described in this Privacy Policy.

## **What are my privacy rights and how can I exercise them?**

If your personal data are processed by Ultra Fine Bubble, you have the following rights towards us:

- **Right to access the personal data we hold about you;**  
*We are always willing to provide you with a clear and complete overview of the personal data we have collected about you so far.*
- **Right to rectification, completion or update your personal data;**  
*Do you have a Webshop account? If so, we would like to point out that you are primarily responsible for making the necessary changes to your personal Webshop account.*
- **Right to delete your personal data (the 'right to be forgotten')**  
*If you delete or have certain necessary personal data deleted, it is possible that certain services will no longer be accessible or can no longer be provided. A legal obligation or the performance of our agreement with you may not allow us to delete certain personal information. For example, we are required by law to retain invoices for a period of seven years (and sometimes longer).*

- **Right to restrict the processing of your personal data;**  
*It may happen that we are temporarily no longer allowed to use your data, but also that we cannot (yet) delete it. This can occur, for example, if you object to the processing of your personal data on the basis of our legitimate interest as a company. As long as we cannot prove that our interests outweigh your individual interests, we may not use your data.*
- **Right to withdraw your consent;**  
*If we process your personal data on the basis of your consent, you can withdraw your consent at any time.*
- **Right to transferability of your personal data;**  
*You have the right to obtain your personal data in a structured, common and machine-readable form. In addition, you have the right to ask us to transfer this personal data to another service provider, unless this is technically impossible.*
- **Right of objection/opposition to the processing of your personal data.**  
*You have the opportunity at any time to oppose the processing of your personal data for our "direct marketing" purposes (e.g., by adjusting your communication preferences), when based on our legitimate interest as a company.*

You may exercise your privacy rights free of charge by contacting us at [privacy@ultra-fine-bubble.eu](mailto:privacy@ultra-fine-bubble.eu). We will respond as soon as possible and no later than one month after we receive your request.

Would you like to exercise your right of access, right of rectification, right of deletion or right of portability? Then we are obliged to verify your identity first. We obviously do not want to disclose personal information without being sure that it is you. If we have reason to question your identity, we may request additional information to confirm it.

### **Can this Privacy Policy be changed in the future?**

It is certainly possible that we will update this Privacy Policy at a later date. We do this every time something (thoroughly) changes in the way we handle your personal data. We will then post a new version of the Privacy Policy on our Webshop.

### **Not satisfied with how we handle your personal data?**

If you have comments or complaints about the way we handle your personal data other than those mentioned under "what are my privacy rights", we ask you to first report these to us before filing a complaint with the Autoriteit Persoonsgegevens (the Dutch Data Protection Authority). You can do this by sending an e-mail with your complaint to [privacy@ultra-fine-bubble.eu](mailto:privacy@ultra-fine-bubble.eu). That way we can first try to find a solution together.

Are you still not satisfied after our provided solution? You have the right to file a complaint with the competent supervisory authority in the Netherlands: <https://www.autoriteitpersoonsgegevens.nl/>).