

# PRIVACY POLICY

Version dated 01.02.2019.

Thank you for using the Sizolution product and the services of Sizolution GmbH (hereinafter referred to as “we”). The protection of your data is essential to us, and we guarantee the use of your data in an appropriate manner. All data will be collected and used exclusively in accordance with applicable data protection legislation. We will explain below what data we collect, how we use it, and what rights you have regarding your data.

Sizolution GmbH is located at Kanalstraße 4 - 6, 13599 Berlin, and carries out activities on the website operation <http://www.sizolution.com>. We are also responsible for the Sizolution widget and for other solutions that help customers on our partner sites determine the size. Our partners - online clothing stores - are the data controller of your personal data. We act as a data processor providing visitors of an online store for recommendations on size, prediction of fit and recommendations on the most suitable clothing.

We process personal data in accordance with the German Federal Data Protection Act (Bundesdatenschutzgesetz/BDSG), German Teleservices Act (Telemediengesetz/TMG), и General Data Protection Regulation of the European Union (Datenschutzgrundverordnung/GDPR).

Please read this privacy policy carefully, as this will help you make informed decisions about the provision of your personal information. If you have any questions or concerns about our policies or our practices regarding your personal data, please contact us at [privacy@sizolution.com](mailto:privacy@sizolution.com).

## 1. WHAT INFORMATION WE COLLECT

### a. Information provided by you

You can use the Sizolution widget on one of our partners' websites without additional registration in order to get recommendations on determining the size of clothes for the product on which page you are. In order to get size recommendations for a specific product, you can provide the following information through our widget:

- \* Name (optional) - used to allow the user to create multiple accounts on one device (for example, for other family members);
- \* Gender;
- \* Height;
- \* Weight;
- \* Body shape;
- \* Photo of your body in full length (optional);
- \* Body measurements;
- \* Information about clothes, brand and size that suits you (optional);
- \* Bra size (only for women);
- \* Preferences for fit of the clothes;
- \* Age;
- \* In addition, information about your previous purchases in the store can be used to provide size determination services.

The widget calculates specific size recommendations using statistical methods, clothing data from partners, and sometimes anonymized purchase and return data. In some cases, you can transfer your preferred clothing sizes from the app to your personal shopping cart on the partner's site. The transferred personal data is stored in the corresponding database under a randomly generated session identifier.

We use the cookie technology (“cookies”) - small text files placed on users' computers to analyze their user activity, to improve the overall user interaction with our widget, in particular, to identify returned users and simplify the use of the widget. They can identify returning users, so you do not have to re-enter your basic data when you repeatedly use the application. In some cases, this allows you to immediately get a size recommendation on the page with a detailed description of the good of our partner and eliminates the need to reuse the widget. In some cases, our application sends the recommended size to the affiliate store (for example, so that the recommended size is immediately selected in your shopping cart).

b. Automatically collected information

Some information, such as the IP address and/or characteristics of the browser and device, is automatically collected when visiting the sites of our partners, as well as when using the widget.

We automatically collect certain information when you visit, use or navigate through our partner sites. This information does not disclose your specific identity (for example, your name or contact information), but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, links to URLs, device name, country, location, information about how and when you use our partner sites, as well as our widget and other technical information. This information is primarily needed to ensure the security and operation of our widget, as well as for our internal analytics and reporting. As a rule, such information is not identified, but if we associate it with you as a specific and identifiable person, we will consider it as personal data.

We also use the Yandex.Metrica web analytics service provided by YANDEX LLC, 119021, Russia, Moscow, L. Tolstoy st., 16 (hereinafter - Yandex).

The Yandex.Metrica service also uses cookies. Some information that we gather using cookies cannot identify you, but can help us improve the performance of our widget and sites. Information about your use of this widget collected by cookies will be transferred to Yandex and stored on a Yandex server in the EU and the Russian Federation. Yandex will process this information to evaluate your use of the site, compile reports for us on the activities of our site, and provide other services. Yandex processes this information in the manner prescribed by the terms of use of the Yandex.Metrica service.

You can refuse the use of cookies by selecting the appropriate settings in your browser. You can also use the tool <https://yandex.ru/support/metrika/general/opt-out.html>. However, this may affect the operation of certain functions of the site. By using this service, you agree to the processing of data about you by Yandex in the manner and for the purposes indicated above.

We use Hotjar in order to better understand our users’ needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don’t like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users’ behavior and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar’s privacy policy by clicking on this link.

You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites by following this opt-out link: <https://www.hotjar.com/legal/compliance/opt-out>.

## 2. PURPOSE OF USING YOUR INFORMATION

We use personal data collected using our widget exclusively in the following cases:

- \* Providing real-time clothing size recommendations.
- \* Providing suggestions on optimal products for you to our partners.
- \* Providing size assumptions on our partner sites.
- \* Optimization of the overall quality of our recommendation algorithms.

All personal data is processed anonymously or in association with your name. We never collect or process any additional personal identifying information, for example, address, payment information. We ask to enter a name in the widget, which will be used as your identifier. All data is stored on servers and databases are located in the European Union.

## 3. RIGHT OF INFORMATION PUBLICATION

Non-personal data, de-identified personal information and aggregated user statistics may be distributed at our discretion.

We only distribute and disclose your information in the following situations:

**Compliance with laws.** We may disclose your information if we are required by law to comply with applicable laws, to fulfill government requests, court decisions, and if it is required during a trial or court process, for example, in response to a court order or a subpoena (including in response to state authorities, in order to comply with the requirements of national security or law enforcement agencies).

**The most important interests and legal rights.** We may disclose your information if we believe that it is necessary to investigate, prevent, or take action regarding possible violations of our policies, alleged fraud, situations involving potential threats to the security of any person, as well as illegal activities, or in evidence of litigation in which we participate.

**Partners (stores), suppliers, consultants and other third-party service providers.** We may transfer your data to third-party suppliers, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do this work. Partners (stores) that use our widget can get information about the size of your body in order to fulfill your orders (purchases). Other examples include: data analysis, email delivery, hosting services, customer service and marketing activities. We may allow selected third parties to use tracking technologies on the Sites, which will allow them to collect data on how you interact with the Sites over time. This information can be used, among other things, to analyze and track data, determine the popularity of certain content and understand online activity better. If this is not specified in this Policy, we do not distribute, sell, rent, use, or exchange your personal information with third parties for the purpose of their distribution.

**Business transfers.** We may distribute or transfer your information in connection with or during merger negotiations, the sale of company assets, the financing or the acquisition of all or part of our business by another company.

**Affiliates.** We may share your information with our affiliates, in which case we will require these affiliates to comply with this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or are under common control with us.

With your consent. We may disclose your personal information for any other purpose with your consent.

#### 4. COOKIE FILES AND OTHER TRACKING TECHNOLOGIES

Cookies simplify various processes, the purpose of one of which is to simplify and improve the experience of a user visiting a site. Cookies are alphanumeric information files that are automatically saved by your browser on the hard drive of your computer when you visit the site.

Cookies will never damage your computer's hard drive and will not transfer personal data to us when you activate them. For example, we will use cookies to identify you as a customer, without the need to re-register on your side. The use of cookies does not mean that we receive new personal data during your online visit to the site. Most internet browsers automatically accept cookies. However, you can configure your computer so that no cookies will be stored on your computer or that a notification will be displayed on the screen every time you receive new cookies.

Deactivating cookies can also deactivate certain functions of our widget. The anonymous and encrypted information that was collected by cookies is not intended to collect personal data. The following cookies are used when using our widget:

*uid*: Contains a unique client id, stored under the Sizolution domain.

*uid\_male*: Contains a unique client id and is used to separate male and female accounts in case of multiple accounts on the device, stored under the Sizolution domain.

*uid\_female*: Contains a unique client id and is used to separate male and female accounts in case of multiple accounts on the device, stored under the Sizolution domain.

#### 5. SECURITY AND PROTECTION OF YOUR INFORMATION

We use appropriate technical and organizational measures to protect your data from accidental or intentional manipulation, partial or complete destruction, as well as unauthorized access. Our protection measures are constantly being improved in line with this level of technology.

#### 6. PROVISION OF INFORMATION, AS WELL AS CORRECTION OF THE DATA AND ITS DELETION

You have the right to receive information about your stored personal data, as well as to change incorrect data and block and/or delete data.

If you want us to delete your saved data from our database, please write an email to [privacy@sizolution.com](mailto:privacy@sizolution.com). Our team will contact you by email for more information (cookies ID), which will help us identify and delete your data from our system. Please consider the fact that since we do not store personal identification information in our system, we cannot process your removal request based solely on your email address or on your name. As soon as we receive the necessary additional information from you, within 14 days we will delete all the information in our database, which was entered from your browser.

Sizolution GmbH

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