

Data Protection Policy

Thank you for visiting our website. In this data protection policy, we will provide you with detailed information on how we deal with your personal data when you visit our website.

Joint Data Controllers

woom GmbH

Muthgasse 109A, 1190 Vienna, Austria

Telefonnummer: 0043 13 58 58 03

Email: woom@woom.com

Data protection officer

Kristin Thomseth

privacy@woom.com

and

The Little Bike Company Limited

Unit 11 Canalside

Northbridge Road

Berkhamsted

HP4 1EG

Tel: 01442 872 123

Email: woom@littlebikecompany.co.uk

Processing activities

We carry out the following processing activities from which we collect personal data from interested parties and customers who use our UK website www.woom.com as well as via our social media channels)

Running an online shop from our website

Running a loyalty programme

Managing warranty agreements with customers.

Data processing purpose

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To manage and resolve warranty claims	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
Operating our customer loyalty programme	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

	(d) Marketing and Communications	
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
Send customers our newsletters	(a) Identity (b) Contact	(a) Consent

Transmission of electronic user identification data to third-party providers in order to embed content via posts on social networks (e.g. YouTube) and other applications (e.g. Google Maps)	(a) Identity	(a) Necessary for our legitimate interests (to develop our business)
Transmission of electronic user identification data via Facebook Pixel to Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, also for retargeting purposes	(a) Identity	(a) Necessary for our legitimate interests (to develop our business)
Transmission of electronic user identification data to Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA, also for retargeting purposes	(a) Identity	(a) Necessary for our legitimate interests (to develop our business)
Transmission of electronic user identification data to Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA, also for retargeting purposes	(a) Identity	(a) Necessary for our legitimate interests (to develop our business)
Transmission of electronic user identification data to "Instagram," operated by Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, also for retargeting purposes	(a) Identity	(a) Necessary for our legitimate interests (to develop our business)
Transmission to Google (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland) to monitor and prevent fraudulent activity through click fraud, as well as ensuring the proper functioning of our systems, Ads Defender Click Fraud	(a) Identity (b) Profile (c) Usage	(a) Necessary for our legitimate interests (to prevent fraud)
Storage of the IP addresses of users who visit the website for a period of 7 days in order to prevent targeted attacks to overload servers ("denial of service" attacks) and other damage to the company's systems.	(a) Identity	(a) Necessary for our legitimate business interests (maintaining the functionality of our online services)

Customer data used for direct marketing purposes for (additional) products and services provided by us.	(a) Identity (b) Contact	(a) Necessary for our legitimate business interests in growing our business and the customer can opt out of receiving emails; or (b) Consent
---	---------------------------------	--

Cookies

Facebook, Google and Microsoft use a "Pixel" placed by the us for our services to store cookies on the user's device and to identify existing cookies and other identifying information in order to ultimately enrich the profile created for the identifier or user. We do not have access to this data collected by Facebook, Google and Microsoft, but will use them to display ads for the target audience interested in the controller's products.

Changing the purpose

Advertising: please note that we also processes the user's personal data for the purpose of sharing information/direct marketing and for retargeting purposes. Our objective is to provide information about our own products and to advertise them. No incompatibility exists with the purpose of the original data collection. Users and customers may object to the use of their personal data for the purpose of direct marketing at any time and without having to state reasons.

Evaluating customer's personal aspects ("profiling")

None of the user's or customer's personal aspects will be evaluated.

Duty to provide data

When using our website, users have no duty to provide data. During the purchasing process, all required fields must be truthfully completed by a customer.

Automated decision-making

Users and customers are not subject to automated decisions that will have a legal effect on them.

Types of processed data

Provided by customers

Name(s)/company

E-mail address

Address

Date of birth

Bank account information, payment and credit card information, gift certificate information

Phone and fax number

Password (encrypted)

VAT ID

User name

Order information

Refunds

Returned goods

Wish list

Content of messages and customer reviews

Information related to the child: first name/last name, date of birth, gender

Frame number

Information about salesperson

Personal information about bike use

Additionally compiled by controller

IP addresses (log files)

User ID, push ID, device ID

Browser used

Device used

Communication protocol

Information related to the use of the account (e.g. date created, number of logins, data of last inquiry)

Information about purchased products

User behaviour data (view, fav, rate, add to cart, buy), interaction with advertising materials on the website

Operating system used

Cookie IDs

Click IDs

Referrer URL

Data sources (unless provided by the customer or collected by us)

Source

For sending e-mails: "Mailchimp": The Rocket Science Group, LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA <https://mailchimp.com/legal/privacy/>

For customer surveys: SurveyMonkey Europe UC, 2nd Floor, Shelbourne Building, 2 Shelbourne Road, Dublin, Ireland. <https://en.surveymonkey.com/mp/legal/privacy-policy/>

Types of data

IP location, preferred e-mail customer, source of log-in, campaign details (received, opened, clicks)

Information from surveys

External data recipients

Integration of third-party services into the platform: transmission of electronic identification data, especially IP address:

Video embedding on the website, retargeting: YouTube LLC, 901 Cherry Avenue, San Bruno, CA 94066, USA <https://policies.google.com/privacy?hl=en&gl=en>

Retargeting, Ads Defender Click Fraud: Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA, <https://safety.google/privacy/>

Retargeting: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA <https://account.microsoft.com/privacy/ad-settings/signedout>

Retargeting: Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, <https://www.facebook.com/privacy/explanation>

Affilinet: affilinet GmbH, Sapporobogen 6-8, 80637 Munich, Germany, <https://www.awin.com/gb/privacy>

Ads Defender Click Fraud: Hurra Communications GmbH, Wollgrasweg 27, 70599 Stuttgart, Germany, <https://privacy.hurra.com>

Ads Defender Click Fraud: Google Ireland Limited, Gordon House, Barrow Street, Dublin4, Ireland

Payment processing: PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg <https://www.paypal.com/en/webapps/mpp/ua/privacy-full>

Payment processing: Stripe Inc. 185 Berry Street Suite 550, San Francisco, CA 94107, United States, <https://stripe.com/en-at/privacy>

Payment processing: Klarna Bank AB (publ), Sveavägen 46, 111 34 Stockholm, Sweden <https://www.klarna.com/uk/privacy-notice/>

Shipping: General Logistics Systems Austria GmbH, Traunuferstraße 105a, AT-4052 Ansfelden, <https://www.gls-paket.at/imprint/data-protection/>

Shipping: FedEx Express International B.V., Taurusavenue 111, 2132 LS Hoofddorp, Netherlands <https://www.fedex.com/en-at/privacy-policy.html>

Shipping: Österreichische Post Aktiengesellschaft, Headquarters, Rochusplatz 1, 1030 Vienna, Austria, https://www.post.at/en/footer_general_legal_notice.php

Order data processors

IT support: Openfellas GmbH, Brudermühlstr. 14, 81371 Munich, Germany

IT support: Dieter Weitz, Hermannstraße 14, 3400 Klosterneuburg

IT support: Infinite Loop GmbH, Inkustraße 1-7, 3400 Klosterneuburg

IT support: Setlog GmbH, Alleestrasse 80, 44793 Bochum, Germany

CRM: HubSpot Ireland Limited, One Dockland Central, Guild Street, Dublin 1, Ireland,
<https://www.hubspot.com/>

Hosting services: Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Germany

Hosting services: Amazon Web Services EMEA SARL 38, avenue John F. Kennedy, L-1855,
Luxembourg.

Google Analytics (with "anonymize IP") : Google LLC, 1600 Amphitheatre Parkway Mountain View,
CA 94043, USA, <https://safety.google/privacy/>

Customer request management: Help Scout 100 City Hall Plaza, 5th Floor Boston, MA 02108, USA,
<https://www.helpscout.net/company/legal/privacy/>

Content Delivery Network, copies of the websites on servers, Cloudflare, Cloudflare, Inc. (101
Townsend St., San Francisco, CA 94107, USA <https://www.cloudflare.com/application/privacypolicy/>

E-mail campaign distribution service "Mailchimp": The Rocket Science Group, LLC, 675 Ponce de
Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA, <https://mailchimp.com/legal/privacy/>

Data management: Qlik, Qlik Technologies Inc., 211 South Gulph Road, Suite 500, King of Prussia, PA
19406 USA, <https://qlik.com/us/legal/privacy-shield-policy>

QR code creation: qr1.at, owner: Peter Hlavac, Deublergasse 37, 1210 Vienna, <https://qr1.at/dsgvo>

Affiliate programme: Online United GmbH, Bauhofstraße 4, 90571 Schwaig bei Nürnberg, Germany,
<http://www.online-united.de/datenschutz/>

Trusted Shops: Trusted Shops GmbH, Subbelrather Straße 15c, 50823 Cologne, Germany
<https://www.trustedshops.eu/imprint/>

Customer surveys: SurveyMonkey Europe UC, 2nd Floor, Shelbourne Building, 2 Shelbourne Road,
Dublin, Ireland. <https://en.surveymonkey.com/mp/legal/privacy-policy/>

The controller explicitly reserves the right to use additional data processors. These will be disclosed
in the next update to our data protection policy after they have started providing their services. Data
will be processed by data processors under our instructions.

Internal recipients

System administrator

Department

Managing directors

Transfer to third countries

The following data will be shared for data processing purposes performed in countries outside the EU:

Country

USA

USA

USA

USA

USA

Use

Google (EU-US- Privacy-Shield)

Mailchimp (EU-US-Privacy-Shield)

Hubspot (EU-US-Privacy-Shield)

Helpscout (EU-US Privacy Shield)

Cloudflare (EU-US Privacy Shield)

Types of data

IP address, title of website, browser-specific information, information related to website use

E-mail address, name

Customer data, contractual data

Customer data, contractual data, E-mail address, name

IP address, contact and protocol information, security fingerprints and website performance data

Presence on social media channels

Please note that we have an independent online presence on social media channels for advertising purposes and for communicating with customers. For this online presence, the customer's data may be processed outside of the European Union, which increases the risk of data protection violations. Most operators of such social media channels have agreed to comply with the EU/US Privacy Shield Agreement, provided that they are based in the USA.

These online presences are kept accessible in the technical environment of the social media operator in question. Social media operators subsequently use the user visits to the online presence for their own purposes, especially to display (interest-based) advertising. Social media operators benefit from the visit to their channel to place so-called cookies on the customer's device, to read previously placed cookies and identifiers, to infer the customer's interests from his user behaviour and to ultimately enrich the user profile created by the customer or identifier. The goal is to display interest-based advertising to the customer. Such ads might also be shown on third-party websites visited by the customer at a later point.

We have no access whatsoever to customers' data which is provided to third party social media organisations by the customer. We recommend that customers who would like to claim their right to information, rectification, erasure, restriction, objection and data portability contact the respective social media channel directly. Users of social media channels also have the option of making changes to their data protection settings themselves. If needed, the controller will assist customers in making these changes.

Storage and Storage period

We store customer data securely on our IT software systems.

Non-registered customers: personal data (the IP address) of (non-registered) website users will be stored for 7 days for reasons of IT security and will subsequently be deleted.

Contractual relationships as a legal basis: given the above-mentioned legal basis, our distributor and us as data controller, will generally store personal data for up to 40 months after the contractual relationship has ended (= 36 months for possible claims for damages as defined in the agreement + a maximum of 4 months to serve the papers for the lawsuit). Afterwards, they will be deleted (the connection to the person in question will be deleted in any case).

Statutory requirement as a legal basis: if a statutory requirement for storing data, for example, personal data related to invoicing will be processed by us and our distributor at least until the end of the statutory storage period (it is currently generally 7 years after the end of the business year when the data was collected).

Rights of data subjects

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.

- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us .

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to either of the data controllers, via our UK distributor at:

The Little Bike Company Limited

Unit 11 Canalside

Northbridge Road

Berkhamsted

HP4 1EG

Tel: 01442 872 123

Email: woom@littlebikecompany.co.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>