

Privacy Policy

This privacy policy contains information on data protection subject to the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter referred to as GDPR).

We inform you that:

To the extent that your personal data is processed through the functionality of the website <https://e100.eu/ee/lp/generic/ee-ee/> to which this information refers (the "Website"), by accepting the data processing principles (the "Information") displayed on it after it has been loaded and by providing voluntary, unequivocal and informed consent to data processing, you, as the user, acknowledge and agree that your personal data controller is Baltia Trading Company OÜ (ENG name: Baltia Trading Company LLC) , with its registered seat in Republic of Estonia, Haarju county, Tallinn, 11415, Lasnamäe district, Väike-Paala 1 St., registered in the Estonian commercial register under number 14375399, hereinafter referred to as "E100 BTC" or "Controller".

Considering abovementioned, E100 BTC is controller of your personal data collected and processed through the Website, it determines the purpose and scope of personal data with due regard to the legitimate interests, if any, or your voluntary, unequivocal and informed consent to the processing rules.

To contact the Controller regarding the personal data processing received through the Website, send an email to gdpr@e100.eu.

What kinds of personal data do we process?

Registration on the Website and personal data disclosure is voluntary, but necessary to contact us through the contact form (telephone number or e-mail address) or to use our services through the Client Account.

In addition, on the Website, we also collect information contained in cookies and in server logs (for example, the IP addresses of endpoint devices).

Through the Website, we collect information contained in system logs (e.g. IP addresses of end devices) and in Cookies, information about the type of operating system, URLs of websites from which users were redirected, information about actions taken during visits to the website and dates and times of visits on page. A "cookie" is a text file placed on a computer's hard drive or in the memory of a mobile device by a website or server. The user may delete the 'cookies' processed by our Website at any time through the settings of his web browser.

Please note that recommended cookie settings for Website contain consent for content & behaviour performance analysis (profiling) and the delivery of personalized content, i.e. advertising, is carried out with the use of tools such as Meta Pixel, Hotjar, Google Analytics.

With regard to the collection of anonymous data and its processing on the basis of your consent, your data may be transmitted (shared or transferred as per applicable grounds for processing) via the functionality of our websites to the following companies:

- Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, D2 Dublin, Ireland
- Hotjar Ltd., 5th Floor, Dragonara Road, Paceville St Julian's STJ 3141, Malta
- Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

Our site may use plugins, analytical tools and other social media tools provided by popular social networks. When entering the website containing such a plugin (Meta Pixel, Hotjar, Google Analytics), your browser establishes a direct connection to the social networks servers. The content of the plugin is sent directly to your browser by the relevant social network operator and is integrated with our website, and the social network provider is informed that your browser has visited our website, even if you do not have a profile on that social network or are not currently logged in to your profile. In this case, the data, including your IP address is transmitted by your browser directly to the server of the corresponding social network and stored there (some servers may be located in a third country within the meaning of GDPR), and the data is sent using "Like" or "Share" buttons to the server of the social network administrator may be published in the corresponding social network and thus shared with your contacts. Privacy settings and your rights in this regard are governed by the appropriate social network.

User can personalize your data processing preferences for the websites we manage through your browser settings. In addition, you can use the blockers indicated below.

- user can influence the data analysis solutions using 'cookies' used on our websites by using cookie placement and tracking blockers such as: Adblock Plus: (<https://adblockplus.org/>) using the options of such solutions.
- user can, if desired, deactivate pixel tags by configuring his web browser so that images are not displayed, and disable JavaScript;
- user can influence the data analysis by using browser add-ons to disable plugins: <https://tools.google.com/dlpage/gaoptout>
- in the case of Hotjar Ltd. solution, if you have given your consent, we do not collect your personally identifiable data and data from forms, but if you are concerned, any user may use the "Do Not Track" option that Hotjar has provided for every internet user – ("Do Not Track" – <https://www.hotjar.com/policies/do-not-track/>).
- Logging out of the social network before visiting our websites with plugins that establish a direct connection to the servers of such controllers will prevent the direct attribution and sharing of your social network profile data. If user does not want its data to be processed with help of such plugins, it may use either program or plugin blocking such script;

Without prejudice to the information provided above and in case of consent, subject to the scope of consent provided, the Controller process the data provided by users taking into account the principle of data minimization expressed in Article 5. sec. 1 point c) GDPR.

Legal basis for personal data processing

With due regard to the activities performed, the Controller process your personal data for various purposes as prescribed by law. You may provide us exclusively with data for processing in accordance with applicable law, including the GDPR. Hereby we inform you that we process the data based on:

- the consent to the extent given in E100 Information (so-called "pop-up cookie") which appears when you visit the Website, or on the Website consent forms, provided that you give such consent directly to the Controller or E100 Partners (as applicable) pursuant to Article 6(1)(a) GDPR;
- the consent given by you in the E100 Client Form to the extent not processed through the functionality of the Website in accordance with Article 6(1)(a) of the GDPR;
- goals for contract conclusion which the data subject is a party to, performance of such contract, or for actions to be taken at the request of the data subject prior to the conclusion of the contract, i.e. in accordance with Article 6(1)(b) of the GDPR;
- performance of the legal obligations imposed on the Controller, as prescribed by Article 6 (1) (c) of the GDPR;

- the Controller legitimate interests protection in accordance with Article 6(1) (f) of the GDPR;

The Requirement to inform on personal data processing is met by putting on the Website the E100 information (so-called "cookie pop-up") and this Privacy Policy.

Purpose of data processing and other controllers

The customer informed about the rules of data processing, including the information clause for representatives (<https://e100.eu/en/e100-data-aware-clause>) grants explicit consent to the processing of personal data regarding contact forms for the purpose of discussing or ordering the services of Controller, or, in case of customer consent, other entities of E100. For this purpose, the customer may also be contacted via e-mail address or telephone number provided in the form.

The processing of personal data is necessary for the purposes of observing the legitimate interests of the Personal Data Controller, including, but not limited to, processing of personal data entered in the contact forms present on the Website in order to present commercial information regarding the offer of services provided by the Controller or, in case of customer consent, other entities of E100. Processing may be also connected with ensuring technical functionality of the Website, its maintenance, debugging, fraud prevention.

Retention period for personal data

Personal data provided to the Controller via the Website may be stored by E100 BTC for no longer than a period appropriate to the legal grounds applicable to them, indicated in art. 6 GDPR. Regardless of this, the Website user has influence on the length of data processing in the field of 'cookies' and can delete data used by the Website using the functionality of his web browser.

What rights do you have?

The right to access data.

You have the right to receive information about the processing of your personal data and to receive a copy of your data that we process, in accordance with art.15 of GDPR. If we do not process your personal data, you are entitled to receive confirmation.

The right to correct data.

You have the right to correct or supplement personal data that is inaccurate or insufficient for the purposes of processing, in accordance with art.16 GDPR.

The right to delete data.

You may ask for your personal data to be deleted or exercise the "right to be forgotten", in accordance with Art.17 sec.1 or 2 of GDPR. Your data will be deleted if there is no legal reason to keep it. If your personal data is processed in accordance with your consent, you have the right to withdraw your consent at any time. In order to withdraw your consent, please send an email to gdpr@e100.eu

The right to request the restriction of data processing.

You have the right to request the restriction of your personal data processing. If the restriction is requested, the Controller will only store the personal data in accordance with art.18 of GDPR. You can make a request for restriction, for example, if you have doubts about the correctness of the data, the lawfulness of its processing or you have filed an objection to the processing and your request is still under consideration.

Right to object.

You have the right to object to the processing of your personal data in order to comply with the legitimate interests of the Controller with respect to your specific situation, i.e. to the processing of personal data under Article 6(1)(e) or (f) GDPR, including profiling, as per provisions of art.21 section 1 of GDPR. You can object to the processing of your personal data for direct marketing purposes at any time.

The right to have the personal data transmitted.

You have the right to receive your personal data and have it transmitted to another controller, as per provisions of art.20 of GDPR.

Telephone calls and commercial information

E100 BTC conducts direct marketing or we send information that may be classified as commercial information via electronic means of communication, only based on the prior consent of the data owner, which we use for this purpose, i.e. the telephone number or email address provided for contact.

It is common practice for E100 BTC to monitor telephone conversations and, in some cases, record such interactions for staff training or quality control purposes, or to preserve evidence of a specific transaction or interaction, which we inform our callers of.

Data exchange

We do not sell or otherwise disclose our users personal data that we collect, except for the cases described in this document or disclosed to the user at the time of data collection. We exchange data for the purpose of conducting transactions or performing other activities as part of business relationshipы. In accordance with the principles of data transfer to third countries in the meaning of GDPR, we may share the personal data we collect with the companies of the group, commercial affiliates, subsidiaries, vendors, suppliers and other organizations involved in the contracting process with clients. We may also share this data with our service providers who perform services on our behalf. We do not authorize such service providers to use or disclose this data, except as necessary to perform certain services on our behalf or to comply with requirements of the applicable legislation. We require such service providers, within the framework of their contract, to adequately protect the confidential and personal data that they process on our behalf.

We may share data with business partners with whom we do business. These business partners may contact the user regarding products or services in which the user may be interested. Such third parties may use personal data in accordance with their own privacy policy. When using such features, we recommend the user to read the third party privacy policy . We reserve the right to transfer personal data in the event we sell or transfer all or part of our business or assets. In the event of such sale or transfer, we will make reasonable efforts to instruct the recipient to use the personal information received from the user in accordance with our privacy policy. Upon completion of such sale or transfer, the user may contact the company that received the user's personal data for any questions related to the processing of that data.

User rights and choice

The user has the rights to his personal data that we store. We allow users to choose which personal data we collect.

The User may decide not to disclose their personal data to E100 group by refusing to provide consent when interacting with E100. You have the right to refuse to use cookies to assign a unique identifier to your computer when you use our websites to avoid aggregation and analysis of data collected on our sites.

The user may opt-in or opt-out email marketing through the websites, and may receive or unsubscribe from marketing emails following the instructions for subscribing and unsubscribing from promotions. The user can also opt out of receiving promotions. The user may revoke any previously given consent or at any time legally prohibit us from processing his/her personal data. From this point on, we will adhere to the preferences expressed by the user. In some cases, the withdrawal of consent to the use or disclosure of your personal data will mean that the user will not be able to use certain products or services offered by us.

If the user is located in the European Economic Area, the user may prohibit us from transferring his or her personal data to third countries, except: (i) to service providers we have hired to provide services on our behalf, (ii) if we sell or transfer all or part of our business or assets and a new administrator becomes a party to the user's contract (iii) if disclosure is necessary for good reasons in the public interest, or (iv) if we believe such disclosure is necessary or appropriate in connection with the investigation of suspected fraud or other illegal activity. If the user is located in the European Economic Area, we will use his personal data only for the purposes stipulated by the terms of our privacy policy and other conditions that the user has been notified about, unless we have other grounds, for example, consent, to use data for other purposes. If required by law, E100 obtains prior consent to the collection of (i) personal data for marketing purposes.

Information security

All user information can be transmitted and stored in a secure E100 database located on servers in the European Union. If we transfer user data to other countries, we will protect it in accordance with the Privacy Policy applicable to our website, including the Data Protection Policy. The data we collect may be transferred outside the country of origin of the user with his or her consent provided in accordance with the GDPR. Data may also be processed by employees working outside the user's country of origin who work for us or for any of our suppliers in order to prevent data transfer without explicit consent. These employees may be involved in, among other things, fulfilling user orders, processing payment information, and providing support services. By providing the personal data, the user gives consent to the transfer, exchange, storage or other processing of the data. If a user provides us with personal data of his/her company employees or individuals, we can reasonably assume that the user is acting as the administrator of that data and is responsible for obtaining their consent to act as such. We will take all reasonable measures to ensure the safety of user data and their protection in accordance with this privacy policy. E100 has a data protection program designed to (i) ensure and maintain the confidentiality of user personal data; (ii) protect personal data against security threats and risks to integrity; (iii) protect against unauthorized access to or use of personal data that could cause serious harm to the user or his/her company; and (iv) comply with applicable law. Our contracts with suppliers and service providers bind them with the obligations to protect the user's personal data.

Unfortunately, the transmission of information over the Internet is never completely secure. Although we will do everything possible to protect the user's personal data, we cannot guarantee 100% security of the data transmitted through our sites. The user provides this data to some extent at his or her own risk. We take all reasonable precautions, including appropriate technical, administrative and physical procedures, to protect the user's personal data from loss, misuse or alteration. The information that the user provides to us is stored on our secure servers.

Under applicable law, users have the right to request access to their personal data that we store, to update and correct inaccuracies in their personal data, and to request that data be blocked or deleted. In some cases, the user's right to access personal data may be restricted by local legislation. To update your preferences, request the removal of your information from our contact list, or make a request, contact us by email.

Our contact details

If you wish to opt out of receiving e-mail, fax or telephone messages from us, or want to update your personal data, ask to delete such data or find out some information about the data that we store, please write to gdpr@e100.eu. If you have further questions about this privacy policy or would like to file a complaint, please email us at gdpr@e100.eu or by sending corr.

Information about automated decision-making

Your personal data is used for automated profiling purposes with due regard to your consent and legitimate interests of the Controller to better understand the web traffic on the Website and tailor our offers to your needs.

Contact the Controller

For questions related to the processing of your personal data, including those obtained through the Website, you can contact the Controller responsible for maintaining the register of personal data processing by e-mail: gdpr@e100.eu or by sending a letter to:

Baltia Trading Company OÜ
Haarju county, Lasnamäe district,
Väike-Paala 1 St., Tallinn, 11415, Estonia

Without prejudice to the aforementioned, you can also contact the Controller in view of data processing.

The right to lodge a complaint with a supervisory authority

If you believe that the processing of personal data infringes the GDPR, you may lodge a complaint with a supervisory authority in Estonia - the Estonian Data Protection Inspectorate (DPI).

Changes to the Privacy Policy

We may update our privacy policy from time to time. We update it to meet the changes in our business activities. If there is a change in the way we use the personal information that users provide to us, or if the purposes or subjects to whom we disclose this information change, we will post a notice of such change on our Website, and continued use of the Website constitutes user acceptance of the changed policy applicable to the Website.