

Privacy policy

Thank you for using our website! We (Oldtimer Wheels) want to protect your privacy (hereinafter “you”, “individual” and “data subject”), so please read the following Privacy Policy to better understand how we collect and use personal data. We collect and manage personal data with the goal of incorporating our company values: transparency, accessibility, and usability. By using our Site, you agree to these Privacy Policy, which applies to your use of located at www.oldtimer-wheels.com (hereinafter “Site”), including any content, functionality, products, and services on or via Site. Should you disagree with some of the provisions herein, you can either leave the Site or contact us at info@oldtimer-wheels.com.

All our activities are in accordance with the European legislation (Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter: GDPR), Conventions of the Council of Europe and national legislation of the Republic of Slovenia (Personal Data Protection Act (ZVOP-1), Electronic Commerce Market Act (ZEPT) and all other relevant legislation).

Definitions

Personal data means any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Processor is a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.

Recipient is a natural or legal person, public authority, agency, or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

Third party is a natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Name and Address of the Controller

Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is owner of Oldtimer Wheels:

CROMA, obnova in trgovina, d.o.o.
Opekarna 28A
1420 Trbovlje
Slovenia

Lawful Basis for Processing and Why Do We Use Your Personal Data?

We process personal data only for the purposes for which it was collected and in accordance with this Privacy Policy. We take reasonable steps to ensure that the personal data we process is accurate, complete and current, but we depend on you to update or correct your personal data when necessary.

The lawful bases for processing personal data are set out in Article 6 of the GDPR. Whenever we process your personal data one of these below stated lawful bases applies for below stated purposes.

Based on explicit individual's voluntary consent, we process personal data for below stated purposes:

- processing of individual's request for free trial or request to access enterprise information or financial information
- notifying individuals about company news, updates, information about related product or service, financial information, and other information, that individual requests
- to provide, maintain, improve, develop, and protect our products and services
- fulfilling your requests
- to review job applications, you have signed up for

We process personal data based on contract when it is necessary for below stated purposes:

- concluding and implementing of the contract
- informing individuals about successful orders
- providing our products and services
- resolving complaints

When necessary we process personal data based on legal interests for below stated purposes:

- optimization of the Site

- to ensure the network and information security of the IT systems
- to prevent fraud

We process personal data based on legal obligation for below stated reason:

- retention of personal data regarding the purchase in accordance with applicable law, such as a fulfilment of tax obligation

What Types of Personal Data Do We Collect?

We ask for and collect the following personal data:

- Name and Last name
- Shipping address (street, state, country)
- e-mail address
- Phone number
- IP address
- Company name, which enables identification of individual

We also process non-personal information:

We collect anonymous data from every visitor to monitor traffic and fix bugs. This information is used to help us understand who uses our website, to improve and market our website in general and our online products and services. We collect information like web requests, the data sent in response to such requests, the browser type, the browser language, a timestamp for the request and other anonymous statistical data involving the use of our website. This information by itself cannot be used to identify or contact you. We may combine automatically collected and other non-personal information with personal data. In that case we will treat the combined information as personal data under this Privacy Policy and it will be used for marketing purposes.

Automated Decision Making and Profiling

We do not process personal data for automated decision making and profiling.

Will We Sell or Give Your Personal Data to Third Parties?

We are not in the business of selling your personal data. We may share your personal data with third parties only as set forth in this Privacy Policy. We share it:

- To our service providers, business partners and contractors who provide services on our behalf or who we use to support our business (e. g. shipping companies, delivery services/agents etc.). When agreeing about the business terms, you also provide consent, we may share your personal data with those third parties.
- We may report to law enforcement agencies any activities that we reasonably believe to be unlawful, or that we reasonably believe may aid a law enforcement investigation into unlawful activity. In addition, we reserve the right to release your personal data to law enforcement agencies if we determine, in our sole judgment, that either you have violated our policies, or the release of your personal data may protect the rights, property, or safety of Oldtimer Wheels or another person. We will disclose personal data that that law enforcement agencies require case to be disclosed.
- We may disclose your personal data to comply with a law, regulation or compulsory legal request, to protect the safety of any person from death or serious bodily injury, prevent fraud or misuse of products or services or its users or to protect our property rights. We will disclose personal data to government entities, or third parties based on judgments of courts or tribunals or decisions of

administrative authorities or another binding act. We will disclose personal data that previously mentioned entities require case to be disclosed.

Children Data

We are committed to protecting the online privacy of children and making the internet safe. We do not provide products and services to children, or knowingly collect or solicit personal data from children under 15 years of age. Any communication we get that is identified as being from a child under 15 will not be kept by us. We encourage parents or guardians of children under 15 to regularly check and monitor their children's use of email and other activities online.

How Do We Protect Your Personal Data?

We appreciate your trust in sharing your personal data with us and are committed to protecting it. We take appropriate security measures to protect against unauthorized access or unauthorized alteration, disclosure, or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures as well as physical security measures. We restrict access to personal data to our employees, service providers and agents who need to know that personal data to operate, develop or improve our services. We use secure socket layer (SSL) technology to encrypt and protect your personal data.

Note that our Site offers links to other websites not owned or operated by us. Your use of these third-party services is entirely optional and at your risk. We are not responsible for the privacy policies and/or practices of these third-party services.

Data Retention

We store your personal data for as long as it, in our discretion, remains relevant to its purpose. We may store anonymized information longer, but only in a way that it cannot be tracked back to you. We store personal data in accordance with applicable law.

Retention for personal data may vary depending on the applicable sectoral legislation (eg. tax, accounting legislation). In the case where the applicable sectoral legislation establishes mandatory duration for retention of personal data, we will delete it after the expiration of that mandatory duration.

How Can You Update or Remove Your Personal Data?

You can update or remove your personal data or opt-out at any time.

- Updates: If you still wish to use our products and services and your relevant personal data (name, e-mail, postal address, telephone number, etc.) changes, please let us know at info@dtimer-wheels.com
- Personal data removal: If you wish to completely remove your data from our collections please send us a deletion request at info@dtimer-wheels.com

Your Rights as The Data Subject

In relation to your personal data that we process, you have the right:

Right of Confirmation and Access

You have the right to obtain from us the confirmation as to whether personal data concerning you is being processed. If it is, you have the right to obtain from us free information about your personal data stored at any time and a copy of this information.

Right to Rectification

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. Considering the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement

Right to Erasure (Right to Be Forgotten)

You have the right to obtain from us the erasure of personal data concerning you without undue delay, and we shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- When you withdraw consent and where there is no other legal ground for the processing.
- You lodge an objection to the processing and there are no legitimate grounds for processing.
- The personal data have been unlawfully processed.
- The personal data are those collected from children as part of information society services.

Insofar as we, the controller, made personal data public and we are required to delete them, we will take into account all available technology and the cost of implementation, take reasonable steps, including technical measures, to inform other controllers processing the personal data that you have requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. We will arrange the necessary measures in individual cases.

Right of Restriction of Processing

Each data subject shall have to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data.
- The processing is unlawful, and you oppose the erasure of the personal data and you demand instead the restriction of their use instead.
- We no longer need the personal data for the purposes of the processing, but you require them to assert, exercise or to defend legal claims.
- You have objected to processing and it has not yet been determined whether the legitimate grounds of the controller override yours.

Right to Data Portability

You have the right to receive the personal data concerning you, which was provided to a controller, in a structured, commonly used, and machine-readable format. You have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent or contract and the processing is carried out by automated means.

Furthermore, in exercising your right to data portability, you have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

Right to Object

You have the right to object, on grounds relating to your particular situation, at any time, to processing of personal data concerning you, if the task is carried out in public interest, if the processing is for the exercise

of official authority vested in us or for our legitimate interest (or those of a third party). This also applies to profiling based on these provisions.

Oldtimer Wheels shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If Oldtimer Wheels processes personal data for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If you object to Oldtimer Wheels to the processing for direct marketing purposes, Oldtimer Wheels will no longer process the personal data for these purposes.

Automated Individual Decision-Making, Including Profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you, or similarly significantly affecting you, as long as the decision is not necessary for entering into, or the performance of, a contract between you and us, or is not authorized by Union law to which we are subject to and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests, or is not based on your explicit consent.

Right to Withdraw Data Protection Consent

You have the right to withdraw your consent to processing of your personal data at any time.

Right to Appeal

Independent of the above stated rights and independent of other remedies you, as data subject, have the right to appeal to a supervisory authority if you believe that the processing of your personal data violates the data protection regulations.

Should you wish to report a complaint or if you feel that we have not addressed your concern in a satisfactory manner, you may complain to the competent state authority: Information Commissioner of the Republic of Slovenia (Zaloška 59, 1000 Ljubljana, telephone: 01 230 97 30, fax: 01 230 97 78, e-mail: gp.ip@ip-rs.si).

For all stated rights, you may contact us at:

- Email: info@dtimer-wheels.com

Event of a Breach of Security

While we strive to protect your personal data, we cannot guarantee its absolute security. Despite our efforts, there remains the possibility that personal data may be accessed, altered, disclosed, or destroyed due to a security breach. In the unlikely event of a breach of security, and we have a way and (if required) your permission to do so, we will notify you by email if your personal data was involved in any way. We are not responsible for the functionality, privacy, or security measures of any other organization.

If the event of breach of security occurs, we shall inform the competent supervisory authority, unless if it did not endanger the rights and freedoms of individuals. When there is a suspicious doubt that a crime was committed, we will inform the police and/or prosecutor's office.

What Are Cookies and Do We Use Them?

Cookies are small text files placed on your hard drive. We use cookies or similar technologies (pixels etc.) to personalize your online experience and improve our services to you. For example, cookies will remember and process the items in your shopping cart on our website. This saves you time, since you are not required to re-enter the same information each time you visit our Site.

[Here is a list of cookies](#) by Google Analytics, including Third-Party explained technologies that allow us to improve the overall user experience and tailor it to suit your browsing history.

Google Analytics

On our Site, we have the component of Google Analytics. Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behaviour of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website and to carry out a cost-benefit analysis of Internet advertising. [More about Google Analytics privacy policy.](#)

Google Tag Manager

We use Google Tag Manager on our site, to support the usage of Google Analytics. The Google Tag Manager system itself does not collect any user information. More information can be found here.

Can You Reject All Cookies?

You can modify your browser settings to control whether your computer accepts or declines cookies. If you choose to decline cookies, you may not be able to use certain interactive features of our Site. Note that you can always go back and delete cookies from your browser; however, that means that any settings or preferences controlled by those cookies will also be deleted and you may need to recreate them.

Links to Other Sites and Services

Our Site sometimes offers links to other company's services. Those companies have their own privacy and cookie policies, so remember that the information and personal data you give them will follow their rules and our Privacy Policy does not apply to them.

Change of Privacy Policy

We may amend this Privacy Policy. Use of personal data we collect now is subject to the Privacy Policy in effect at the time such personal data is used. If we make changes in the way we collect or use personal data, we will notify you by posting an announcement on Site. You are bound by the changes to the Privacy Policy when you use services after such changes have been first posted. This Privacy Policy was last updated on July 25th, 2020.