

# Aru Group AS

## **Privacy Policy**

Aru Grupp AS values all of its customers and respects their right to privacy, including the protection of personal data.

Our activities are guided by the General Data Protection Regulation (GDPR, EU 2016/679), the Personal Data Protection Act (PDPA), and other established data protection regulations. This privacy policy is addressed primarily to the data subject, i.e. the natural persons whose personal data is processed, within the meaning of the GDPR and the PDPA.

The following provides a simple overview of what happens to your personal information when you use, have used or have expressed a desire to use the Services or are otherwise involved in the use of any Service or when you visit our website.

Personal data is any data from which you can be personally identified.

We do our best to make our positions easy to understand and disambiguously understandable.

## Who is responsible for collecting data on this website?

The website operator, Aru Grupp AS, is committed to protecting your privacy. The data collected on the websites of Aru Grupp AS is processed by the website administrator and controller Aru Grupp AS, registry code 10108425, address Rakvere tee 12, Hulja, Kadrina parish 45203, Lääne-Viru county, e-mail address: <a href="mailto:info@arugrupp.ee">info@arugrupp.ee</a>

#### Data collection on our website

Some data is collected when you provide it to us. This may include, for example, data you provide to request a quote or receive a quote, or when creating a client account.

Other data is collected automatically by our IT systems when you visit the website. This data is mainly technical data, such as the browser and operating system you are using or the time when you accessed the page. This data is collected automatically as soon as you enter our website.

## We use the following methods to collect information:

We collect and process personal data in the following situations:



- When using the website, you, as the User (Client), will be asked for permission to use information about you. When you share your information with us, you give us the right to use the information about you.
- Customer communication, management of offers and orders, including purchase history.
- Applying for a job.
- Website usage information technical data collected using cookies and analytics tools.

The information collected about you (the Client) includes:

- Name (first and last name)
- > Phone number
- Email address
- Physical delivery address (street, house, apartment, county, postal code), for delivery of services and goods
- information collected by website cookies

#### **Cookies**

We create and store User cookies to make the website more user-friendly. A *cookie* is a small data element that is sent from a website and stored on a user's web browser, mobile phone, or other device. Cookies enable many functionalities on our websites and help us provide a smoother user experience.

We use cookies that are necessary for the website to function and to measure website performance and provide a more personalized experience, and cookies that enable targeted marketing. Below we have outlined the different categories of cookies used on our websites. The most commonly used applications are also described under each category.

## Categories of cookie use and for what purposes we use cookies

#### **Necessary cookies**

These cookies are necessary for the website to function and for you to navigate around the website. The website will not function properly without these cookies. These cookies cannot be disabled. These cookies do not store personal information.

## Functionality and user experience cookies



We use functionalities on the website that are activated when you enable cookies. These cookies collect anonymous information about how visitors use our website. Thanks to these cookies, we can improve the user experience by providing relevant content and changing how the website works or looks. These cookies do not store personal information.

They are used to collect statistical data on website usage, loading times, etc. The cookie stores a unique identifier to recognize users when they revisit the website over time. The data is anonymous and not linked to any identified person.

Google Analytics cookies register a unique ID and collect statistical data about how visitors use the website. It also tracks users across devices and marketing channels and collects data about visitors' devices. These cookies do not store personal information.

## **Google Analytics EU data processing**

## Third-party cookies

On the website we use content from other websites (e.g. Google Maps, Youtube). Third-party content may redirect you to other websites that use their own cookies. We have no control over the placement of cookies by other websites.

Third-party services for data collection operate according to their terms and conditions.

#### **Google Cookie Policy**

#### Facebook and Instagram Cookie Policy

#### How to choose and control cookie settings?

- If you want to completely disable the storage of cookies in your web browser, you must choose to disable cookies in your web browser's Security settings.
- If you choose to disable cookies in your web browser, no cookies will be stored in your web browser by either Aru Grupp or other websites. However, this means that not all website functionalities may be available and usable to you. Also, some features may not work if you use a tracking blocking application that prevents cookies from being saved. Therefore, we do not recommend using them on Aru Grupp sites and do not recommend refusing to save all cookies in your web browser.



• You can change your browser settings so that you receive a notification each time a website attempts to save a cookie. You can then decide whether to enable this cookie or not.

#### What we do with the information we collect

We use the collected information for the purpose of providing the service. Accordingly, we do not collect data about Users that is not necessary to provide the service. User-related information is available on an as-needed basis:

- For the user
- For order reviewers
- For the website administration partner
- For the partner providing transportation services
- For the partner providing installation services
- For the partner providing after-sales and warranty maintenance services

All related partners share similar principles with us and store and process User's personal data on the same fundamental principles. To protect the interests of the User, personal data is handled between different parties only on the basis of a contract.

We use customer data for production, invoicing, and accounting purposes.

For partners providing logistics, installation, after-sales and warranty maintenance services, the User's data is important for the purpose of providing the service. Without collecting key data, service provision is impossible.

When collecting statistical data, we kindly consider the User's interest in receiving a more user-friendly service and the problem-free operation of the website. Statistical data allows us to analyze Users' behavior patterns when using the web service, allowing us to see which content pages are used the most and where Users encounter shortcomings.

#### How and when we share data

By using our services, you agree that your data may be used to provide services to third parties. Information related to the User is exceptionally available only to the User, the order reviewer, the partner administering the website, and the partner providing transportation, installation, warranty, and after-sales service.



Aru Grupp AS shares User data with official authorities if there is sufficient reason to believe that the User's behavior is malicious towards the company or other Users.

Communication with banks for the purpose of paying for purchases is encrypted to ensure the security of the User's personal bank details. The administrator does not have access to banking information.

In other cases, we will only transfer personal data to third parties if we have the consent of the person whose data is being transferred.

## International transfers of your data

Your personal data will be stored primarily in Estonia, within the territory of the European Union and the European Economic Area. Due to the international nature of our business and technological solutions, and for the purposes set out above, we may in certain cases transfer personal data to partners located in other countries. All such transfers will be in accordance with the privacy rules applicable to international data transfers.

## How long do we store User information?

The data is actively used in the interests of the Client and during the period when the use of the data is necessary to fulfill the purpose of providing the service. In the interests of the Client, the data storage period is not limited in time. Data deletion is carried out in the form of a written request from the client, which is sent to the address info@arugrupp.ee.

As part of the data deletion process, we apply the process to all related systems.

#### Your rights as a User regarding the management of your data

As a Client, have the right to access your personal data at any time by submitting a request to the following address: <a href="mailto:info@arugrupp.ee">info@arugrupp.ee</a>. However, under applicable law, there may be some data you may not have the right to access, rectify or delete.

The Client has the right to withdraw their consent to the processing of personal data at any time, unless the processing of personal data is permitted by law without your consent. Withdrawal of consent does not affect the lawfulness of data processing carried out on the basis of consent before withdrawal.



If you find that your personal data is not being processed in accordance with the terms of the contract or the procedure prescribed by law, you have the right to demand that the service provider, Aru Grupp AS, cease processing and providing access to your personal data and delete the collected data.

The Data Protection Inspectorate supervises the protection of personal data. If you find that the processing of your personal data infringes your rights and interests, you have the right to file a complaint with the Data Protection Inspectorate in Estonia at <a href="https://www.aki.ee">www.aki.ee</a>, but we recommend that you contact us first to resolve any issues that arise.

#### How to contact us

If you have any questions regarding our privacy policy, please contact us: <a href="mailto:info@arugrupp.ee">info@arugrupp.ee</a> or by phone +372 3295 640

## **Privacy policy updates**

If necessary, we have the right to make changes to the privacy policy. We will change the privacy terms on our website after the privacy policy is updated. If you continue to visit and use our website after we update our privacy policy, we will treat this as your tacit consent to the changes.

Last modified 31/03/2025