PRIVACY POLICY AND COOKIE STATEMENT - VIDAXL.IE

Version 2025.1

This Privacy Policy and Cookie statement applies to the Processing of Personal data in connection with purchases and activities on this website.

The website is operated by vidaXL International Marketplace B.V., a company registered in the Netherlands, and which facilitates transactions and operates the online sales platform. Products sold through the website are offered by vidaXL International B.V.

Throughout this Policy, "vidaXL" refers to vidaXL International Marketplace B.V., vidaXL International B.V. and, where relevant, to other vidaXL related entities involved in operating, servicing, or supporting the Webshop.

SUMMARY:

Category	Details		
Who Collects Data?	vidaXL International Marketplace B.V. (Webshop operator), vidaXL International B.V. (Product seller), Other third parties depending on interaction (see Section 4 of policy).		
Legal Basis & Processing Processing Scenarios	Contract performance, legal obligation, legitimate interest, consent, or judicial claims. Examples: Visitors → IP, device, behaviour data (analytics/personalization) Customers → Contact data for order & support Account holders → Login, order tracking, fraud prevention Orders/Payments → Billing & delivery info processed securely Auctions → Bidding data collected to ensure fair use Wish lists → Stored to personalize experience Reviews → Shared directly or via partners, used for verification Customer service → Calls, emails, chats logged; calls may be recorded Newsletter → Sent via consent or legitimate interest		
Data Sharing	Shared with joint/independent controllers (e.g. payment, delivery, marketing), Processors (e.g. CRM, hosting, chat tools), subprocessors and other recipients (e.g. fraud monitoring, authorities).		
Your Rights	Access, rectify, erase, restrict, object, request portability, Lodge complaint with Data Protection Authority. Contact vidaXL using details in full policy.		
International Transfers	Data may be transferred outside the EEA with safeguards such as Standard Contractual Clauses.		

Category	Details
Data Retention	Retained only as needed, e.g. 10 years for tax, 2 years for inactive accounts. See Section 7 for details.
Security Measures	Technical (SSL/TLS), organizational (staff training, limited access), Monitoring, data minimization, incident response planning.
Cookies & Trackers	Used for functionality, analytics, personalization, ads. Managed via cookie banner or browser settings. See Section 9 for full details.

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1. DEFINITION.

In this Privacy and Cookie statement, the following terms are used with the meanings defined below:

Webshop: The online store accessible via www.vidaXL.ie and any other website, application,

or URL designated by vidaXL for the online sale of products.

Interaction: The use of features on the Webshop such as creating a Wish List, completing a

Checkout, subscribing to the Newsletter, using "My Account," participating in Auctions, using the Chat function, or engaging with other interactive

functionalities.

Webshop Visitor: a customer visiting the Webshop for the first time that does not interact with the

Web Shop.

Webshop a customer who interacts with the Webshop.

Customer:

Account: the account a customer must create through the Webshop to be able to place an

order.

Privacy Policy vidaXL's Privacy Policy and Cookie Statement.

and Cookie

Statement:

All terms used in this Privacy Policy and Cookie statement that are defined in the General Data Protection Regulation (EU) 2016/679 (hereinafter referred to as "GDPR") shall have the meaning assigned to them in the GDPR, including but not limited to: "Personal data", "Processing", "Pseudonymisation", "Recipient", "Third Party", "Consent", "Personal data breach", "Supervisory Authority", "Crossborder processing", "Controller", "Processor", "Data subject", and "Data Protection Officer".

2. Who collects personal data?

- 2.1 Your Personal data may be collected and processed by multiple parties depending on how you interact with the Webshop.
- 2.2 Responsibility for your data.
- 2.2.1 Main Controllers (collectively referred herein as vidaXL):
 - **vidaXL International Marketplace B.V.:** as the operator of the Webshop, vidaXL International Marketplace B.V. is the primary Controller for Processing that occurs via your use of the Webshop and its features.
 - **vidaXL International B.V.:** the company that sells the products listed on the Webshop is also alternatively a joint or independent Controller with vidaXL International Marketplace B.V. for all activities related to the order, delivery, customer service, invoicing and any after-sales services.
- 2.2.2 Other entities involved. Depending on your Interaction, your data may also be processed by other entities the list of which is provided under article 4.

3. LEGAL BASIS AND PROCESSING ACTIVITIES

3.1 LEGAL BASIS

We process your Personal data only when we have a valid legal basis. Under the GDPR, the following lawful grounds may apply:

Legal Basis	Explanation
Contract Performance	To fulfil a contract or to take steps at your request before entering a contract
Legal Obligation	To comply with legal and regulatory obligations
3 3	When we (or a Third Party) have a business or commercial reason to use
Legitimate Interest	your data, balanced against your rights
Consent	When you have given clear and explicit permission
Legal Claims	When necessary to establish, exercise, or defend legal claims
Public Interest	Not applicable to our current Processing activities

3.2 OUR PROCESSING & REASONS

In the below tables, we have highlighted the core types of data and how they're processed by vidaXL.

3.2.1 WEBSHOP VISITORS (collection may vary depending on your cookie settings).

Data	Purpose	Legal Basis
IP Address, Device Type,	To optimize the user experience,	
Referrer, Country, Browsing	load correct version, analyse	Legitimate interest, Consent
Behaviour	Webshop usage, and display ads	

3.2.2 WEBSHOP CUSTOMERS. Same as above, plus:

Data		Purpose		Legal Basis				
Contact	info,	Preferences,	Order	fulfilment,	personalized	Contract,	Legitimate	Interest,
Ordered P	roducts		sugges	tions, custo	mer support	Consent		

3.2.3 ACCOUNT HOLDERS

Data	Purpose	Legal Basis
Name, Email, Password	Manage user Account, track orders, handle abuse	Contract, Legitimate Interest

3.2.4 ORDERS AND PAYMENTS.

Data	Purpose	Legal Basis		
Name, Address, Contact Info,	Order delivery, billing, fraud	Contract, Legitimate Interest,		
Payment Method, IP Address	prevention	Legal Obligation		

3.2.5 AUCTIONS.

Data	Purpose	Legal Basis
Bidder nickname	Enable bidding functionality; transparency during auction	Contract, Legitimate Interest
Account/order info linked to auction	Prevent abuse, manage disputes, process auction outcomes	Legitimate Interest

3.2.6 WISH LISTS. When you create your own Wish List in our Webshop and add products to your Wish List while logged out they will remain on the list for 30 days. If you add products to your Wish List while logged in you can always find them under Wish List in My Account.

Data	Purpose	Legal Basis	
Wishlist items	Remember saved preferences, show relevant offers	Legitimate Interest, Consent	
IP address, browsing behaviour	Associate items with session, improve experience	Consent (cookies), Legitimate Interest (logged-in personalization)	

3.2.7 REVIEWS. vidaXL enables customers to review products and services after placing an order. These reviews help us improve our services and inform other customers. Additionally, we may invite you to participate in customer satisfaction surveys. The data collected varies based on the type of review or survey and who is managing the Interaction (vidaXL or a Third Party).

3.2.7.1 PRODUCT AND SERVICE REVIEW MANAGED BY VIDAXL.

Data	Purpose	Legal Basis
Name, email address, product purchased, order number, residence (for service reviews)	Display with review, enable contact in case of complaints, link review to order, allow follow-ups on complaints, associate review with specific items, verify reviewer is a customer, understand customer region for context	Legitimate Interest, Consent

3.2.7.2 REVIEWS SUBMITTED VIA THIRD-PARTY PLATFORMS. When clicking "Write a review" or similar links on our Webshop, you may be redirected to a third-party review platform (one of vidaXL's contracted partners). These parties collect and process your data under their own privacy policies. vidaXL does not control how they handle your information.

Data	Purpose	Legal Basis
Name, email address	Display on third-party site,	Consent (via Third Party)
Name, emait address	customer verification	Consent (via miliu Farty)

Note: we invite you to consult the Third Party's privacy policy before submitting a review.

3.2.7.3 COMPARISON SITES WITH REVIEW FUNCTIONALITY. You may also review vidaXL through independent comparison sites showing our product listings.

Data	Purpose	Legal Basis	
Name, email address	Contact in case of complaints,	Consent, Legitimate interest	
	display on platform		

3.2.7.4 CUSTOMER SATISFACTION SURVEYS. After you purchase or interact with our customer service, you may be invited to complete a customer satisfaction survey. These surveys are conducted by Third Party service providers on behalf of vidaXL.

Data	Purpose	Legal Basis
Name, email address and/or phone number, experience details, order information, IP- address, feedback text	Contact for feedback, validate input, distribute survey, follow-up if needed, improve services and training, link experience to specific transaction, prevent multiple entries form the same user, evaluate quality service	Consent, Legitimate interest

3.2.8 CUSTOMER SERVICE INTERACTIONS. You may contact vidaXL's customer service to ask questions, request support, or file complaints. Contact options include phone, email, chat, or the online complaints form available on our Webshop. We collect and process Personal data to respond to and manage your request.

3.2.8.1 CUSTOMER SERVICE INTERACTIONS.

Data	Purpose	Legal Basis
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First and last name, email address, phone number, order number (operational/if applicable), description of the issue/question	Identify the customer and personalize service, respond to inquiries and send updates, contact for real-time or follow-up support, identify purchase for compliant handling, understand	Legitimate Interest, Contract Performance
	and resolve your requests	
Chat-specific: first and last	Live assistance	Legitimate Interest, Contract
name, email, chat subject	Live assistance	Performance

Where Processing is required to comply with applicable consumer protection or tax laws, the legal basis may also be a legal obligation.

3.2.8.2 RECORDING OF INTERACTIONS. Phone conversations with customer service may be recorded for the following purposes:

Data	Purpose		Legal Basis	i	
	Staff train	ing, service	Legitimate	Interest,	Consent
Voice recording of the call	improvement,	complaint	(with notice		
	validation		(with hotice	at Call Star	L)

Note: you will always be informed when a call is being recorded. Recordings are secured and retained only as long as necessary for the stated purpose and not more than 28 days.

3.2.9 NEWSLETTER.

Data	Purpose Legal Basis		
Name, Email, Preferences	Send general and personalized	Consent (opt-in), Legitimate	
Name, Email, Freierences	marketing communications Interest (existing custor		

4. Who we share your data with

- 4.1 vidaXL shares your Personal data with various third parties for the purposes of fulfilling your orders, providing services, maintaining our operations and complying with legal obligations. These Recipients can be categorized as Independent or Joint Controllers or Processors under GDPR.
- 4.2 Independent or Joint Controllers. These entities determine, independently or jointly with vidaXL, the purposes and means of Processing Personal data:

Entity	Purpose	Legal Basis	
Customer Service Providers	Handling customer inquiries and	Contract Performance,	
(vidaXL related entity)	complaints	Legitimate Interest	
Payment Service Providers	Secure payment processing	Contract Performance, Legal	
(PSPs) (e.g., PayPal, Klarna, Visa,		Obligation	
Adyen)			
Logistics Companies	Delivery and return of orders	Contract Performance	
Marketing & Survey Providers	Newsletter delivery, customer	Consent, Legitimate Interest	
	feedback		
Product Development / Quality	Analyse anonymized feedback	Legitimate Interest	
Teams	for improvements		

Note: this list may not be exhaustive.

4.3 Processors. These entities process Personal data strictly on vidaXL's instructions under article 28 GDPR:

Processor Type	Purpose

Cloud Hosting & IT Infrastructure	Website and systems operation
CRM & Customer Service Systems	Customer Interaction and support tracking
Email/Newsletter Platforms	Newsletter delivery and opt-in handling
Chat and Interaction Tools	Real-time customer support
Debt collection services	Subcontracting debt collection
Customer Service Providers (external)	Handling customer complaints on behalf of vidaXL

Note: this list may not be exhaustive.

- 4.4 Subprocessors. Where vidaXL's processors rely on subprocessors, the following measures are in place:
 - There is a binding agreement with the subprocessor;
 - The obligations mirror or exceed those in our Data Processing Agreements;
 - Subprocessors are vetted for adequate safeguards.
- 4.5 Other specific external recipients. vidaXL may share Personal data with the following parties:

Category	Examples	Purpose	Legal Basis
Public Bodies	Tax Authority, Financial	Legal compliance,	Legal Obligation
	Conduct Authority,	fraud prevention	
	Police, Customs		
Financial & Fraud	Anti-fraud, debt	Risk management	Legitimate Interest
Control Partners	recovery agencies		
Marketing Partners	Print/mail services,	Marketing & content	Consent, Legitimate
	email marketing	customization	Interest
External counsels	Law firms, accountants	Litigation, compliance	Legitimate Interest

4.6 Restructuring or corporate changes. In the event of a sale, merger, or restructuring of vidaXL or its affiliates, your Personal data may be shared with prospective buyers or group entities under strict confidentiality and only as permitted under GDPR.

5. Your rights

- 5.1 Under data protection legislation, you have rights including:
 - Your right of access You have the right to ask us for a copy of your personal information.
 - Your right to rectification You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
 - Your right to erasure You have the right to ask us to erase your personal information in certain circumstances.
 - Your right to restriction of Processing You have the right to ask us to restrict the Processing of your personal information in certain circumstances.'
 - Your right to object to Processing (only when based on Consent) You have the right to object to vidaXL Processing under certain circumstances.
 - Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organization, or to you, in certain circumstances.

Please note that these rights are not absolute. For example, if you request erasure of your Personal data, we may still need to retain certain details to comply with legal obligations (e.g. tax regulations).

5.2 How to exercise your rights. You can exercise your rights in the following ways:

By post: vidaXL

Mary Kingsleystraat 1 5928 SK Venlo The Netherlands (Please include your full name, postal address, email address, and—if available—your customer reference number to help us locate your data.)

By email webservice@vidaxl.ie

By phone 081 888 2209

5.3 Consequences of exercising a right under the GPDR. You are not required to pay any fare for exercising your rights. If you make a request, we have one month to respond to you. If you try to exercise your rights and we do not reply or you do not think our response is satisfactory, you can complain to the relevant Data Protection Authority referred to under Section 10 of this Policy.

6. International Transfers

6.1 vidaXL operates within an international corporate network of affiliated and contractually linked companies (referred to as the "vidaXL consortium"). While some companies are part of the same legal group, others operate under the vidaXL brand through close commercial and operation collaboration. These companies are located both within and outside the European Economic Area.

6.2 Access within the vidaXL consortium. Personal data may be transferred by vidaXL entities, affiliates, third parties located in the following countries depending on operational requirements:

- the EEA (the Netherlands, Romania, Poland, etc.)
- Australia
- The United States
- Asia (India, China, etc.)

Each of these entities only accesses Personal data as required to perform their contractual role (logistics, customer service, IT supports, etc.).

6.3 Transfers to non-EEA countries. Where Personal data is processed outside the EEA – whether by vidaXL entities, contractors, or third-party service providers – we ensure that such transfers are protected by adequate safeguards under GDPR. These include:

- Standard Contractual Clauses (SCCs) approved by the European Commission;
- Contractual data protection agreements;
- Technical and organizational safeguards;
- Supplier audits and assessments.

Some external Processors or service providers located in non-EEA countries (e.g. Google, Meta, Amazon, Web Services, etc.) may process Personal data under these safeguards.

7. HOW LONG WILL MY DATA BE KEPT?

7.1 vidaXL does not retain your Personal data longer than necessary for the purposes for which it was collected, unless a longer retention period is required or permitted by law (e.g. for tax, accounting, regulatory or legal claims). The retention period depends on the nature of the data and Processing purposes and may vary accordingly.

7.2 To ensure compliance with article 5(1)(e) GDPR, which requires Personal data to be kept no longer than is necessary, we apply the following general criteria and statutory obligations when determining data retention durations in Ireland:

Type of data	Purpose	Retention Period	Legal
			Basis/Justification

Order and transaction data Customer Service Interactions	Fulfilling contracts, customer service, accounting Complaint resolution, service quality	Up to 10 years Up to 2-5 years (depending on issue)	Revenue requirement (e.g. Irish tax law and Regulation (EU) 282/2011), accounting obligations Legitimate interest in defending claims,
	monitoring	,	training and service improvement
Review and Survey responses	Displaying reviews, service feedback	Up to 2 years	Consent, legitimate interest for internal quality improvement
Email Communications (e.g. newsletters)	Marketing, service updates	Until withdrawal of Consent	Consent under ePrivacy Directive and GDPR
Inactive Account Data	Fraud prevention, legal protection	Typically deleted after 2 years inactivity	Legitimate interest in preventing abuse; limitation period for civil claims
Chat Transcripts	Customer service reference	Up to 2-5 years (depending on issue)	Legitimate interest in improving customer experience
Customer contact info, purchase history, product serials, delivery records	Consumer warranties	As long as required by regulators	Sale of Goods and Supply of Services Act 1980 (Ireland) — liability may extend during and after warranty
Same as above, plus complaint handling records, support communications	Product Liability Claims	As long as required by regulators	Directive 85/374/EEC on product liability (transposed into national law); Statute of Limitations
Customer and product information necessary to identify affected users and perform notification	Product Recalls / Safety Notices	As long as required by regulators	General Product Safety Directive (2001/95/EC)
Customer Interaction data relevant to claims	Legal Claims	Up to the applicable status of limitation as provided in law	Statute of Limitations Act 1957 — civil claims generally expire after 6 years

7.3 Archiving and deletion. Once the applicable retention period expires, your Personal data will either be securely deleted, anonymised or archived in a way that it is no longer accessible or identifiable unless further retention is legally required.

8. What security measures are taken to protect my data?

8.1 General principles. vidaXL takes appropriate technical and organizational measures to protect your Personal data against unauthorized or unlawful Processing and against accidental loss, destruction or damage. These measures are proportionate to the sensitivity of the data, the scope of our activities, the volume of data processed, and the potential risks involved. We apply the principles of data protection by design and by default as required by article 25 of the GDPR.

8.2 Examples of security measures implemented. To safeguard your data, vidaXL employs the following categories of measures:

Category	Examples of Measures		
Technical Security	SSL/TLS encryption for data in transit		
Organizational security	Employee confidentiality agreements;		
	 Mandatory data protection training; 		
	 Limited access to data based on job roles; 		
	Vendor risk assessments for third parties		
Monitoring and Response • Continuous system monitoring for unusual access attem			
	 Regular audits and penetration testing; 		
	Incident response plan in case of data breach		
Data minimization and	Personal data is only retained as long as necessary		
retention	• Pseudonymisation/anonymization used where full identification is		
	not required		

8.3 Your responsibility. We also expect you to take steps to protect your Personal data by, for instance, always keeping your login credentials confidential, using a strong password and avoid using the same password for multiple accounts, log out when using public or shared devices, immediately notify vidaXL or any suspected misuse of your Account.

9. COOKIES, TAGS & TRACKERS

- 9.1 What are cookies, tags and trackers? Cookies are small text files stored on your device (e.g. computer, smartphone, or tablet). When you visit a website. Similar technologies such as tags, trackers, and web beacons may also be used (collectively referred to as "Cookies"). These tools help us, and our partners, understand how you interact with our Webshop and services.
- 9.2 Why do we use cookies? Cookies can be used to:
 - Enable Webshop functionality (e.g. shopping cart, login);
 - Improve performance and user experience;
 - Conduct analytics and A/B testing
 - Show personalized ads and product recommendations;
 - Track marketing effectiveness across platforms;
 - Enable social media and affiliate integrations.

9.3 Cookies used on this website

Cookie Type	Purpose	Services/Tools Used	Personal Data	Can Be
			Collected	Refused?
Strictly	Essential for site	First-party cookies,	No Personal	No
Necessary	functionality	Creativecdn.com, mdgid.com	data	
Cookies	(e.g. privacy settings, logging in, forms). Blocking may affect site operation.			
Functional	Enable	weird_get_top_level_domain,	Possibly	Yes
Cookies	enhanced	_sp_id.xxxx, flowbox, _cq_dnt,	anonymous	
	features &	zoovu, swogoTestCookie	usage data	
	personalization.			

Performance Cookies	Some services may not work without them. Analyse visits and traffic for site improvement. Data is aggregated and anonymous.	Stactic, Hotjar, us.ck, Google Analytics, Pingdom, Google Tag Manager, TVSquared, ContentSquare, Speedcurve, Zendesk, Zoovu, Clarity	No PII (aggregated usage data only)	Yes
Targeting Cookies	Used by advertising partners to show relevant ads based on browsing profile.	ih.adsclare.de, cquotient.com, youtube.com, skroutz.gr, tpmn.co.kr, adnxs.com, casalemedia.com, media.net, bh.contextweb.com, adscale.de, 1rx.io, yahoo.com, bing.com, krxed.net, echange.mediavine.com, udmserv.net, demdex.net, criteo.com, bidswitch.net, pubmatic.com, 360yield.com, adtarget.com.tr, yieldlab.net, unrulymedia.com, termorhub.com	Pseudonymous profile data (no direct PII)	Yes
Affiliate Cookies	Track referral and sale attribution from partners.	Google Ads, Bing Ads, Criteo, IntelliAd	No PII	Yes

Note: the specific details for each cookie category and each cookie can be found on the cookie banner on the Webshop.

Learn more about how Google processes personal information on Google's Business Data Responsibility page <u>Business Data Responsibility</u>.

9.4 Accepting and Declining Cookies

9.4.1 When you visit vidaXL.ie, a cookie banner will appear at the bottom of the Webshop. You have the following options:

- Accept all cookies: this includes essential, analytical and marketing cookies.
- Personalize settings:
 - $\circ\quad$ you can opt in to analytical and marketing cookies.
 - o If you do not opt in and click "save settings" only essential cookies will be used.
- Refuse all cookies: only strictly necessary cookies will be used.

9.4.2 Other cookie management options. You may also can control cookie usage by adjusting settings in your browser. Because each browser is different, vidaXL recommends referring to your browser's help section or device manual for instructions. You can delete cookies manually from your computer, tablet or phone's hard drive. Refer to your browser or device guide for instructions. If cookies are fully disabled, some functionality of the vidaXL Webshop may no longer work properly.

10. How to make a claim

10.1 Data Protection Officer (DPO). vidaXL has appointed a DPO in accordance with Article 37 of the GDPR. The DPO is responsible for:

• Monitoring compliance with the GDPR and other applicable data protection laws;

- Advising the company and its employees on data protection obligations;
- Serving as a contact point for Data Subjects and the Supervisory Authority;
- Conducting risk assessments and advising on data protection impact assessments;
- Ensuring Data Subject rights are upheld properly and timely.

10.2 How can I contact the Data Protection Officer?

10.2.1 If you have any questions or concerns about how your Personal data is handled, or if you wish to exercise your data protection rights, you may contact the DPO directly.

You can contact our DPO at:

• Email: webservice@vidaxl.ie

Mail:

Attn: Data Protection Officer

vidaXL

Mary Kingsleystraat 1

5829 SK Venlo

The Netherlands

10.2.2 If you're not satisfied with how we've handled your concern, or if you believe we are not Processing your Personal data lawfully, you have the right to lodge a complaint with the relevant data protection authority.

Lead Supevisory Auhtority	Supervisory Authority in Ireland:
Autoriteit Persoonsgegevens	Data Protection Commission
Bezuidenhoutseweg 30, 2594 AV The Hague,	21 Fitzwilliam Square South, Dublin 2, D02 RD28
Netherlands	Ireland
https://autoriteitpersoonsgegevens.nl	www.dataprotection.ie

11. Changes to this Notice

The contents of this Privacy Policy and Cookie Statement can be amended. The most current version can always be found on the vidaXL Webshop. vidaXL advises that you regularly check this Privacy Policy and Cookie Statement, at least before you provide vidaXL with Personal data.