

Your privacy is important to us at Pinkomo 'cause also by that we can provide better service for you. That's why we've created this privacy policy to explain Pinkomo's information collection and use practices in connection with the site. You're bound to the Privacy Policy, too: it's part of the Agreement, and by using our service you agree that you have read it, that you understand it, and that you will comply with it.

About GDPR in General

GDPR stands for General Data Protection Regulation and is a new data protection regulation from the EU that will become law in all EU Member States on 25 May 2018. The GDPR will replace the current Personal Data Act (PDA). The Act is intended to protect individuals' privacy and to modernise, harmonise and reinforce protection within the EU.

Each EU Member State has a supervisory authority that will monitor this.

Who we are

Pinkomo is a clothing webstore curated and run by Mikko Sorvala and owned by Pinkomo Oy. Our website address is: <https://www.pinkomo.fi>. For any issues concerning your privacy, contact: info@pinkomo.fi

Personal Data Controller

The Personal Data Controller (PDC) is the party that under the law has the ultimate responsibility for data processing and decides the purpose and the means of this. The Personal Data Controller must ensure compliance with the law, must inform those persons whose personal data is being processed and must ensure regulatory compliance by the Personal Data Processor. We are the Personal Data Controller for all processing of personal data about you as a customer or user when you use Pinkomo's services or, for example, contact us. What we do, or do not do, with your personal data is described here in our Privacy Policy.

What Personal Data We Collect And Why We Collect It

We don't collect any Personal Data from Visitors or Users when they use the Service, unless they provide such information voluntarily, for example, by ordering products from us.

When you order from our website, your personal order form data will be stored into our

(Pinkomo) database records. It will be stored there indefinitely but you have the right to ask it to be removed and we will do so. When you visit our site, we have Google Analytics tool and Jetpack Analytics in use, which both monitor your ip-address and, for example, where do you visit from and for how long do you visit our site. After you leave our site, no records of where you go next are not stored or known by us. We have these analytics tools in use to be able to provide better service for you, our customers.

The Information We Store When You Order

When you order from us, the following data is stored in our database to secure that the item/items you ordered really go to you or to the recipient you tell us to send it.

Your full name, Company name (not obligatory but if you type it in, it will be also stored in our records), Street Address and Country, Postcode, Town, E-mail address, Phone Number and possible personalised order notes you want to leave for us in the extra order comment section. If you want us to ship your order to another address than to your billing address, then we also store the extra shipping information on our records too. This includes the same information fields as above: Recipients full name, Company name (not obligatory but if you type it in, it will be also stored in our records), Street Address and Country, Postcode, Town, Phone Number and E-mail address.

Also, the information of the item/items you order will be stored in our database indefinitely. This means: the item name, size, color, brand name, price. If you are a frequent customer, your whole order history is stored in our database in order for us to be able to offer better service and products for you. Also, the automatically calculated shipping price for your location will be stored in our records. We also need to store some of the information of the sold products for legal reasons, for example, the Finnish Bookkeeping Act.

About Your Payment Information

We do not store or have the access to your payment information, such as your credit card number etc. For the payment options, we have Checkout.fi and Klarna in use which are run on their respected and secure third party servers. When you order from us, you will be securely redirected to their respected services and services, according to what payment option you select to use when you decide to order from us. When using Klarna or Checkout, you acknowledge that the information you provide will be transferred to them for processing in accordance with their Privacy Policy and Terms. Their terms of use can be seen on their sites.

When you have completed your purchase on either one of those services, you will be securely redirected back to our site. We do not have any access to your personal payment information. We only know, if and when your payment is completed in order for us to be able to ship you the item/items you ordered from us. The same applies to the refund process.

Klarna Checkout for WooCommerce

When you place an order in the webstore with Klarna Checkout as the chosen payment method, information about the products in the order (name, price, quantity, SKU) is sent to Klarna. When the purchase is finalized Klarna sends your billing and shipping address back to the webstore. This data plus an unique identifier for the purchase is then stored as billing and shipping data in the order in WooCommerce.

Access to Personal Data

Only those at Pinkomo who need access to the Personal Data to perform their work tasks are processing the Personal Data. Those people have entered into confidentiality agreements.

Subscriptions To E-mail List

When you have subscribed to our e-mail list you have agreed to receive information from us about our shop updates, such as product offers and more. At any time, you can remove yourself from the e-mail list and your e-mail information will be removed from our servers.

Marketing Permissions

Pinkomo will use the information you provide by joining our e-mail list in the e-mail subscription form to be in touch with you and to provide updates and marketing.

You can change your mind at any time by clicking the unsubscribe link in the footer of any email you receive from us, or by contacting us at info@www.pinkomo.fi. We will treat your information with respect. By joining our e-mail list, you agree that we may process your information in accordance with these terms.

[Mailchimp GDPR](#)

We use MailChimp as our marketing automation platform. By joining our e-mail list, you acknowledge that the information you provide will be transferred to MailChimp for processing in accordance with their [Privacy Policy](#) and [Terms](#).

Personal Data Processor

In certain cases personal data will be processed by external parties acting as the Personal Data Processor for Pinkomo. The Personal Data Processor (PDP) will process personal data on behalf of Pinkomo and will be responsible for the technical and organisational security measures.

How Long We Retain Your Data

For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information. We retain that data indefinitely.

What Rights You Have Over Your Data

- **Right to access your data**
- You can request to receive an extract containing the data that we have about you. The extract will be sent free of charge in one copy on one occasion per year.
- **Right of rectification.**
- You have the right to have rectified any wrong or incomplete information about yourself.
- **Right to be forgotten**
- You have the right to request the removal of your personal data when the purpose of the processing is no longer current. The removal cannot be revoked/recreated and once the removal is complete, no person can be associated with the user account any longer. However, there may be legal obligations for Pinkomo Oy as the Institution which prevents the immediate deletion of your personal data or parts of it. These obligations stem from accounting and tax legislation, but also from consumer rights legislation. In such a case, only the personal data that we are required to save in order to fulfill such legal obligations will be saved.

If you have an account on this site, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes. Also, if you want to request us to collect your personal data in an exported file more than in one copy per year, we will apply an extra fee minimum of 100€ per data collection request.

Right to Access Personal Data

You have the right to obtain from Pinkomo confirmation as to whether or not Personal Data concerning you are being processed, and, where that is the case, access to the Personal Data.

You have the right to obtain from Pinkomo the erasure of Personal Data concerning you and Pinkomo has the obligation to erase Personal Data when the Personal Data is no longer necessary in relation to the purposes for which they were collected or otherwise processed or you have withdrawn consent on which the processing is based.

Restriction of Processing

You have the right to obtain from Pinkomo restriction of processing if you have a particular reason for wanting the restriction. This may be if you have issues with the content of the information we hold or how we have processed your personal data. It can also be the case when Pinkomo no longer needs the Personal Data.

Who We Collaborate With To Be Able To Provide Our Services For You

We use MailChimp as our marketing automation platform. By joining our e-mail list, you acknowledge that the information you provide will be transferred to MailChimp for processing in accordance with their [Privacy Policy](#) and [Terms](#). [Mailchimp GDPR](#).

For the payment processes we use Checkout.fi and Klarna.

Our site webhotel is provided by Neutech.

Our site has been built by Juxtalab Creative Solutions (juxtalab.com), and they have admin privileges of this site in order to provide scheduled maintenance updates to keep this site

running smoothly. They have agreed into confidentiality agreements and only approved staff have access to the platform.

WordPress does not share any personal data with anyone.

About our site

Our site is build on top of WordPress and the webstore platform we have in use is Woocommerce, read their [terms here](#). Our website has been designed by [Juxtalab Creative Solutions](#).

Below you can read more about the tools we have in use on our site.

WooCommerce

We collect information about you during the checkout process on our store.

What we collect and store

While you visit our site, we'll track:

- Products you've viewed: we'll use this to, for example, show you products you've recently viewed
- Location, IP address and browser type: we'll use this for purposes like estimating taxes and shipping
- Shipping address: we'll ask you to enter this so we can, for instance, estimate shipping before you place an order, and send you the order!

We'll also use cookies to keep track of cart contents while you're browsing our site.

When you purchase from us, we'll ask you to provide information including your name, billing address, shipping address, email address, phone number, credit card/payment details and optional account information like username and password. We'll use this information for purposes, such as, to:

- Send you information about your account and order

- Respond to your requests, including refunds and complaints
- Process payments and prevent fraud
- Set up your account for our store
- Comply with any legal obligations we have, such as calculating taxes
- Improve our store offerings
- Send you marketing messages, if you choose to receive them

If you create an account, we will store your name, address, email and phone number, which will be used to populate the checkout for future orders.

Jetpack Plugin Personal Data Information

Jetpack is a plugin built by [Automattic](#).

Activity Log

This feature only records activities of a site's registered users, and the retention duration of activity data will depend on the site's plan and activity type.

Data Used: To deliver this functionality and record activities around site management, the following information is captured: user email address, user role, user login, user display name, WordPress.com and local user IDs, the activity to be recorded, the WordPress.com-connected site ID of the site on which the activity takes place, the site's Jetpack version, and the timestamp of the activity. Some activities may also include the actor's IP address (login attempts, for example) and user agent.

Activity Tracked: Login attempts/actions, post and page update and publish actions, comment/pingback submission and management actions, plugin and theme management actions, widget updates, user management actions, and the modification of other various site settings and options. Retention duration of activity data depends on the site's plan and activity type. See the complete list of currently-recorded activities (along with retention information).

Data Synced (?): Successful and failed login attempts, which will include the actor's IP address and user agent.

Notifications

This feature is only accessible to registered users of the site who are logged in to WordPress.com.

Data Used: IP address, WordPress.com user ID, WordPress.com username, WordPress.com-connected site ID and URL, Jetpack version, user agent, visiting URL, referring URL, timestamp of event, browser language, country code. Some visitor-related information or activity may be sent to the site owner via this feature. This may include: email address, WordPress.com username, site URL, email address, comment content, follow actions, etc.

Activity Tracked: Sending notifications (i.e. when we send a notification to a particular user), opening notifications (i.e. when a user opens a notification that they receive), performing an action from within the notification panel (e.g. liking a comment or marking a comment as spam), and clicking on any link from within the notification panel/interface.

Protect

Data Used: In order to check login activity and potentially block fraudulent attempts, the following information is used: attempting user's IP address, attempting user's email address/username (i.e. according to the value they were attempting to use during the login process), and all IP-related HTTP headers attached to the attempting user.

Activity Tracked: Failed login attempts (these include IP address and user agent). We also set a cookie (jpp_math_pass) for 1 day to remember if/when a user has successfully completed a math captcha to prove that they're a real human. [Learn more about this cookie.](#)

Data Synced (?): Failed login attempts, which contain the user's IP address, attempted username or email address, and user agent information.

Data Used: To initiate and process subscriptions, the following information is used: subscriber's email address and the ID of the post or comment (depending on the specific subscription being processed). In the event of a new subscription being initiated, we also collect some basic server data, including all of the subscribing user's HTTP request headers, the IP address from which the subscribing user is viewing the page, and the URI which was given in order to access the page (REQUEST_URI and DOCUMENT_URI). This server data used for the exclusive purpose of monitoring and preventing abuse and spam.

Activity Tracked: Functionality cookies are set for a duration of 347 days to remember a visitor's blog and post subscription choices if, in fact, they have an active subscription.

WordPress.com Secure Sign On

This feature is only accessible to registered users of the site with WordPress.com accounts.

Data Used: User ID (local site and WordPress.com), role (e.g. administrator), email address, username and display name. Additionally, for activity tracking (see below): IP address, WordPress.com user ID, WordPress.com username, WordPress.com-connected site ID and URL, Jetpack version, user agent, visiting URL, referring URL, timestamp of event, browser language, country code.

Activity Tracked: The following usage events are recorded: starting the login process, completing the login process, failing the login process, successfully being redirected after login, and failing to be redirected after login. Several functionality cookies are also set, and these are detailed explicitly in our Cookie documentation.

Data Synced (?): The user ID and role of any user who successfully signed in via this feature.

WordPress.com Stats

Data Used: IP address, WordPress.com user ID (if logged in), WordPress.com username (if logged in), user agent, visiting URL, referring URL, timestamp of event, browser language, country code. Important: The site owner does not have access to any of this information via this feature. For example, a site owner can see that a specific post has 285 views, but he/she cannot see which specific users/accounts viewed that post. Stats logs — containing visitor IP addresses and WordPress.com usernames (if available) — are retained by Automattic for 28 days and are used for the sole purpose of powering this feature.

Activity Tracked: Post and page views, video plays (if videos are hosted by WordPress.com), outbound link clicks, referring URLs and search engine terms, and country. When this module is enabled, Jetpack also tracks performance on each page load that includes the Javascript file used for tracking stats. This is exclusively for aggregate performance tracking across Jetpack sites in order to make sure that our plugin and code is not causing performance issues. This includes the tracking of page load times and resource loading duration (image files, Javascript files, CSS files, etc.). The site owner has the ability to force this feature to honor DNT settings of visitors. By default, DNT is currently not honored.

WordPress.com Toolbar

This feature is only accessible to registered users of the site who are also logged in to WordPress.com.

Data Used: Gravatar image URL of the logged-in user in order to display it in the toolbar and the WordPress.com user ID of the logged-in user. Additionally, for activity tracking (detailed below): IP address, WordPress.com user ID, WordPress.com username, WordPress.com-connected site ID and URL, Jetpack version, user agent, visiting URL, referring URL, timestamp of event, browser language, country code.

Activity Tracked: Click actions within the toolbar.

Cookies

Analysis cookies collect anonymous information on how our services are used, e.g. which pages are popular, if you receive an error message anywhere or which kind of device is used. For example, third party cookies for Google Analytics and Google Tag Manager.

If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select “Remember Me”, your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

How you can control our use of Cookies

Go to your browser or device settings to learn more about how to adjust the settings for cookies. For example, you can choose to block all cookies, accept only first party cookies or delete cookies when you close your web browser.

Note that some of our services may not work if you block or delete cookies.

Google Web Fonts

For uniform representation of fonts, this page uses web fonts provided by Google. When you open a page, your browser loads the required web fonts into your browser cache to display texts and fonts correctly.

For this purpose your browser has to establish a direct connection to Google servers. Google thus becomes aware that our web page was accessed via your IP address. The use of Google Web fonts is done in the interest of a uniform and attractive presentation of our

plugin. This constitutes a justified interest pursuant to Art. 6 (1) (f) DSGVO.

If your browser does not support web fonts, a standard font is used by your computer.

Further information about handling user data, can be found at <https://developers.google.com/fonts/faq> and in Google's privacy policy at <https://www.google.com/policies/privacy/>.

Analytics

For tracking website visits, we use Google Analytics and Google Tag Manager, as well as Jetpack Analytics tool. Google Analytics tracking data is stored for 26 months. Read more about how Google Analytics analyze your data and see their privacy policies [here](#) and [here](#).

Additional information

How we protect your data

We make sure to protect your data the best we can and your data is stored only in highly protected places. We have many different data protection procedures in place, such as:

- Only approved staff have access to the platform
- Backups are done at predetermined intervals.
- Ensuring about the latest updates, for example, for the cms, the store platform and plugins
- Protecting personal data by employing techniques such as access restrictions, encryption, pseudonymization, backups, data minimization, and regular testing of all these techniques.

In which countries will processing of your personal data occur?

Your personal data will be processed within the EU/EEA.

What data breach procedures we have in place

We have multiple data breach procedures in place, such as:

- Notifying the appropriate supervisory authority no more than 72 hours after of becoming aware of a breach of users' personal data, including the number of users

whose data was exposed, the nature of the breach, and what actions are being taken to mitigate its effects.

- Communicating this information to the impacted users, especially if the data breach exposed any of their unencrypted personal data.
- Considering the needs of any law enforcement investigations before publicly announcing the breach.

Additional Notes and Contact

If you have any extra questions, please contact us at: info@www.pinkomo.fi