

## PRIVACY POLICY

### 1 HAPPYDRESS PROTECTS YOUR PERSONAL PRIVACY

We want you to feel safe when you provide your personal data to Happydress OY ("**Happydress**" or "**the Company**"). Your personal privacy, the protection of your personal data, and your continued trust in us is important to us, which is why Happydress in this Privacy Policy wants to demonstrate how it ensures that your personal data is processed in compliance with applicable legislation.

This Privacy Policy informs you about how Happydress processes and uses your personal data as a customer, potential customer, and job applicant, or as a representative of a company that is a customer, potential customer, or a Happydress business partner. This Privacy Policy further outlines your rights and how you can exercise your rights vis-à-vis Happydress.

Please feel free to contact us regarding any questions relating to the Happydress Privacy Policy by sending us an e-mail to our customer service at [asiakaspalvelu@houseoflola.fi](mailto:asiakaspalvelu@houseoflola.fi).

### 2 PERSONAL DATA CONTROLLER

Happydress OY, FO 2613217-5, c/o Happydress AB, Kungsgatan 111, 753 18 Uppsala, Sweden, is the Personal Data Controller for the processing of your personal data and is thus responsible to ensure your data is processed in a correct and safe way and in compliance with applicable legislation. Contact information for Happydress can be found below in the "Contact" section.

### 3 WHAT PERSONAL DATA ARE PROCESSED BY HAPPYDRESS?

Personal data means any information and all data that directly or indirectly identifies a natural living person. It is data about you as an individual. Examples of personal data are name, contact details, images, IP address and sizes.

Processing means any operation which is performed on personal data, such as collection, storage, use, processing and disclosure of personal data.

#### **Customers:**

The Company collects and stores data about you to be able to contact you and to fulfil its obligations vis-à-vis you as a customer, such as name according to the Swedish Population Register, social security number, mailing address, e-mail address, phone number, size (such as clothing and shoe sizes) and purchasing history.

#### **Potential customers:**

Happydress' sales consultants have an extensive network of contacts and arrange gatherings for the purpose of marketing Happydress' products. The Company may collect and store data about you as a potential customer with Happydress if you at any time have shown an interest in Happydress products. Collected data may be name, address, e-mail address and size (such as clothing and shoe sizes)

#### **Company representatives:**

The Company collects and stores data about you to be able to contact you in your capacity as a company representative, such as name, job title, e-mail address, phone number.

### Visitors to the website:

The Company collects data about you to be able to improve, streamline, simplify and develop our website, such as IP address, MAC address, cookie information and similar (device information).

### Recruitment (work applicants):

The Company collects data about you to be able to recruit the right person to positions within the Company. Personal data collected for recruitment purposes are name, mailing address, e-mail address and phone number, CV and other personal data you choose to provide to us.

## 4 HAPPYDRESS' PROCESSING OF YOUR PERSONAL DATA

### 4.1 For existing customers

Happydress processes your personal data when you, as a customer, buy our products. Your personal data can be provided directly by you, or via one of our sales consultants whom you have been in contact with. Happydress may also obtain your personal data via the Happydress webstore, via pages relating to Happydress on social media, via phone at our customer support or from any of Happydress' business partners such as Klarna.

What data we collect concerning you, the purposes for which we process your personal data, and the legal basis we have for each processing is shown in the table below.

Personal data category	Happydress' purpose for the processing
<ul style="list-style-type: none"><li>• Name (from the Swedish Population Register)</li><li>• Social security number</li><li>• Address</li><li>• Phone number</li><li>• E-mail address</li><li>• Size</li><li>• Order number</li><li>• Purchase information (e.g. information about ordered products)</li></ul>	To manage your customer relationship with Happydress and keep in contact with you for the purpose of delivery of ordered products. Your social security number is processed for the purpose of proper identification only.
<b>Legal basis:</b> The processing is required to fulfil our agreement with you.	

<b>Personal data category</b>	<b>Happydress' purpose for the processing</b>
<ul style="list-style-type: none"> <li>• Name (from the Swedish Population Register)</li> <li>• Social security number</li> <li>• Address</li> <li>• Phone number</li> <li>• E-mail address</li> <li>• Your correspondence with Happydress</li> <li>• Purchase and payment history</li> </ul>	To comply with statutory requirements, such as accounting requirements, but also consumer protection legislation and product liability and product safety regulations.
<p><b>Legal basis:</b> The processing is required for Happydress to comply with legislative obligations.</p>	

<b>Personal data category</b>	<b>Happydress' purpose for the processing</b>
<ul style="list-style-type: none"> <li>• Name (from the Swedish Population Register)</li> <li>• Address</li> <li>• Phone number</li> <li>• E-mail address</li> </ul>	To enable marketing of, and communication about Happydress and our products. For example, mailing of marketing materials and recruitment ads to become a sales consultant for the Happydress brand, or mailings of invitations to activities such as releases of new collections, bookings of viewings or sales campaigns. Happydress also sends out newsletters to its customers.
<p><b>Legal basis:</b> The processing is required by Happydress' legitimate interest in marketing its brand, House of Lola, and marketing its products to you as a customer (balance of interests).</p>	

<b>Personal data category</b>	<b>Happydress' purpose for the processing</b>
<ul style="list-style-type: none"> <li>• Purchase and payment history</li> <li>• Site information</li> <li>• Place of residence</li> <li>• Specified customer choices in Happydress' communication channels</li> </ul>	To analyse purchase history and behaviours specific to certain geographical areas. This will allow Happydress to follow up on its sales consultants' sales activities, customer interactions and work, as well as the need for competence development.
<p><b>Legal basis:</b> The processing is required by Happydress legitimate interest in offering its customers relevant marketing with regards to the customers' previous purchases as well as following up on the sales consultants' work and also in offering them relevant competence development (balance of interest).</p>	

<b>Personal data category</b>	<b>Happydress' purpose for the processing</b>
<ul style="list-style-type: none"> <li>• Payment information</li> <li>• Bank details</li> <li>• Credit card details such as CVV code and expiry date</li> <li>• Card number</li> <li>• Creditworthiness</li> </ul>	To receive payments as well as processing of possible refunds from/to you for purchases/returns of Happydress products.
<p><b>Legal basis:</b> The processing is required to fulfil our agreement with you as a customer.</p>	

<b>Personal data category</b>	<b>Happydress' purpose for the processing</b>
<ul style="list-style-type: none"> <li>• Information about complaints</li> <li>• Information about exchanges</li> <li>• Information about returned products</li> <li>• Other customer service communications</li> </ul>	<p>To process exchanges and returns and to handle and compensate the customer in case of complaints.</p> <p>To offer the customer good customer service based on customers' shopping experiences etc.</p>
<p><b>Legal basis:</b> The processing is required to fulfil our agreement with you as a customer.</p> <p>The processing is required to fulfil Happydress' legal obligations according to consumer laws.</p> <p>The processing is required by Happydress' legitimate interest in offering its customers good customer service.</p>	

<b>Personal data category</b>	<b>Happydress' purpose for the processing</b>
<ul style="list-style-type: none"> <li>• Name</li> <li>• Social security number</li> <li>• Address</li> <li>• E-mail address</li> <li>• Size</li> <li>• Phone number</li> <li>• Data provided in competitions</li> <li>• Data provided in evaluations of events</li> </ul>	To be able to market, manage participations and conduct competitions and events and in relation thereto, identify winners. Further, to be able to announce winners and hand out prizes etc.

**Legal basis:** The processing is necessary to meet Happydress' and your legitimate interest in managing your participation in competitions and/or events.

#### 4.2 For potential customers

When you come into contact with Happydress through one of our sales consultants or via our webstore, by joining groups related to Happydress on social media, participate in Happydress sales events or otherwise come into contact with Happydress and are interested in our products, then we process your personal data in your capacity as a potential customer. Happydress can also obtain your personal data from Happydress' customer support, from pages related to Happydress on social media or from any of Happydress' customers or business partners.

What data we collect concerning you, the purposes for which we process your personal data, and the legal basis we have for each processing is shown in the table below.

Personal data category	Happydress' purpose for the processing
<ul style="list-style-type: none"> <li>• Name (from the Swedish Population Register)</li> <li>• Address</li> <li>• Phone number</li> <li>• E-mail address</li> </ul>	To enable marketing of and communication about Happydress and our products, including previously shown interest. For example, mailing of marketing materials, recruitment ads to become a sales consultant of the Happydress brand or mailing out of invitations to activities such as new collection releases or sales campaigns.
<p><b>Legal basis:</b> The processing is necessary for Happydress' legitimate interest to evaluate, develop and improve its brand, its products and its marketing.</p>	

Personal data category	Happydress' purpose for the processing
<ul style="list-style-type: none"> <li>• Name</li> <li>• Social security number</li> <li>• Address</li> <li>• E-mail address</li> <li>• Size</li> <li>• Phone number</li> <li>• Data provided in competitions</li> <li>• Data provided in evaluations of events</li> </ul>	To market, manage participations and conduct competitions and events and in relation thereto, identify winners. Further, to be able to announce winners and hand out prizes etc.
<p><b>Legal basis:</b> The processing is necessary to meet Happydress' and your legitimate interest in managing your participation in competitions and/or events.</p>	

Personal data category	Happydress' purpose for the processing
<ul style="list-style-type: none"> <li>Other customer services communications</li> </ul>	To offer potential customers good customer services.
<p><b>Legal basis:</b> The processing is necessary to meet Happydress' legitimate interest in offering its customers good customer service.</p>	

#### 4.3 For company representatives and business partners

Your personal data can be transferred to us directly from you or from the company you represent when they collaborate or do business with Happydress. The data we collect concerning you is obtained from open sources, such as the website of the company you represent. Happydress may also receive your personal data from Happydress' other customers or business partners.

What data we collect concerning you, the purposes for which we process your personal data, and the legal basis we have for each processing is shown in the table below.

Personal data category	Happydress' purpose for the processing
<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Phone number</li> <li>E-mail address</li> <li>Job title/position</li> <li>Workplace/company</li> </ul>	To keep in contact with a representative of the company in connection with the delivery of services e.g. at delivery of goods etc.
<p><b>Legal basis:</b> The processing is necessary to meet Happydress' legitimate interest in managing the relationship and cooperation with the company you represent (balance of interests).</p>	

#### 4.4 For job applicants at Happydress

Your personal data can be transferred to us directly from you or from the staffing, recruitment, or hiring companies through which you are seeking work.

We also process personal data for anyone who applies to become a Happydress sales consultant. Happydress obtains your personal data from you when you submit a registration of interest, fill in web forms on our website or when we receive tips about you from our existing sales consultants.

What data we collect concerning you, the purposes for which we process your personal data, and the legal basis we have for each processing is shown in the table below.

Personal data category	Purpose for the processing	Legal basis
<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Phone number</li> <li>• E-mail address</li> <li>• Job title</li> </ul>	To keep in contact and book any interviews with job applicants.	The processing is necessary to meet Happydress' legitimate interest in recruiting and employing personnel (balance of interests).
<ul style="list-style-type: none"> <li>• Gender</li> <li>• Information about competence and education in a CV or personal letter</li> <li>• Various types of educational reports</li> <li>• Various types of certificates</li> <li>• Letters of referral</li> <li>• Any of your personal data which you choose to provide to Happydress</li> </ul>	During a recruitment process, to be able to determine who is most suitable for a position and to ensure that the relevant person has the required competences.	The processing is necessary to meet Happydress' legitimate interest in recruiting and employing personnel and ensuring they have the right competences to work for Happydress (balance of interests).
<ul style="list-style-type: none"> <li>• Image or photo of the job applicant, if you as the applicant choose to include such in your application.</li> </ul>	To have an image impression of the person, for identification during any interviews etc.	The processing is necessary to meet Happydress' legitimate interest in recruiting and employing personnel, and further, to follow up the contact and get an understanding of who the person is prior to the recruitment interview etc. (balance of interests).
<p>All data only refer to sales consultants:</p> <ul style="list-style-type: none"> <li>• Family status</li> <li>• Current employment</li> <li>• Motivations for becoming/being a Happydress sales consultant</li> </ul>	Sales consultants become a part of the Happydress brand and are Happydress' representatives toward the customers. Happydress collects these personal data to gain an in-depth understanding of a potential sales consultant and to determine if the	The processing is necessary to meet Happydress' legitimate interest in recruiting sales consultants who portray the company's brand and values, and further to employ and assign work to sales consultants who have the required

<ul style="list-style-type: none"> <li>• Interests and spare time activities</li> <li>• Any of your personal data which you choose to provide to Happydress</li> </ul>	<p>applicant is suited, has the personality and the competences required to be a sales consultant for Happydress.</p>	<p>competence and desired personality to become/be a Happydress sales consultant (balance of interests).</p>
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#### 4.5 For visitors to the web page

What data we collect concerning you, the purposes for which we process your personal data, and the legal basis we have for each processing is shown in the table below.

Personal data category	Purpose for the processing	Legal basis
<ul style="list-style-type: none"> <li>• "Device information", such as IP address, MAC address, information from cookies and the like.</li> </ul>	<p>To develop our home page and customise it better based on how our website (www.houseoflola.fi) is used.</p>	<p>The processing is necessary to meet Happydress' legitimate interest in improving, streamlining and developing its website and for the purpose of attracting more customers/business partners (balance of interests).</p>

## 5 STORAGE TIME

Happydress will store your personal data no longer than is necessary for the purposes for which the personal data was collected, or for as long as Happydress is required to store your personal data by law or to guard Happydress' legal interests, such as if there is a legal proceeding ongoing. Thereafter your personal data will be deleted.

In order to comply with relevant accounting legislation, certain personal data will be stored for seven years, from the end of the calendar year in which the financial year, to which the personal data relate, ended.

Contact data for company representatives is stored during such time Happydress deems the data is necessary in order to maintain the relationship with the company/organisation. Deletion occurs when Happydress becomes aware the data is no longer adequate or relevant for the purpose or when the company representatives so request.

For more information about how long Happydress stores specific personal data, please contact Happydress via the contact details provided in section "Contact" below.

## 6 DISCLOSURE AND TRANSFER OF PERSONAL DATA TO THIRD PARTY AND THIRD COUNTRY

Happydress does not disclose personal data to third parties except in situations where this is a legislative obligation, or to fulfil Happydress' obligations to you. Happydress discloses your personal data with personal data processors, which are companies that process the data on our behalf and according to our instructions. Some personal data processors are independent personal data controllers and, in such cases, Happydress



cannot control how the submitted personal data will be processed. Your personal data will not be transferred or sold to third parties for advertising or marketing purposes. The following table highlights situations where your personal data may be disclosed to third parties.

<b>Third party / External actors</b>	<b>Reason for transferring or disclosing of personal data</b>
Providers of cloud service	Happydress stores its data in cloud services, hence your personal data may be disclosed to providers of such cloud services (such as Microsoft, Google and Amazon).
Suppliers and business partners	Happydress may disclose your personal data to different suppliers in our business (personal data processors). This occurs when suppliers or business partners need your personal data to fulfil their obligations to Happydress. For example, Happydress uses external business systems for order and warehouse management. Further, Happydress cooperates with Klarna and DIBS for secure payments of purchased Happydress products. These are the reasons Happydress discloses some of your personal data to Klarna and DIBS.
Sales consultants	Personal data may be disclosed to Happydress sales consultants who represent Happydress and sell its products. Personal data is disclosed during sales and marketing of the Happydress brand and products.
Government bodies	Personal data may be disclosed to government bodies when doing so is required to comply with legislative obligation.

Happydress strives to process your personal data within the EU/EEA. Happydress does not transfer your personal data to countries outside the EU/EEA apart from what is stated below. If personal data is transferred to a non-EU/EEA country, then Happydress will take action to ensure that personal data remain protected and also take necessary action to transfer personal data in a legal manner to non-EU/EEA countries.

Happydress uses cloud service providers Microsoft, Google and Amazon, with data storage servers located in the United States. Through Happydress' use of those providers, your personal data may be transferred to the United States. Your personal data collected by Happydress through your usage of the Happydress website may be transferred to Google in the United States, through Google Analytics. Happydress has ensured that your

rights are maintained when transferring of your personal data to the United States, through Microsoft's, Google's and Amazon's agreement with EU-US Privacy Shield. More information is available at [www.privacyshield.gov](http://www.privacyshield.gov).

## **7 SOCIAL MEDIA**

As for the personal data that is present and processed on social media such as Facebook, Instagram and LinkedIn, we refer users to the relevant social media provider's data protection policy. Happydress' purpose with this processing is that existing customers, potential customers and business partners of Happydress shall be able to interact and keep in contact with Happydress through social media. By doing so, Happydress wants to contribute to good relationships with its customers and business partners and it makes Happydress' customer service easily accessible through several channels. The processing is necessary to meet Happydress' legitimate interest in marketing its brand and its products to existing and potential customers as well as to business partners (balance of interests).

## **8 YOUR RIGHTS**

Provided Happydress is the personal data controller for your personal data, you may, at any time and free of charge, request access to information about what personal data concerning you that is processed, the purpose of the processing and information about where the personal data was collected, and to what recipients the data has been disclosed or will be disclosed. You have the right to receive information about the envisaged period for which the personal data will be stored, or the criteria used in determining this period. The request to access such information shall be in writing and sent to Happydress at the address specified below under section "Contact".

You have the right to data portability, meaning the right to, under certain conditions, receive your personal data in a structured, commonly used and machine-readable format and have such data transmitted to another personal data controller.

Happydress will, at your request or on its own initiative, rectify, de-identify, supplement or erase data that is found to be incorrect, incomplete or misleading. Happydress is in some circumstances obligated to process your personal data even though you have requested to have them deleted.

You have the right, under certain conditions, to request restriction of the continued processing of your personal data (for example, if you are questioning the accuracy of your personal data or the lawfulness of the processing) and a right to object to the processing under the conditions permitted by applicable data protection laws.

If you wish to exercise any of the above-mentioned rights, or if you have any questions regarding personal data stored by Happydress, or questions about this Privacy Policy, please do not hesitate to contact Happydress (for contact details, see section "Contact" below).

Please contact Happydress if you are dissatisfied with Happydress' processing of your personal data, and Happydress will do its best to respond to your complaints. Your personal privacy is very important to Happydress, and Happydress always strives to protect your personal data in a relevant and safe manner. Should Happydress still, in your opinion, fail in this ambition, please note that you are also entitled to file a complaint with the (Swedish) Data Protection Authority during 2018.

## **9 COOKIES**

Happydress uses cookie-like technologies to provide certain features on the website [www.houseoflola.fi](http://www.houseoflola.fi) as well as to improve our website and deliver a better and more personalised service. The information is stored in a file containing encrypted login data. The information is used for automatic login and to remember any selection of settings on the website.

## **10 LINKS TO OTHER WEBSITES**

At [www.houseoflola.se](http://www.houseoflola.se), there may be links to external web pages that Happydress does not control. These external web pages are not covered by this Privacy Policy. Happydress accepts no responsibility for the content of the web pages linked to and from [www.houseoflola.fi](http://www.houseoflola.fi).

## **11 CONTACT**

If you have questions regarding how Happydress handles your personal data or if you wish to exercise your rights, please contact Happydress via customer service at [asiakaspalvelu@houseoflola.fi](mailto:asiakaspalvelu@houseoflola.fi), by phone +46-10-666 75 74 or by mail to Happydress OY, c/o Happydress AB, Kungsgatan 111 , 753 18 Uppsala, Sweden.

## **12 AMENDMENTS**

Happydress has the right to amend this Privacy Policy at any time. If amended, Happydress will publish the updated Privacy Policy at [www.houseoflola.se](http://www.houseoflola.se) with information on when the changes come into effect, and otherwise also inform its customers and business partners.