



NETHANSA

Privacy Policy

**regarding Amazon Marketplace
Web Service APIs services**

This Privacy Policy describes how Nethansa Sp. z o.o. with its registered office in Sopot (81-824), Poland, ul. Armii Krajowej 116/19, entered into the Register of Entrepreneurs of the National Court Register under no.: 0000192382 (“we”, “us”, “our” or “Nethansa”) process, shares and secures the personal data vended and retrieved through Amazon Marketplace Web Service (Amazon MWS) APIs, including the Marketplace Web Service APIs.

1. CATEGORIES OF DATA

The data vended and retrieved through Amazon MWS APIs can be both public or non-public, including personal data about Amazon Customers.

By a “Customer” we mean any person or entity who has purchased items or services from Amazon's public-facing websites.

The personal data of Customers vended and retrieved through Amazon MWS APIs and processed by us may include the following: name, address, e-mail address, phone number, gift message content, payment status, purchases.

2. OUR ROLE

We are owner of our proprietary Clipperon sales automation system, allowing to automate sales and logistics processes and manage the sale of products on Amazon in a convenient and simple way. Moreover we provide the Sellers with various services related to Amazon marketplaces.

By a “Seller” we mean any person or entity selling on Amazon's public-facing websites.

We use the Marketplace APIs only for the purpose of enhancing and integrating the Sellers’ systems with Clipperon system and the features and functionalities permitted by Amazon to be accessed through the Marketplace APIs.

In respect of personal data vended and retrieved through Amazon MWS APIs and processed by us in connection with Clipperon system and other services provided to the Sellers, the data controller shall be the Seller. The role of Nethansa in relation to the processing of such personal data shall be exclusively that of data processor on behalf of the Seller. Thus we enter into data processing agreement with the Seller.

3. PURPOSE OF DATA PROCESSING

The personal data vended and retrieved through Amazon MWS APIs will be processed by us, as the developer and data processor, in accordance with applicable privacy laws, including the General Data Protection Regulation (GDPR) and documented instructions of the Seller, solely for the purpose to fulfill orders placed by the Customers at Amazon marketplace with the Seller.

We do not process personal data vended and retrieved through Amazon MWS APIs for our own purposes.

4. DATA RETENTION PERIOD

We may retain and process the personal data vended and retrieved through Amazon MWS APIs as long as is necessary to fulfill orders, however in each case no longer than 30 days after order shipment. After the expiry of that period the personal data are permanently and securely deleted (in accordance with industry-standards). We may also delete and/or return such any Amazon data sooner, promptly after we receive Amazon’s request in that respect.

5. DATA SHARING

We do not disclose data, individually labeled or aggregated, vended and retrieved through Amazon MWS APIs on behalf of a Seller to any third party, unless required by law.

6. DATA SECURITY

We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk related to processing of the personal data vended and retrieved through Amazon MWS APIs, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing, in order to:

- (a) maintain the security and confidentiality of such data accessed, collected, used, stored, or transmitted by us;
- (b) protect such data from known or reasonably anticipated threats or hazards to its security and integrity, accidental loss, alteration, disclosure, and all other unlawful forms of processing.

These include, but are not limited to, the following:

- (a) ensuring proper data governance through the implementation of the personal data protection policy and registers of processing activities and categories of processing activities;
- (b) implementation of the role-based-access-control, based on a "need-to-know" basis and raising awareness of our employees;
- (c) implementation of the procedures aimed at handling security incidents, including logging and monitoring of our systems;
- (d) implementation of the technical measures such as network protection controls, data backups at regular intervals as well as encryption of data in transit and data at rest, including backups.

We monitor, review and update implemented technical and organizational measures on a regular basis.

7. YOUR RIGHTS

In relation to the processing of personal data covered by this Privacy Policy a data subject is entitled to specific rights in accordance with applicable privacy laws, including the General Data Protection Regulation (GDPR).

For further information in this regard, please contact the given Seller who is the data controller.

8. CONTACT US

If you have any questions or requests regarding the data vended and retrieved through Amazon MWS APIs in connection with the services we provide, please contact us:

- (a) electronically to the e-mail address: office@nethansa.com;
- or
- (b) in writing to the following address: Nethansa Sp. z o.o., ul. Armii Krajowej 116/19, 81-824 Sopot, Poland.

9. CHANGES

We may update this Privacy Policy from time to time without prior notice.

Any changes to our Privacy Policy will become effective upon posting of the updated Privacy Policy on our website. If we change this Privacy Policy, we will revise the effective date at bottom thereof.

We recommend that you periodically review this Privacy Policy for any changes.

Effective date: 12/08/2019