

PRIVACY POLICY

ELVT

How we collect, use and protect your personal data

Privacy Policy

At ELVT, we respect your privacy. This Privacy Policy explains which personal data we collect and process when you visit our website, contact us, submit a booking request or book one of our workshops. It also explains why we process your personal data and what rights you have.

1. Who is responsible for your personal data?

ELVT is responsible for the processing of personal data through this website.

2. Which personal data do we process?

The personal data we process depends on how you use our website and services.

Information you provide directly

We may process the following information when you complete a contact form, submit a private-event request, make a booking or otherwise contact us:

- your first and last name;
- your email address;
- your telephone number;
- your billing and payment information;
- your booking details;
- your preferred date, time and workshop;
- your shoe size and other workshop preferences;
- information about a private event or group booking;
- the content of your message or request;
- any other information you choose to provide to us.

Please do not provide sensitive personal information through our forms unless it is necessary for your request.

Technical information

When you use our website, certain technical information may be processed automatically, including:

- your IP address;
- your device type;
- your browser type and settings;
- session information;
- security and error information;
- information required for the website, forms, bookings and payment functions to operate correctly.

We do not use advertising-tracking cookies or analytics cookies such as Google Analytics unless this is stated otherwise and, where required, you have provided your consent.

3. Why do we process your personal data?

We may process your personal data for the following purposes:

- to answer your questions and contact requests;
- to process workshop and private-event enquiries;
- to manage, confirm and provide bookings;
- to check the availability of your preferred shoe size;
- to process payments, refunds and cancellations;
- to communicate with you before or after a workshop;
- to provide customer service;
- to maintain our financial and business records;
- to keep our website secure and functioning correctly;
- to prevent misuse, fraud and security incidents;
- to comply with legal and regulatory obligations;
- to establish, exercise or defend legal claims.

We do not use your personal data for email marketing unless you have expressly agreed to receive such communications.

4. What are our legal grounds for processing?

Depending on the situation, we process your personal data on one or more of the following legal grounds:

- **Performance of a contract:** when processing is necessary to manage a booking, payment, workshop or private-event request.
- **Legitimate interests:** when processing is necessary to answer enquiries, provide customer service, secure our website, prevent misuse or manage our business.
- **Legal obligation:** when we are required to retain or disclose information under applicable law, including tax and accounting legislation.
- **Consent:** when we specifically ask for your permission, for example for optional marketing communications or non-essential cookies.

Where we rely on consent, you may withdraw your consent at any time.

5. How long do we retain your personal data?

We do not retain your personal data for longer than necessary for the purpose for which it was collected, unless we are legally required to retain it for a longer period.

We generally apply the following retention periods:

- **General contact enquiries:** up to 12 months after your enquiry has been handled.
- **Uncompleted booking or private-event requests:** up to 12 months after our last contact.
- **Booking and customer information:** for as long as necessary to provide the workshop, handle follow-up questions and resolve possible disputes.
- **Financial, payment and administrative records:** generally seven years, where required under Dutch tax and accounting legislation.

- **Technical and security data:** for as long as reasonably necessary to operate and protect our website.
- **Information relating to complaints or legal disputes:** for as long as necessary to handle the matter and protect our legal position.

We may anonymise certain information so that it can no longer be linked to you. Anonymised information may be retained for longer.

6. Who do we share your personal data with?

We only share personal data when this is necessary to provide our services, operate our website or comply with a legal obligation.

We may share relevant personal data with:

- Wix, which hosts and supports our website, forms and booking functions;
- payment service providers that process payments and refunds;
- email and communication service providers;
- bookkeeping, accounting or administrative service providers;
- professional advisers, such as accountants or legal advisers;
- government authorities or supervisory bodies when we are legally required to do so.

These parties may only process personal data for the relevant purpose and must protect it appropriately. Where required, we enter into data-processing agreements with service providers that process personal data on our behalf.

We never sell or rent your personal data to third parties.

7. International transfers of personal data

Some of our service providers, including Wix and its sub-processors, may process personal data outside the European Economic Area.

Where personal data is transferred internationally, appropriate safeguards will be used where required by law. These may include an adequacy decision by the European Commission or approved Standard Contractual Clauses.

8. Cookies

We only use functional and strictly necessary cookies that are required for our website, forms, bookings, payment functions and security features to work correctly.

We do not use marketing, advertising or analytics cookies unless this is clearly disclosed and, where required, you have given your consent.

More information is available in our Cookie Policy.

9. Security

We take appropriate technical and organisational measures to protect your personal data against loss, misuse, unauthorised access, disclosure, alteration and destruction.

However, no website or electronic transmission is completely secure. We therefore cannot guarantee absolute security.

10. Your privacy rights

Under applicable data-protection legislation, you may have the right to:

- request access to your personal data;
- request correction of inaccurate or incomplete personal data;
- request deletion of your personal data;
- request restriction of the processing of your personal data;
- object to certain processing based on legitimate interests;
- withdraw your consent at any time;
- request the transfer of your personal data where the right to data portability applies;
- lodge a complaint with a supervisory authority.

These rights are not absolute and may be subject to legal conditions or exceptions. For example, we may be required to retain certain financial records even after you request deletion.

To exercise your rights, please contact us at:

info@elvtstudio.nl

We may ask you to provide information to verify your identity before processing your request.

You also have the right to submit a complaint to the Dutch Data Protection Authority, the Autoriteit Persoonsgegevens.

11. Third-party websites

Our website may contain links to third-party websites or services. We are not responsible for the privacy practices or content of these external websites.

We recommend reviewing the privacy policy of each external website you visit.

12. Children's privacy

Our website and workshops are not specifically directed at children under the age of 16.

If a participant is under the age of 16, a parent or legal guardian may need to provide consent or make the booking on their behalf.

13. Changes to this Privacy Policy

We may update this Privacy Policy when our website, services, business practices or applicable laws and regulations change.

The most recent version will always be published on this page. The date at the top of this Privacy Policy shows when it was last updated.

14. Contact

If you have any questions about this Privacy Policy or how we process your personal data, please contact us:

ELVT

Location: Rotterdam, the Netherlands

Email: info@elvtstudio.nl

Website: www.elvtstudio.nl