

Data Protection Declaration of the "Cellarium" Web Shop

March 26, 2018

1. Preamble

The "Cellarium" shop offers various goods mainly from monastery shops and Christian orders online through the "Cellarium" web shop (<http://www.cellarium.at>) and in sales exhibitions. We collect personal information only at online purchases in the "Cellarium" web shop.

A session for a purchase transaction is created when a customer puts the first product into the shopping cart. This session initially contains only the selected items and the IP address of the accessing computer; it is identified by a unique ID. We collect customer data only when the customer enters the page "Place an Order". The website changes from HTTP to HTTPS at this occasion (or if the customer enters the "Contact" page). Customers may pay for their order with PayPal® or request an invoice. PayPal® provides most of the required data; in contrast, customers must enter their data completely themselves if paying by invoice. Based on general considerations, we *do not use* user tracking or profiling strategies. The publicly available pages of the "Cellarium" web shop do not even require the use of cookies.

2. Customer Data – Orders at the "Cellarium" Web Shop

2.1. Collected and Stored Data

- Type and make of browser, type of access (with/without JavaScript support), IP address and name, start and end of the session
- Ordered products
- Kind of payment (PayPal® or invoice)
- Name (required for orders), Title
- Email address (required for orders)
- Phone number (required for orders)
- Delivery address (required for orders)
- Invoice address (optional, if different from the delivery address)
- Customer's remarks
- Upon purchase of alcoholic products: Legally binding declaration of the customer to have reached the minimum age for a purchase of these products
- Various information on PayPal® transactions
- Date and time of payment, shipment and completion of the internal processing of the order
- An invoice (if it was possible to determine the shipping cost automatically), netted in the case of a payment with PayPal®, otherwise an offer for the ordered goods.

2.2. Use of the Data

We require the data collected for processing the purchase, payment and delivery of the ordered goods. The transaction information serves as proof of a sale to the finance authorities. Only the owners of the "Cellarium" web shop can access the data over an authenticated administration system.

We delete transactions that were aborted *before* customer data were entered within 30 days maximum; we keep orders that were aborted *after* customer data were entered

until we have contacted the customer to clarify whether the cancellation of the order was intentional or by mistake, and delete them as well within 30 days.

2.3. Viewing Rights

We display the data entered by the customers prior to the completion of the purchase process for checking and potentially correction by the customers. After completion of the purchase they receive an invoice or an offer that contains the data they specified. It is in the customers' discretion to inform the "Cellarium" web shop of mistakes in their data. However, faulty or incomplete address data are prone to delay or even prevent the delivery of the ordered goods.

2.4. Disclosure of Data

For reasons of principle, we do not disclose the data we received from our customers in the course of an order or inquiry. The only exception is the shipment of the ordered goods through a shipping company which obviously requires the name and address of the recipient of the order. Apart from that, we do not disclose by any means customer data to external persons.

In case of a payment via PayPal®, PayPal® receives from the "Cellarium" web shop only the purchase price of the order but no information on the ordered goods or the customer. In contrast, PayPal® returns to the "Cellarium" web shop the name of the buyer and a delivery address that the buyer determined within the PayPal® site.

2.5. Right of Access by the Data Subject

We grant to any person the right of access to data pertaining to her or him which are possibly stored in the "Cellarium" web shop.

2.6. Right to Rectification

We newly collect customer data at any purchase transaction, either by direct input by the customer, or from a payment with PayPal®. Rectification of customer data is therefore largely irrelevant once a transaction has been successfully completed; it is, however, not only possible but desirable before (see 2.3).

2.7. Right to Erasure, Right to Restriction of Processing, Right to Object

We comply with requests for the erasure of customer data insofar as this is in accordance with legal, in particular financial-legal, regulations and does not infringe important interests of the "Cellarium" web shop. In case a complete deletion of customer data is not possible for technical reasons but possible under the particular circumstances, we can disguise customer data in a way that it is not possible to connect them to a certain person any more. We only process purchase data for accounting purposes; we do not use them for any other purpose, e.g., profiling. Accesses to the pages of the "Cellarium" web shop are only counted in a neutralized form for statistical purposes.

2.8. Right to Data Portability

Each transaction in the "Cellarium" web shop is self-contained and not linked to possible other transactions of the same customer. The set of data stored for each transaction is basically identical to the contents of the invoice or offer created for the transaction, which the customer has received anyway. We can provide upon request, though, customers with their own data in one of the usual data formats.

2.9. Duration of Data Storage

The storage period of transaction records depends on the final status of the transaction:

- Sessions that have been aborted *prior to* the entry of customer data are deleted within 30 days, provided they are at least one day old. The one day waiting period protects currently active sessions from being inadvertently erased.
- Sessions that have been aborted *after* customer data have been entered are deleted after we have contacted the customer to determine whether aborting the session was intentional or inadvertent. They are also deleted after a maximum of 30 days.
- Completed purchase transactions: We have to keep the data of such transactions, also in electronic form, at least for the period of seven years required by finance laws. Since it is improbable that the need arises for the "Cellarium" web shop to contact its customers more than three months after a purchase was completed, we delete the email address and phone number from the electronically stored records after three months. However, legal claims of customers can possibly be made up to 30 years after a purchase. We have therefore to keep documents in a secure archive for this period which are relevant to each transaction for which it is not impossible from the outset that a customer claims damages.

3. Customer Data – Inquiries over the Contact Page of the "Cellarium" Web Shop

3.1. Collected and Stored Data

- Type and make of browser, type of access (with/without JavaScript support), IP address and name, start and end of the session
- Name (required)
- Email address (required)
- Phone number (optional)
- Customer's remarks

3.2. Use of the Data

We require the data collected for answering the inquiries of customers. Only the owners of the "Cellarium" web shop can access the data over an authenticated administration system.

We delete contact data we have received through an inquiry over the contact page within 30 days after answering the inquiry or processing a possible order resulting from the inquiry, unless there are important reasons to have them archived in a secure archive (see 3.9).

3.3. Viewing Rights

Visitors of the "Cellarium" web shop who placed an inquiry over its contact page receive a copy of their inquiry by mail which contains, at least implicitly, all compulsory data they submitted in their inquiry.

3.4. Disclosure of Data

For reasons of principle, we do not disclose the data we received from our customers in the course of an inquiry. We make sure that inquiries are anonymized if we have to pass them on in special cases to third persons.

3.5. Right of Access by the Data Subject

We grant to any person the right of access to data pertaining to her or him which are possibly stored in the "Cellarium" web shop.

3.6. Right to Rectification

We newly collect customer data at any inquiry over the contact page. Rectification of customer data is therefore largely irrelevant once an inquiry has been successfully answered.

3.7. Right to Erasure, Right to Restriction of Processing, Right to Object

We delete all contact data – name, email address and phone number – once we have processed an inquiry from the contact page of the “*Cellarium*” web shop. We do not process this data beyond the purpose of answering the inquiry. We grant the above rights to our customers; however, they are largely irrelevant due to their treatment described above.

3.8. Right to Data Portability

Each inquiry to the “*Cellarium*” web shop is self-contained and not linked to possible other transactions of the same customer. The set of data stored for each transaction is basically identical to the contents of the inquiry, apart from the fact that we delete the contact data once the inquiry has been processed. We can provide upon request, though, customers with their own data (if still available) in one of the usual data formats.

3.9. Duration of Data Storage

We delete all contact data – name, email address and phone number – in inquiries over the contact page within a maximum of 30 days after they have been answered or an order possibly resulting from the inquiry has been processed, unless they are related to transactions for which potentially legal claims could be derived (see 2.9). In this case we keep them in a secure archive for the limitation period of possible legal claims, which can be up to 30 years.

4. Data Security Measures

For performance reasons, we primarily offer the website of the “*Cellarium*” web shop (<http://www.cellarium.at>) in HTTP mode. However, the site switches to HTTPS once the customer accesses any page which requires the input of personal information (in particular, the order and contact pages). The administration system of the “*Cellarium*” web shop runs exclusively under Secure HTTP. Access to the administration system is only granted to the owners of the “*Cellarium*” web shop after appropriate authentication. Logins to the administration system are logged. Access to personal data kept in the “*Cellarium*” web shop is exclusively possible from the administration system (and via specially secured interfaces for the technical maintenance of the server).

The “*Cellarium*” web shop uses the payment functions of PayPal®. PayPal® poses very strict requirements on the quality of the SSL encryption processes used by websites which access their payment functions. By ensuring the proper operation of PayPal® we implicitly make sure that the server on which we operate the “*Cellarium*” web shop complies with current security standards.

Having completed their order, customers receive a mail with their invoice and a link with which they also can retrieve their invoice from the “*Cellarium*” website. The name of the invoice is randomly chosen from more than 10⁴⁸ possible names, which makes it practically impossible to guess it. In addition, we move the invoice file to a place where it can no more be accessed from the web when we mark an order as completed in the administration system. The invoice is then accessible only from within the administration system.

We use a special function which checks the entire “*Cellarium*” web shop including its administration system for unexpected changes. This allows us to detect technically caused problems in the server’s file system as well as possible hacker attacks.