



Spring Grass Publishing

PRIVACY POLICY

This Privacy Policy applies to: www.spring-grass.com

Last update: November 29, 2020

The respect of your private life is of the utmost importance for Spring Grass Publishing Ltd., who is responsible for this website.

This Privacy Policy aims to lay out:

- the way your personal information is collected and processed. "Personal information" means any information that could identify you, such as your name, your mailing address, your email address, your location and your IP address. "Personal information" is a synonym for "personal data" within the meaning of the Regulation 2016/679 of the European Union (General Data Protection Regulation);
- your rights regarding your personal information;
- who is responsible for the processing of the collected and processed information;
- to whom the information is transmitted;
- if applicable, the website's policy regarding cookies.

This Privacy Policy complements the Terms and Conditions that you may find at the following address: www.spring-grass.com

1. COLLECTION OF PERSONAL INFORMATION

We collect the following personal information:

- Last Name
- First name
- Mailing address
- Postal code
- Email address
- Phone and/or fax number

- Credit card number
- Date of birth/age
- Education
- Preferences (literature, music, films...)
- Other:
information on family members

The personal information we collect is collected through the collection methods described in the following section.

2. FORMS AND METHODS OF COLLECTION

Your personal information is collected through the following methods:

- Website registration form
- Order form
- Survey form
- Contest
- Other:
satisfaction questionnaire, customer reading interests, or the like

We use the collected data for the following purposes:

- Order tracking
- Special offers
- Statistics
- Contact
- Managing the website
- Other:
regulatory requirements or employee training

3. INTERACTIVITY

Your personal information is also collected through the interactivity between you and the website. This personal information is collected through the following methods:

- Correspondence
- Information for promotional offers
- Other:
 - publications of the winners of the contests on the Website;
 - the correspondence with the Website editor, managers and technique support.

We use the personal information thus collected for the following purposes:

- Statistics
- Contact
- Website management
- Other:
regulatory requirements or employee training

4. COOKIES AND LOG FILES

We collect information through log files and cookies. These allow us to process statistics and information on traffic on the Website, to ease navigation and improve your experience for your comfort.

Under the applicable legislations and regulations, the use of cookies and log files that involves personal information saving and analysis requires your consent.

Your consent is considered to be valid unless you request a withdrawal in writing to the email: info@spring-grass.com.

a) Cookies used by the Website

The cookie files used on the Website are the following:

- IP address
- Operating system
- Pages visited and queries
- Day and time of connection
- Other:
 - content of an electronic shopping cart or order placement/execution function;
 - provenance of users and visitors of the Website.

The use of such files allows us to achieve the following purposes:

- Improvement of the service and personalized welcome
- Personalized consumption profiles
- Order tracking
- Statistical surveys
- Other:
 - promotional purposes;
 - managing the Website

By using the Website, cookies from the following third parties may be saved on your hard disk:

- Google;
- Wix;
- Paypal;
- and the like, if any

The website also embeds sharing and social media networks buttons that allow you to share your activity on the Website. Cookies and log files from the social media networks may be saved on your computer when you use these features.

These websites have their own privacy policy and terms and condition that may be different than ours. We invite to look at the privacy policies and terms and conditions from these websites.

b) Objection to the use of cookies and log files by the Website

You have the right to object to the recording of these cookies and log files by configuring your web browser.

Once you have deactivated cookies and log files, you may continue your use of the Website. However, any malfunction resulting from this deactivation may not be considered of our making.

5. SHARING PERSONAL INFORMATION

We are committed to not selling to third parties or otherwise commercialize the personal information we collect. However, we may share this information with third parties for the following reasons:

- Consumption profiles
- Order fulfillment
- Partnership
- Advertising
- Other:
 - Regulatory requirements;
 - Employee training

6. STORAGE PERIOD OF PERSONAL INFORMATION

The controller will keep in its computer systems, in reasonable security conditions, the entirety of the personal information collected for the following duration: as per required by relevant laws.

7. HOSTING OF PERSONAL INFORMATION

Our website is hosted by: Wix.com LTD, located at the following address:

40 Namal Tel Aviv, 6350671,Israel.

The host may be contacted at the following phone number: to be contacted via www.wix.com.

Personal information we collect and process is transferred to the following countries: that are operated by Google, Wix, Paypal etc.

The transfer of personal information outside of the European Union is justified by the following reasons:

The personal information may be hosted by Google, Wix, Paypal, etc at the locations deemed appropriate by these companies beyond the discretion of Spring Grass Publishing Ltd.

8. CONTROLLER

a) Controller

The "Controller" is: Raye Liu. The Controller may be contacted as follows:

The Controller may be joined by phone at +1(778)712-8857, Monday to Friday from 9am to 5pm US/Canada Eastern Time or by email at info@spring-grass.com

The Controller is in charge of determining the purposes for which personal information is processed and the means at the service of such processing.

b) Obligations of the Controller

The Controller is committed to protecting the personal information collected, not to transmit it to third parties without informing you, and to respect the purposes for which personal information was collected.

In the event that the integrity, confidentiality or security of your personal information is compromised, the Controller is committed to notify you.

9. RIGHT OF OBJECTION AND OF WITHDRAWAL

You have the right to object to the processing of your personal information by the Website ("right to object"). You also have the right to request that your personal information does not appear, for example, on a mailing list ("right to withdraw").

If you wish to exercise the right to object or the right to withdraw, you must follow the procedure described hereinafter:

The user must submit a request to the Controller at the email address indicated above.

10. RIGHT OF ACCESS, OF RECTIFICATION AND OF REMOVAL

You have the right to consult, update, modify or request the removal of information about you by following the procedure described hereinafter:

The user must submit a request to the Controller at the email address indicated above.

11. GENERAL PRINCIPLES RELATING TO THE COLLECTION AND PROCESSING OF PERSONAL DATA UNDER EUROPEAN REGULATION 2016/679

In accordance with the provisions of Article 5 of European Regulation 2016/679, the collection and processing of your personal data comply with the following principles:

- Lawfulness, fairness and transparency: your personal data may only be collected and processed with your consent. Every time your personal data is collected, you will be informed that your personal data is collected and for which reasons your personal data is collected;
- Limits purposes: the data is collected and processed for one or more purposes set out in this Privacy Policy;
- Data minimization: only personal data necessary for the purpose to which it is necessary is collected;
- Storage limited in time: personal data is stored for a limited time, of which you are notified;
- Integrity and confidentiality of collected and processed personal data: the Controller is committed to guarantee the integrity and confidentiality of the collected personal data.

In order to be lawful and to comply with Article 6 or European Regulation 2016/679, collection and processing will only occur if one of the following applies:

- You have given your express consent;
- Processing is necessary for the performance of a contract;
- Processing is necessary for compliance with a legal obligation;
- Processing is necessary in order to protect your vital interests or those of another physical person;
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority;
- Processing is necessary for the purposes of the legitimate interests pursued by the Controller or a third party.

12. DATA PROTECTION OFFICER PURSUANT TO EUROPEAN REGULATION 2016/679

The following person has been appointed as the Data Protection Officer (also referred to as DPO): Raye Liu.

The purpose of the Data Protection Officer is to ensure the successful implementation of the applicable European legislative provisions relating to the collection and processing of personal data.

The Data Protection Officer may be reached as follows:

By phone at +1(778)712-8857, Monday to Friday from 9am to 5pm US/Canada Eastern Time or by email at info@spring-grass.com

13. ADDITIONAL RIGHTS PURSUANT TO EUROPEAN REGULATION 2016/679

In accordance with European regulation relating to the processing of personal data, you also have the rights listed below.

In order for the Controller to grant your request, you must provide your first and last name, your email address.

The Controller must answer your request within a period of thirty (30) days.

a) Right to portability of personal data

You have the right to request the portability of your personal data held by the Website to another site by following the procedure described below:

The user must send an email to the Controller to the email address provided above and include all information on the account.

b) Right of not being the object of a decision based only on automated processing

In accordance with the provisions of the European Regulation 2016/679, you have the right of not being the subject of decision based solely on automated processing if the decision produces legal affecting concerning you or significantly affects you.

c) Right to submit a complaint to the competent authority

In the event that the Controller does not answer your request, you wish to challenge his or her decision or you believe one of your rights has been infringed upon, you have the right to submit a complaint to the competent authority.

14. CHANGES TO OUR PRIVACY POLICY

Our Privacy Policy may be viewed at all times at the following address:

www.spring-grass.com

We reserve the right to modify our Privacy Policy in order to guarantee its compliance with the applicable law.

You are therefore invited to regularly consult our Privacy Policy to be informed of the latest changes.

15. ACCEPTANCE OF OUR PRIVACY POLICY

By using our Website, you certify that you have read and understood this Privacy Policy and accept its conditions, more specifically conditions relating to the collection and processing of personal information, and the use of cookies.

16. APPLICABLE LAW

We are committed to respect the Canadian legislative provisions and those as specified in:

Personal Information Protection and Electronic Documents Act, SC 2000, c 5; and/or

Act Respecting the Protection of Personal Information in the Private Sector, CQLR cP-39.1; and

General Data Protection Regulation, Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 for the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

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