

LAST UPDATED IN FEBRUARY 2024.

For us at Because I Can Ltd, your privacy and the security of your personal data are very important, for this reason we collect and manage your personal data with care and take specific measures designed to keep your personal data secure. This privacy policy (“Privacy Policy” or “Privacy Notice”) contains information on the processing by Because I Can Ltd of your personal data in relation to your browsing and use of the website therow.com and all corresponding webpages thereof, applications, features, functionality, information and services made available by us on or through any of the foregoing (collectively, the “Website”). We also ask you to read the General Conditions of Use and the Conditions relating to registration, which contain additional information and terms and conditions governing your use of the Website. Some aspects of the Website may be subject to additional specific legal terms and conditions, in which case, such terms and conditions will be made available to you when you use or access such services.

General information. Who is the data controller?

Because I Can Ltd, Based At Suite 5, 5th Floor, City Reach, 5 Greenwich View Place, London, E14 9NN, UK, (Because I Can Ltd, stratiskas.com, “we”, “us”, “our”, etc.) is the Data Controller, namely the party which decides how and why to process your personal data. You can always contact Because I Can Ltd with any privacy-related questions or requests by writing to the above address or writing to sk@stratiskas.com

What personal data do we collect?

The categories of personal data that Because I Can Ltd collects and processes when you browse or shop on stratiskas.com, are as follows:

a) We collect the personal data necessary to complete and execute your purchase on the Website such as given name and surname, email address, shipping address, billing address, telephone and payment details.

b) We collect your email address when you sign up to receive newsletters or other marketing or promotional emails regarding Because I Can Ltd.

c) We process the personal data you provide us with when you contact our Customer Service to provide you with the assistance requested.

d) With your consent, we collect and use your personal data for marketing communications.

e) We collect information about your browsing on the Website, such as the pages you visit and how you interact with them.

f) With your consent, we may collect certain information, such as IP address, type of browser, type of device, unique advertising identifiers and type of operating system used, through cookies and/or similar technologies.

G) We may receive information about you from third parties, which may include social media services (e.g., Instagram) of which you are a registered user. Because I Can Ltd does not knowingly process minors’ personal data. If you access the Website and use services of Because I Can Ltd, you declare that you are above the age of majority in your jurisdiction.

How do we use the personal data collected?

Because I Can Ltd collects and processes your personal data for the following purposes:

a) Purchases. When you purchase a product on the Website, we ask you for the personal data necessary to finalize and confirm such purchase, such as payment and related anti-fraud checks, billing, shipping of the product and processing the return of such product, as applicable.

b) Registration on stratiskas.com. We use certain personal data you provide us as part of the registration process to provide you with a registered account on stratiskas.com and the services offered to registered users.

c) Provision of services offered on stratiskas.com. Because I Can Ltd collects, in relation to each service and its characteristics, the personal data necessary for the provision of the applicable service requested by you.

d) Customer Service requests. We collect and use the personal data you provide us when you send a request to our Customer Service, in order to process and respond to your request.

e) Analysis and statistical surveys. We may use certain information about your use of stratiskas.com, mode of browsing and use of the related services, to conduct analyses and statistical surveys in order to improve our offering and our services.

f) Transaction Communications. We use your personal data to send you to the email you provided us communications regarding orders you have placed on stratiskas.com (e.g., order confirmation, status updates, shipping and delivery notifications, etc.).

g) Marketing Communications. With your express consent, we may use the contact details you have provided to us, for purposes of sending you marketing communications on our products and services, in order to update you on news, new arrivals, exclusive products, and on our offers and promotions. In addition, with your consent, we may use your contact details to conduct market research and surveys for customer satisfaction in order to improve our services and our relationship with our users.

h) Personalized Services. With your consent, Because I Can Ltd may personalize your experience on stratiskas.com, which may include showing you previews and offers in line with your interests, and Because I Can Ltd may send you personalized marketing communications and personalized promotional offers. The personalization will be carried out by analyzing your previous purchases and other information described in the paragraph

‘What personal data do we collect?’. For more information on the personal data used for purposes of such personalization and on the related activities, please consult the paragraph ‘My Account’ .

If you authorize the activities referred to in points g) and h) and you subsequently wish to stop receiving further communications from Because I Can Ltd or you would like to limit how to be contacted, you can opt-out of these communications at any time by clicking on the dedicated link “Unsubscribe” at the bottom of each communication, or accessing your account, or contacting Because I Can Ltd by writing to the above address. You may receive further communications from us even after submitting your request, as some further communications may have already been planned, and our systems may take between 24 and 48 hours to process your request. Because I Can Ltd does not currently sell or disclose for business purposes any personal data collected by it in connection with use of stratiskas.com, and has not done so during the previous twelve month period.

Legal basis of the processing

If you are a user located within the European Economic Area, we only process your personal data if one or more of the following legal basis applies:

a) For the finalization and execution of a contract to which you are a party. When we process your data on this basis we take care to use only the minimum information necessary to execute the contract. This basis legitimizes the processing of personal data that takes place in the following activities:

a) Finalization and execution of a contract for the purchase of goods offered on stratiskas.com; · registration on the Website and use of the services reserved for registered users; · supply of services offered on stratiskas.com; · management of your requests by our Customer Service .The provision of your personal data for these activities is a contractual obligation. You are free to communicate your data or not, but in the absence of the requested

data it will not be possible to finalize or execute the contract and your requests. This means that you will not be able to purchase the products and to use the services of Because I Can Ltd and that Because I Can Ltd will not be able to process your requests.

b) To follow up on a legal obligation. In case of finalization of a contract for the purchase of goods on stratiskas.com, the processing of user data will take place to give effect to the legal obligations to which Because I Can Ltd is bound. You are free to decide whether to finalize a contract and whether or not to disclose your data, but if you finalize it your data will be necessary and will be processed to give effect to the aforementioned legal obligations to which Because I Can Ltd is bound.

c) Due to our legitimate interest. Certain personal data will be processed to carry out anti-fraud activities relating to your purchase of products on the website: we have a legitimate interest in carrying out this activity to prevent and prosecute any fraudulent activity. For internal administrative purposes, personal data may be processed by Because I Can Ltd parents, subsidiaries or other affiliated companies or our authorized service providers.

d) Based on your consent. We will carry out the following processing only if you have given us your express consent: marketing activities and market research and surveys; · analysis of your browsing data and your shopping habits when you are signed in to your account on stratiskas.com, in order to personalize your experience on the Website. The provision of your personal data for these activities is optional.

Who will process your data?

Your personal data will be processed by Because I Can Ltd and may also be transferred to and processed by Because I Can Ltd parents, subsidiaries or other affiliated companies. Your personal data may also be transferred to third parties for the purpose of (1) assisting with facilitating

transactions on or through stratiskas.com, (2) sending you advertisements for our products and services, (3) providing information technology and customer service assistance, and (4) providing, offering, supporting, administering, maintaining and enabling the provision of stratiskas.com and our services. These parties have been carefully selected by us and are required to comply with all applicable data protection regulations. These parties have been appointed as data processors and carry out their activities according to the instructions given by Because I Can Ltd and under its control. These third-parties belong to the following categories: site operator, banking operators, internet providers, IT companies, couriers, marketing companies, and companies specialized in market research and analysis. Your data may be disclosed to law enforcement and judicial and administrative authorities, in accordance with applicable law, for the investigation and prosecution of crimes, the prevention and protection from threats to public security, to allow Because I Can Ltd to ascertain, exercise or defend a right in court, as well as for other reasons related to the protection of the rights and freedoms of others. Because I Can Ltd may also use a variety of third parties, including advertising networks, data exchanges, traffic measurement service providers and marketing analytics service providers to, for example, serve advertisements on the Website, populate user-specific advertisements and/or measure and analyze advertising effectiveness and/or traffic on or in connection with stratiskas.com (“Third Party Advertising Providers”) through cookies and/or similar technologies. Such Third Party Advertising Providers may enable us to display advertisements based on your use of stratiskas.com and other websites, services and platforms you have used or visited.

Extra-eu transfer

If you are located in the EU, please note that Because I Can Ltd and some of the third parties listed in the paragraph ‘Who will process your data?’ may be established in countries outside the European Union. If you are located in the EU,

your personal data will only be transferred outside the EU (a) to countries that offer an adequate level of data protection, as established by specific decisions of the European Commission (http://www.garanteprivacy.it/home/provvedimenti-normativa/normativa/normativa_community-and-intentional/transfer-of-data-to-third-countries#1), or (b) pursuant to specific agreements containing safeguard clauses and appropriate guarantees for the protection of your personal data, known as “standard contractual clauses”, approved by the European Commission, or (c) if the data transfer is necessary for the finalization and execution of a contract between you and Because I Can Ltd (for the purchase of goods offered on stratiskas.com, for registration on stratiskas.com or use of services on stratiskas.com) or for the management of your requests.

How long do we keep the data?

We keep your personal data for a limited period of time, which differs depending on the type of activity that involves the processing of your personal data. After this period, your data will be permanently erased or otherwise irreversibly rendered anonymous. Your personal data are stored in compliance with the terms and criteria specified below:

a) Data collected to conclude and execute contracts for the purchase of goods on stratiskas.com: until the administrative and accounting formalities are finalized. The billing data will be kept for ten years from the billing date; data of the registered user: the data will be kept until you request cancellation of your account; payment details: up to the confirmation of the payment and to the finalization of the relative administrative and accounting formalities; data collected in the context of the use of services offered on stratiskas.com: this data is kept until the termination of the user’s account or the user’s request to terminate such service; data related to requests by users to our Customer Service : the data used to assist you will be kept until we determine that your request has been satisfied; data used for marketing activities for users who purchase

product on the Website: these data are kept until the termination of the service or until the user opts out of receiving marketing communications; data provided for marketing activities and market research and satisfaction surveys: up to the request by the user to interrupt the activity and in any case within two years from the last interaction of any kind by the user with Because I Can Ltd; data used to customize the Website and to show you customized sales offers: until you request that we stop providing such customized version of the Website and customized offers, and in any case within three years from the last interaction of any kind by the user with the Website. In irreversible anonymization of the related personal data shall be effective within thirty days from the terms indicated above. In any case, for technical reasons, the termination of the processing and the subsequent definitive deletion or irreversible anonymization of the related personal data shall be effective within thirty days from the terms indicated above.

Your rights

At any time you may exercise your rights with reference to the specific processing of your personal data by Because I Can Ltd. Please find below a general description of these rights and how to exercise them.

a) Access your personal data and rectify it: you have the right to access your personal data and to request that they are correct, modified or supplemented with other information. You may contact us to request a copy of your personal data in our possession.

b) Revoke your consent: you can revoke at any time the consent you may have given for the processing of your personal data for marketing purposes (i.e., for purposes of sending sales and promotional communications and conducting market research and surveys to determine the level of satisfaction and improve our services). Once we have received your request, we will promptly cease the processing of your personal data for marketing purposes.

c) Object to the processing of your data: you have the right to object to the processing of your personal data, under certain conditions.

d) Erasure of your data: you have the right to request the erasure of your personal data, under certain conditions.

e) Processing is unlawful but you oppose the erasure of your data, when the processing of your data is no longer needed but you need them for establishment, exercise or defense of legal claims and when you object to processing pending the verification of the reasons of your request.

f) Receiving your data and transferring it to a party other than Because I Can Ltd (right to data portability). You can ask to receive your data that we process based on your consent or on the basis of a contract with you in a standard format. You may request that we, where technically possible, transfer your data directly to a third party indicated by you. You can exercise the rights described above by accessing your account, or writing to me@stratisphotography.com or writing to the address of the data controller.

In order to ensure that the data of our users are not subject to breaches or unlawful use by third parties, before accepting your request to exercise one of the rights indicated, we will ask you to provide certain information so that we can verify your identity.

Security measures

We protect your personal data with specific technical and organizational security measures, aimed to prevent your personal data from being used unlawfully or fraudulently. In particular, we use security measures which are designed to ensure: the pseudonymization or encryption of personal data; confidentiality, integrity, availability of your personal data and the resilience of processing systems and services; the ability to restore personal data in case of data breach. Furthermore, Because I Can Ltd undertakes to regularly test, assess and

evaluate the effectiveness of such technical and organizational measures.

Complaints

If you are located in the EU and believe that the processing of your personal data has been carried out unlawfully, you can lodge a complaint with one of the competent supervisory authorities. In Italy, the complaint can be addressed to the Guarantor for personal data protection.

Changes to this notice

From time to time, we may modify this Privacy Notice to reflect industry initiatives, third party requirements or changes in the law, technology, our information collection and use practices or the features and functionality of the Website or our services, and such modifications shall be effective upon posting. When we change this Privacy Notice in a material way, a notice will be posted on the Website along with the updated Privacy Notice. Your continued use of the Website after we post a revised Privacy Notice (and, where appropriate, notify you of same) signifies your acceptance of the revised Privacy Notice. It is therefore important that you review this Privacy Notice regularly to ensure you are updated as to any changes. We may continue to process your information based on our legitimate interests or in order to fulfill our obligations under a contract and/or may also seek your affirmative consent to the terms of the updated Privacy Notice. For example, we may ask for your consent before implementing new uses of the personal data that we've already collected from you based on such consent, if such new use was not addressed by the privacy policy under which such information was collected or if our legal basis for processing such information changes.

THE PROCESSING OF YOUR PERSONAL DATA IS CARRIED OUT BY BECAUSE I CAN LTD IN FULL COMPLIANCE WITH, AS APPLICABLE, REGULATION (EU) 2016/679, GENERAL DATA PROTECTION REGULATION AND ANY OTHER APPLICABLE DATA PROTECTION LAW.