

EXTERNAL PRIVACY NOTICE

Last Updated 7 January 2025

We respect the privacy of every person who visits or registers with <https://www.visualstore.it> (the “**Site**”) and we are further committed to ensuring a safe online experience. We also respect the privacy of every person who uses the products and services that we make available from the Site or who engages with us to use the products or services that we provide through the Site (our “**Services**”), as well as those who applies to work with us.

1 PURPOSE OF THIS POLICY

This privacy notice (“**Privacy Notice**”) explains our approach to any personal information that we might collect from you or which we have obtained about you from a third party and the purposes for which we process your personal information, as requested by the European General Data Protection Regulation n. 2016/679 (also called “**GDPR**”) and by any other applicable data protection regulations (“**Data Protection Laws**”). This Privacy Notice also sets out your rights in respect of our processing of your personal information. For more information **click here**.

This Privacy Notice will inform you of the nature of the personal information about you that is processed by us and how you can request that we delete, update and/or provide you with access to it.

Please note that this Privacy Notice only applies to the use of your personal information obtained by us and collected through the Site or through the Services and it does not apply to your personal information collected during your communications with third parties.

2 WHO ARE WE AND WHAT DO WE DO?

The Site and our Services are operated by Toshiba Global Commerce Solutions (Italy) S.r.l., (“**we**”, “**us**” or “**our**”). For more information **click here**.

Toshiba Global Commerce Solutions (Italy) S.r.l. is the data controller responsible for: (i) your personal information collected and processed via the Site and or during the fulfillment of the purposes indicated below.

Toshiba Global Commerce Solutions (Italy) S.r.l. is an Italian company with registered company number MB 1892948 and whose registered office is at Via delle Industrie 31, 20883 Mezzago (MB) Italy.

Please note that depending on with which Toshiba Global Commerce Solutions entity you will enter into a contract in relation to the Services the following entities will act as autonomous data controllers responsible for your personal information processed in relation to the Services and to the fulfilment of the Contract:

- *Toshiba Global Commerce Solutions (Benelux) NV, Z.1 Research Park 160, 1731 Zellik, Belgium*
- *Toshiba Global Commerce Solutions (Denmark) ApS, H. C. Andersens Boulevard 38, 3. th., 1153 København V, Denmark*
- *Toshiba Global Commerce Solutions (France) SAS, 1-5 rue Eugène et Armand Peugeot, 92500 Rueil-Malmaison, France*
- *Toshiba Global Commerce Solutions (Germany) GmbH, Carl-Schurz-Str. 7, 41460 Neuss, Germany*
- *Toshiba Global Commerce Solutions (Nordic) AB, Frösundaviks Allé 1, 169 70, Solna, Sweden*
- *Toshiba Global Commerce Solutions (Poland) sp. z o.o., ul. Jutrzenki 137 02-231 Warsaw, Poland*
- *Toshiba Global Commerce Solutions (Spain) S.L., Calle Campezo 1, Parque Empresarial Las Mercedes, Edificio 6 – bajo B, 28022 Madrid, Spain*
- *Toshiba Global Commerce Solutions (U.K.) Ltd., 3375 Century Way, Thorpe Park, Leeds LS15 8ZB, England*

With specific reference to our use of your personal data collected in the context of the fulfilment of the Contract, please refer to the privacy policy attached to the Master Customer Agreement or the equivalent agreement in place between us.

3 HOW TO CONTACT US?

If you have any questions about this Privacy Notice or want to exercise your rights set out in this Privacy Notice, please contact us by:

- sending an e-mail to TGCS-EU-Dataprotection@toshibagcs.com
- sending an ordinary mail to the Toshiba Global Commerce Solutions entity at the address mentioned above

If you are accessing the Site from Italy or you are being provided Services in Italy, please note that Toshiba Global Commerce Solutions (Italy) S.r.l. has a Data Protection Officer whose details are as follows: dpo@toshibagcs.com or privacyitalia@toshibagcs.com

4 WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE USE IT?

To undertake our purposes we may process the following personal information:

If you are **a visitor** to the Site:

- *Name and job title.*
- *Contact information including email address.*
- *Demographic information such as postcode, preferences and interests.*
- *Navigation Data.*
- *Other information relevant to provision of Services.*
- *Third Parties Data provided by you.*

Please note that if you provide us with third parties data, you should ensure that such parties have been informed in advance about the purposes and methods of the processing of their data indicated therein. In this case, you will act as autonomous data controller, assuming all legal obligations and responsibilities, and you undertake to ensure that this processing is based on a suitable legal basis. Therefore, you undertake to indemnify and hold harmless the Data Controller against any dispute, claim, request for compensation for damage caused by processing, etc. by third parties whose personal data have been processed through the sending, for example, of your application in violation of the applicable data protection regulations.

If you are an **prospective customer**:

- *Name and job title.*

- *Contact information including email address and telephone number.*
- *Other information relevant to provision of Services.*
- *Relevant information as required by regulatory Know Your Client and or Anti Money Laundering regulations. This may possibly include evidence of source of funds, at the outset of and possibly from time to time throughout our relationship with clients, which we may request and/or obtain from third party sources. The sources for such verification may comprise documentation which we request from the prospective client or through the use of online sources or both.*
- *Any other information and data collected in and for the performance of the pre-contractual phase with the prospective customer.*

Primarily *Toshiba Global Commerce Solutions* is engaged by corporate prospective customers (i.e. other corporate entities) and as such those customers are not data subjects. However, as part of such instructions personal information about other persons may be provided to us (e.g. personal information relating, without limitation, to any of our corporate prospective clients' workers or subscribers, including the legal representative of the corporate prospective customers.)

If you are an **individual whose personal information may be processed by us as a result of providing the Services to others (including individual clients and corporate clients)** we will process a variety of different personal information depending on the Services provided in question.

The following is a non-exhaustive list which is reflective of the varied nature of the personal information processed as part of our business.

For instance, if we are providing technical support to a corporate customer for the benefit of a subscriber we may be provided with, and then process, personal information about that subscriber including but not limited to the subscriber's name and contact details.

We might also need to process personal information in relation to corporate customers' workers who use a Toshiba product in the course of their work for our corporate customer.

If you are a **potential recruit** to a Toshiba Global Commerce Solutions office:

- *Name and job title.*
- *Contact information including email address.*
- *Curriculum vitae, your education, employment history and similar matters and similar information that you may provide to us.*
- *Data related to health and other belonging to special categories, as strictly necessary in order to manage the recruitment process (e.g. selection processes dedicated to protected categories, execution of preventive pre-employment visits).*

- *Other information relevant to potential recruitment to Toshiba Global Commerce Solutions.*

We may use your personal information for the following purposes:

➤ **Fulfilment of Services. For more information click here.**

We collect and maintain personal information that you voluntarily submit to us during your use of the Site and/or our Services provided through the Site to enable us to perform the Services. Please note also that our [Terms of Business](#) also apply when we provide the Service.

Who do we share your personal information with for this purpose?

- *person authorised by the data controller to process personal data who have committed themselves to confidentiality;*
- *third parties services provider, appointed where necessary, as data processors;*
- *persons, entities or authorities to whom the communication of your personal data is mandatory by virtue of legal provisions or orders of the competent authorities;*
- *other Toshiba Global Commerce Solutions Entities.*

What is our legal basis?

It is necessary for us to use your personal information to perform our obligations in accordance with any contract that we may have with you or it is in our legitimate interest or a third party's legitimate interest to use personal information in such a way to ensure that we provide the Services in the best way that we can.

➤ **Customer services. For more information click here.**

Our Site uses various user interfaces to allow you to request information about our Services: these include printed and electronic enquiry forms and a telephone enquiry service. Contact information may be requested in each case, together with details of other personal information that is relevant to your Service enquiry. This information is used in order to enable us to respond to your requests.

Please note that in the context of the Help Desk Service, Toshiba Global Commerce Solutions Italy s.r.l., may also record the call for purposes related to the evaluation of the quality of the Service. To obtain further details on this processing activity, we invite you to visit the specific privacy policy available on the Site.

Who do we share your personal information with for this purpose?

Your personal data may be shared with:

- person authorised by the data controller to process personal data who have committed themselves to confidentiality;
- third parties services provider, appointed where necessary, as data processors;
- persons, entities or authorities to whom the communication of your personal data is mandatory by virtue of legal provisions or orders of the competent authorities;
- other Toshiba Global Commerce Solutions Entities.

What is our legal basis?

It is necessary for us to use your personal information to perform our obligations in accordance with any contract that we may have with you or it is in our legitimate interest or a third party's legitimate interest to use personal information in such a way to ensure that we provide the Services in the best way that we can.

➤ **Legal compliance. For more information click here**

We use your personal information in order to ensure compliance with our legal obligations and applicable regulations.

Who do we share your personal information with for these purposes?

We will share your personal information with professional advisers such as lawyers and accountants and/or governmental or regulatory authorities.

What is our legal basis?

The legal basis is our legal obligation to use your personal information to comply with any legal obligations imposed upon us.

➤ **To ascertain, exercise or defend rights in court or whenever the courts exercise their judicial functions and to prevent the commission of fraud and ensure the security of the Site and of our Services. For more information. Click here**

We may use your personal information to (i) ascertain, exercise or defend rights in court or whenever the courts exercise their judicial functions and to (i) prevent the commission of fraud and ensure the security of the Site and of our Services.

Who do we share your personal information with for these purposes?

We will share your personal information with services provider appointed where necessary, as data processors and with professional advisers such as lawyers and accountants and/or governmental or regulatory authorities.

What is our legal basis?

Our legal basis lies in our legitimate interest.

➤ **Recruitment. For more information click here**

We use your personal information for the following recruitment purposes:

- To assess your suitability for any position for which you may apply at Toshiba Global Commerce Solutions . including partner level positions, associate positions, training contract or summer placements and also any business support or services role whether such application has been received by us online, via email or by hard copy or in person application.
- To review Toshiba Global Commerce Solutions equal opportunity profile in accordance with applicable legislation, Toshiba Global Commerce Solutions does not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation. All employment related decisions are made entirely on merit.

Who do we share your personal information with for these purposes?

We will share your personal information with:

- persons acting as data processors and/or sub-processors;
- persons authorised by the data controller to process personal data who have committed themselves to confidentiality or have an appropriate legal obligation of confidentiality;
- other Toshiba Global Commerce Solutions Entities.

What is our legal basis?

Where we use your personal information in connection with recruitment it will be in connection with us taking steps at your request to enter a contract we may have with you or it is in our legitimate interest to use personal information in such a way to ensure that we can make the best recruitment decisions for Toshiba Global Commerce Solutions. We will not process any data belonging to special categories except where we are able to do so under applicable legislation or with your explicit consent.

➤ **Marketing communications. For more information click here**

We use information your address details, to send you marketing communications by traditional methods (e.g. paper mail, telephone contact), or by automated methods (e.g. by e-mail and sms).

Who do we share your personal information with for these purposes?

We share your personal information with a variety of third party postal providers who assist us in delivering our postal marketing campaigns to you.

What is our legal basis?

Our legal basis lies in our legitimate interest to use your personal information for postal marketing and, or, as requested by the applicable Data Protection Laws, is your consent.

5 OUR USE OF COOKIES AND SIMILAR TECHNOLOGIES

Our Site uses certain cookies, pixels, beacons, log files and other technologies of which you should be aware. **Please see our Cookie Policy** to find out more about the cookies we use and how to manage and delete cookies.

6 THIRD PARTY CONTRACTORS AND OTHER CONTROLLERS

As mentioned above, we may appoint sub-contractor data processors as required to deliver the Services, such as, without limitation, maintenance and support services, professional services, cloud services, who will process personal information on our behalf and at our direction. We conduct an appropriate level of due diligence and put in place necessary contractual documentation in relation to any sub-contractor to ensure that they process personal information appropriately and according to our legal and regulatory obligations.

Further, we may appoint external data controllers in common where necessary to deliver the Services (for example, but without limitation Toshiba Global Commerce Solutions entities). When doing so we will comply with our legal and regulatory obligations in relation to the personal information including but without limitation where necessary putting appropriate safeguards in place to ensure any personal information is processed according to our legal and regulatory obligations.

7 EXTRA-EEA TRANSFERS

If you are based within the EEA, please note that where necessary to deliver the Services we will transfer personal information to countries outside the EEA (including to Toshiba Global Commerce Solution's US entities) and other Toshiba Global Commerce Solutions entities via the Intra Group Data Sharing Agreement which utilises the standard contractual clauses set out by the European Commission as the extra-EEA transfer mechanism. When doing so we will comply with our legal and regulatory obligations in relation to the personal information including but without limitation having a lawful basis for transferring personal information and putting appropriate safeguards in place to ensure an adequate level of protection for the personal information.

8 HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

Generally, we will retain your personal information for the period of time strictly necessary for achieving the purposes for which the data were collected and in compliance with any applicable laws.

Regarding visitors to the Site, we will retain relevant personal information for at least one year from the date of our last interaction with you and in compliance with our obligations under the Data Protection Laws or for longer as we are required to do so according to our obligations.

Regarding personal information we have processed as part of providing the Services, we will retain relevant personal information for the period of time requested by the applicable civil and tax law and in compliance with our obligations under the Data Protection Laws (or for longer as we are required to do so according to our regulatory obligations). We may then destroy such files without further notice or liability. If you request your files and documents we may charge you for the costs of copying a duplicate.

If personal information is only useful for a short period e.g. for specific marketing campaigns we may delete it, after a period of time not exceeding one year from the date of our last interaction with you

Regarding personal information we have processed as part of the recruiting process, we will retain relevant personal information for the period of time strictly necessary for the management of the recruiting process and in compliance with any applicable laws- including Data protection Laws.

As per as personal information we may process in the context of Help Desk Service, we invite you to visit the privacy policy available on the Site.

9 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION

We are committed to keeping the personal information provided to us secure and we will take reasonable precautions to protect personal information from loss, misuse or alteration. For more information **click here**.

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- *unauthorised access;*

- *improper use or disclosure;*
- *unauthorised modification; and*
- *unlawful destruction or accidental loss.*

All of our members, employees, workers and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all visitors to the Site and all users of our Services.

10 HOW TO ACCESS YOUR INFORMATION AND EXERCISE YOUR RIGHTS?

You have the following rights in relation to the personal information we hold about you:

- **Your right of access. For more information click here.**
If you ask us, we'll confirm whether we're processing your personal information and, if necessary, provide you with a copy of that personal information (along with certain other details). If you require additional copies, as provided for in the applicable Data Protection Law, we may need to charge a reasonable fee.
- **Your right to rectification. For more information click here**
If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If you are entitled to rectification and if we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- **Your right to erasure. For more information click here.**
You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to erasure and if we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

➤ **Your right to restrict processing. For more information click here.**

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or you object to us. If you are entitled to restriction and if we've shared your personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

➤ **Your right to data portability. For more information click here.**

You have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

➤ **Your right to object.**

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
- processing your personal information for direct marketing.

➤ **Your rights in relation to automated decision-making and profiling. For more information click here.**

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

➤ **Your right to withdraw consent. For more information click here.**

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

➤ **Your right to lodge a complaint with the supervisory authority. For more information click here.**

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the supervisory authority of the country where the Toshiba Global Commerce Solutions entity resides acting as data controller and responsible for your personal information processed in relation to the Services. The competent national data protection authority can be found online by clicking on the following URL: [Our Members | European Data Protection Board](#).

11 COLLECTION OF INFORMATION BY THIRD-PARTY SITES AND SPONSORS

The Site contains links to other sites whose information practices may be different than ours. Visitors should consult the other sites' privacy notices as Toshiba Global Commerce Solutions has no control over information that is submitted to, or collected by, these third parties.

12 CHANGES TO THIS PRIVACY NOTICE

We may make changes to this Privacy Notice from time to time. For more information **click here**.

To ensure that you are always aware of how we use your personal information we will update this Privacy Notice from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We will notify you by e-mail of any significant changes. However, we encourage you to review this Privacy Notice periodically to be informed of how we use your personal information.