

**Feilo Sylvania Group**

**Cookie policy**

**- Global -**

# Feilo Sylvania Group websites and app cookie policy

## June 2022

### What are Cookies?

Cookies are small files that hold information about your browsing habits and browsing history. They are placed on your computer or other mobile device when you access websites or use apps. Cookies contain information that help remember certain information about you and your online actions. This information stored by cookies is considered to be personal data according to Regulation 2016/679 (EU) (General Data Protection Regulation, “GDPR”).

### Feilo Sylvania and Cookies

This Cookie Policy outlines how we use cookies, and it applies to websites directly managed by the Feilo Sylvania Group of companies, including Feilo Sylvania International Group Kft., the owner and operator of the website.

You can also read our Privacy Notice on our website and get in touch with us at [compliance@sylvania-lighting.com](mailto:compliance@sylvania-lighting.com) in case of any questions on cookies and privacy on our websites.

Please note that in case you click on a link on one of our websites that navigates you off our page to a third party’s website, this Cookie Policy does not apply after leaving our website, for the browsing on the third party’s website.

### How do we use cookies?

#### The parties who can access the information stored in the cookie on your device

When you visit our websites, there are two main ways the information stored in the cookies placed on your device can be accessed, depending on who the cookie belongs to:

1. **First-party cookies:** In this case the cookie placed on your device is managed by us, and only we can access the information stored in the cookie.
2. **Third-party cookies:** In this case the cookie placed on your device is managed by a third party, the “cookie manager”, and only this third party can access the information stored in the cookie.

The main types of cookies we use on our websites are the followings:

1. **Strictly necessary cookies**

These cookies are essential for the proper function of the website, without them, the websites might not load properly, or you might not be able to get the information or service you need. These cookies are necessary e.g., for logging whether you see error messages – so we can make improvements and fix bugs – as well as allowing you to use online shopping carts by remembering your choices and items already placed in the chopping cart as you navigate our site and to make a purchase.

As these cookies are strictly necessary for the functioning of the websites, we do not rely on your consent regarding these cookies, but we place them based on our legitimate interest in being able to provide a well-functioning service according to Article 6 (1) f) of the GDPR.

## **2. Personalisation cookies**

Personalisation cookies remember choices you have made to personalise the website, such as increasing the text size or choice of language, or where you are in the site so you can get tailored information. These cookies might as well store location information, if you ask for services based on your location, we store a cookie so that next time you visit, you won't have to tell us where you are again.

We place these cookies based on your consent, according to Article 6 (1) a) of the GDPR.

## **3. Analytics and measurement Cookies**

We use several technologies to better understand how visitors use our websites or app. This information helps us to identify areas for improvement, and to collect and report on commercial data, like sales volumes. We may, for example, test site content and functionality with different groups of visitors, analyse website usage and identify a page of the website where people may struggle to know what to do next. We then use session capture to observe some individual site visitors and find out what the issue is.

We only place these cookies based on your consent, according to Article 6 (1) a) of the GDPR.

Tools we use for analytics and measurement include Google Analytics, HotJar and Lead Forensics

### **Google Analytics (Google Inc.)**

Google Analytics is a web analysis service provided by Google Inc. (“**Google**”). Google utilizes the data collected to track and examine the use of our website, to prepare aggregated reports on its activities and share them with other Google services. Google also uses the data collected through our websites to contextualize and personalize the ads of its own advertising network.

Google and its servers used for Google analytics are located in the United States, therefore, the use of Google Analytics involves the transfer of personal data outside the EU to the United States. Currently, the United States is not considered to be a country where adequate level of protection is guaranteed for the processing of personal data according to the GDPR. Therefore, when using Google Analytics, contractual safeguards are in place to ensure appropriate level of protection. These are the so called Standard Contractual Clauses adopted by the European Commission and provided to us by Google, available here: Google Data Transfer Agreement, <https://policies.google.com/privacy/frameworks?hl=en-US>

Google acts as a data processor when using Google Analytics. Google's contact details are:

- **Address:** 1600 Amphitheatre Parkway in Mountain View, California, United States

- **Contact for privacy issues:** Privacy Inquiry form, [https://support.google.com/policies/contact/general\\_privacy\\_form](https://support.google.com/policies/contact/general_privacy_form)
- **Privacy Policy:** <https://policies.google.com/privacy?hl=en-US>

## Hotjar (Hotjar Ltd.)

Hotjar is a tool that analyses website user behaviour, it is provided by Hotjar Ltd., headquartered in Malta. All data that Hotjar collects is stored electronically in Ireland, Europe on the Amazon Web Services infrastructure no longer than 365 days. Provisions of Hotjar's Privacy Policy you will find at:

Hotjar Ltd. Acts as a data processor, and its contact details are:

- **Address:** Dragonara Business Centre, 5th Floor, Dragonara Road, Paceville St Julian's STJ 3141 Malta
- **Contact for privacy issues:** [support@hotjar.com](mailto:support@hotjar.com) and [dpo@hotjar.com](mailto:dpo@hotjar.com)
- **Privacy Policy:** <https://www.hotjar.com/legal/policies/privacy>

Hotjar Ltd. Uses sub-processors when providing its services, these are:

- Amazon Web Services, located in Ireland,
- Datadog, located in Germany, and
- Sentry, located in the United States.

In order to assure the appropriate level of protection for the processing of personal data in the United States, Hotjar Ltd. has entered into Standard Contractual Clauses with Sentry. More information on the Hotjar sub-processor is available here: <https://help.hotjar.com/hc/en-us/articles/360058514233-Sub-Processors-used-by-Hotjar>

## Lead Forensics

Lead Forensics offers a tool that analyses website traffic in an aggregate form and helps to create personalized communications and conversations with the website visitors.

Lead Forensics acts as a data processor, and its contact details are:

- **Address:** Data Compliance, Lead Forensics, Building 3000, Lakeside, North Harbour, Portsmouth, PO6 3EN, United Kingdom
- **Contact for privacy issues:** [data-compliance@leadforensics.com](mailto:data-compliance@leadforensics.com)
- **Privacy Policy:** <https://www.leadforensics.com/privacy-policy/>

## 4. Targeting or Advertising Cookies

These cookies collect information about your browsing habits (including details of the websites you have visited) which we use to make sure you receive relevant advertisement tailor-made to your interests. We, or third parties and advertising networks on our behalf further use the information collected by these cookies to show you ads you are interested in across the internet, including on other sites you visit, based on your interaction with our website, apps, and your browsing history.

If, for example, you visit our website and show an interest in one of our products but eventually decide not to buy it, we may re-target you with advertisements about this product on other websites and on search engine landing pages (that is, your Google search results page) for a number of days after your initial website visit. If you buy the product, or a set period of time has passed, the re-targeting advertising stops.

We only place these cookies based on your consent, according to Article 6 (1) a) of the GDPR.

Tools we use for marketing and advertising include: AddThis, Google Ads, Amazon Advertising, YouTube, and various display advertising providers.

## Google Ads and YouTube

Google Ads, provided by Google is an online advertising platform, where advertisers bid to display brief advertisements, service offerings, product listings, or videos to web users. It can place ads both in the results of search engines like Google Search and on non-search websites, mobile apps, and videos. YouTube is provided by Google and is thereby a platform that places advertisements using Google Ads and the results of Google Analytics.

Google and its servers used for Google analytics are located in the United States, therefore, the use of Google Ads involves the transfer of personal data outside the EU to the United States. Currently, the United States is not considered to be a country where adequate level of protection is guaranteed for the processing of personal data according to the GDPR. Therefore, when using Google Ads, contractual safeguards are in place to ensure appropriate level of protection. These are the so called Standard Contractual Clauses adopted by the European Commission and provided to us by Google, available here: Google Data Transfer Agreement, <https://policies.google.com/privacy/frameworks?hl=en-US>

Google acts as a data processor when using Google Ads. Google's contact details are:

- **Address:** 1600 Amphitheatre Parkway in Mountain View, California, United States
- **Contact for privacy issues:** Privacy Inquiry form, [https://support.google.com/policies/contact/general\\_privacy\\_form](https://support.google.com/policies/contact/general_privacy_form)
- **Privacy Policy** (also regarding YouTube): <https://policies.google.com/privacy?hl=en-US>

## Amazon Advertising

Amazon Advertising, provided by Amazon is an online advertising platform, where advertisers bid to display brief advertisements, service offerings, product listings, or videos to web users. Amazon Advertisement allows advertisers reach consumers through product ads or videos on third party websites.

Amazon acts as an independent data controller when using Amazon Advertising. Amazon's contact details are:

- **Address:** 440 Terry Avenue North Seattle, WA 98109 USA
- **Contact for privacy issues:** [ad-feedback@amazon.de](mailto:ad-feedback@amazon.de)
- **Privacy Policy:** <https://www.amazon.de/adprefs>

## Cookie summary table

Cookie name	Cookie type	Cookie period	storage	First party or Third Party
CONSENT	Analytics	2 years		Third-party, YouTube
_ga	Analytics	2 years		Third-party, Google
_gid	Analytics	1 day		Third-party, Google
_gat	Targeting and advertising	1 minute		Third-party, Google
_hjFirstSeen	Analytics	30 minutes		First Party
_hjAbsoluteSessionInProgress	Analytics	30 minutes		First Party
_hjSessionUser_698203	Analytics	1 year		First Party
_hjSession_698203	Analytics	30 minutes		First Party
VISITOR_INFO1_LIVE	Targeting and advertising	5 months 27 days		Third-party, YouTube
YSC	Targeting and advertising	session		Third-party, YouTube

## How can you control your cookie choices?

You can always change your cookie settings and withdraw your consent. Please note that when you withdraw your consent, we will not place any cookies requiring user consent on your device, but this does not affect the lawfulness of the data processing that occurred before the withdrawal of consent. When you withdraw your consent to personalisation cookies, it does not mean, that you will see less advertisement, only that the advertisement you see might not be tailored to your interest.

Further, you can restrict, remove, or block cookies through your browser settings at any time. Through the browser preferences, it is also possible to delete cookies installed in the past, including the cookies that might possibly have saved the consent for the installation of cookies by this website. It is important to note that by disabling all cookies, the functioning of our websites may be compromised. You can find information about how to manage cookies in the browser at the following addresses: [Google Chrome](#), [Mozilla Firefox](#), [Apple Safari](#) and [Microsoft Windows Explorer](#).

In addition to the above, allow us to draw your attention to the service you may want to take advantage of: [Your Online Choices](#). This service allows you to select your tracking preferences for most of the advertising tools.

## **Data Controller**

**Company name: Feilo Sylvania International Group Kft.** (22 Népfürdő utca Duna Tower, 1138 Budapest, Hungary).

**Contact email:** [compliancemanager@sylvania-lighting.com](mailto:compliancemanager@sylvania-lighting.com)