

Centra Platform Privacy Policy

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CHAPTER 1: TERMINOLOGY

Capitalized terms shall have the meanings set out below, or if not defined herein, the meanings set forth elsewhere in the Agreement.

Agreement - the Order Form, the Centra General Terms and Conditions, the Centra Platform Privacy Policy and any appendix hereto

Centra Platform – the entire collection of Centra software applications, infrastructure, database, supporting services, and components that are used to deliver a cloud-based service to Data Controller and Data Subjects

Centra Platform Data Processing Agreement (“DPA”) - a legally binding contract between a Data Controller and Centra (Data Processor) that outlines the terms and conditions under which the processor will handle personal data on behalf of the controller

Centra Platform Privacy Policy – a document that explains how Centra collects, uses, stores, and protects personal data, while informing users about their rights and the measures taken to ensure data privacy and compliance with applicable privacy regulations

Centra General Terms and Conditions – version of the Centra General Terms and Conditions and/or any later version published by Centra and distributed by Centra Platform

Centra Platform List of Personal Data Categories – a list of different types of personal information that can be collected and processed within Centra Platform

Centra Platform Sub-processors List – a list of Sub-processors engaged in the processing of personal data from/on Centra Platform.

Consent - the freely given, specific, informed, and unambiguous indication of the data subject's agreement to the processing of their personal data

Data Controller - the organization (our client) that determines the purposes and means of processing personal data listed in the Centra Platform List of Personal Data Categories.

Data Processor - means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Data Controller

Data Subject - any identified or identifiable natural person whose personal data is collected, stored, or processed

Frontend System – the software application, developed by our client, implementing a user interface that allows a natural person to place an order that is processed then on Centra Platform.

GDPR - the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and the Council as amended, supplemented and/or varied from time to time)

GDPR Legislation - (i) the GDPR, and (ii) any applicable supplementary legislation to the GDPR

Personal Data - means any information relating to an identified or identifiable natural person ('data subject');

Privacy Regulation - a legal framework established by a country or region to govern how personal data must be collected, processed, stored, and protected to ensure individuals' rights are respected and their information remains secure, such as GDPR in the European Union or the Data Protection Act 2018 in the United Kingdom.

Standard Contractual Clauses - GDPR-derived legal tools, including (EU) 2016/679, approved by the European Commission used to ensure adequate protection for personal data

Sub-processors – third party Data Processors, selected by Centra, to process Personal Data on Centra Platform on behalf of Data Controller

CHAPTER 2: PRIVACY POLICY

1. Introduction

Welcome to Centra and Centra Platform! We respect your privacy and are committed to protecting your personal data. This privacy policy explains how we collect, use, and protect your personal information when you use our Centra Platform, which supports fashion brands in managing their business operations. This policy applies to brand employees, direct consumers and other Centra Platform users.

2. Data Processor and Data Controller

A fashion brand ("our client") that uses Centra Platform is the data controller of your personal data processed on our platform. You are informed about Data Controller details and its privacy setup by either Frontend System or by Centra Platform when you log in to our platform directly. For any inquiries regarding data protection, you should first reach the Data Controller using its contact information.

Centra Technology AB ("Centra", "we", "us", "our") acts as the data processor for personal data processed on our platform. Our clients, the fashion brands that use our platform, are the data controllers for your personal data. Our registered office is located at Torsgatan 26, 113 21 Stockholm, Sweden. For any inquiries regarding data protection, you can reach us at privacy@centra.com.

3. Information We Process

We may process different categories of personal data depending on how you interact with Centra Platform.

To transparently inform you what personal data we process within Centra Platform we described them in the Centra Platform List of Personal Data Categories document. For each of the listed categories you can find the following information:

- Detailed scope of data processed
- Purpose of data processing
- Grounds for processing

- Category processing period
- Your rights under GDPR and other privacy regulations

This information may vary from category to category so please read it carefully.

4. Purpose and Legal Basis for Processing

We process your personal data as instructed by the Data Controller (our client) for the purposes defined separately for each of the data categories listed in the Centra Platform List of Personal Data Categories.

We can summarize these purposes as:

- Providing Our Services: To facilitate access to Centra Platform, including different user accounts setup and maintenance.
- Customer Support: To respond to support inquiries and provide assistance.
- Improvement of Services: To improve our platform through feedback and usage analysis.
- Legal Compliance: To comply with legal and regulatory requirements.

Please, refer to the Centra Platform List of Personal Data Categories for detailed explanation of legal basis for processing of your personal data. Some of your individual rights derived from Privacy Regulations may depend on the base for processing.

5. Sharing of Your Personal Data

We may share your personal data with trusted Sub-suppliers, including:

- Service Providers: For service provision, hosting, analytics, and customer support services.
- Business Partners: Where applicable, to share information with our partnered fashion brands to fulfill services you have subscribed to.
- Legal Authorities: If required to comply with legal obligations or government requests.

All parties receiving personal data are subject to data protection obligations in accordance with GDPR and other relevant Privacy Regulations. The detailed list of Sub-processors is presented in the Centra Platform Sub-processors List.

6. International Transfers

The Data Controller may decide where your personal data is stored and processed. By default our data centers are located in the EU.

Where your data is transferred from Centra Platform outside the European Economic Area (EEA), we use appropriate safeguards such as listed in Standard Contractual Clauses to ensure that your data is adequately protected.

7. Data Retention

We minimize the time your personal data is processed within the Centra Platform. The default processing periods for all data categories are specified in the Centra Platform List of Personal Data Categories. Data Controllers can customize these processing periods to their needs. After such a period, your personal data will be either securely deleted or anonymized.

8. Your Rights

As Data Subject, you have several rights regarding your personal data under the relevant Privacy Regulation:

1. Right to be informed: You should be transparently informed about all details regarding processing your personal data - that is what we fulfill via this policy and the consent functionality when using Centra Platform. The Data Controller fulfills this requirement within the Frontend System.
2. Right to Access: You can request information on the personal data we hold about you.
3. Right to Rectification: You can ask us to correct any inaccuracies.
4. Right to Object: You may object to certain data processing activities, including direct marketing.
5. Right to Erasure (Right to be forgotten): You have the right to request that your data be deleted or anonymized under certain conditions.
6. Right to Data Portability: You can receive your personal data in a structured format and transfer it to another provider.
7. Right to Restrict Processing: You can request that we limit the use of your data.
8. Right not to be subject to automated decision making: You have the right to object to any automated decision making on Centra Platform.

For more information of which of the rights are applicable for each of the personal data categories please read [Centra Platform List of Personal Data Categories](#).

Depending on how you use Centra Platform, you can execute your rights by either contacting the Data Controller or directly using functionality of Frontend System or Centra Platform.

9. Data Security

To ensure the security of your personal data, we operate under an Information Security Management System (ISMS) compliant with ISO 27001 and other relevant ISO standards.

We implement Technical and Organizational Measures (TOMs) derived from the ISMS to safeguard your personal data against unauthorized access (confidentiality), loss (availability), or alteration (integrity). TOMs are derived from both ISO 27001, ISO 27002 and concern information security, cybersecurity and privacy.

Our approach to information security is subject to independent security audits by a notified body. The technical measures are tested regularly including security penetration tests.

We also implement security measures specified in Standard Contractual Clauses (EU) 2021/914.

Our responsibility for the information security is limited only to the Centra Platform and Centra organization. The Data Controller is responsible for the overall information security starting with the Frontend System, the Centra Platform and all engaged Data Processors.

10. Changes to This Privacy Policy

We may update periodically the following documents (privacy setup) to reflect changes in our privacy practices or legal obligations.

- [Centra General Terms and Conditions](#)
- [Centra Platform Privacy Policy](#)
- [Centra Platform Data Processing Agreement](#)
- [Centra Platform List of Personal Data Categories](#)
- [Centra Platform Sub-processors List](#)

If you are a direct user of Centa Platform you will be informed about that fact during the login and your Consent for the new privacy setup will be required to continue using our platform. If you do not agree with the new privacy setup you should stop using Centra Platform and execute your rights described in GDPR.

Changes to the Data Controller's privacy setup are managed outside of Centra Platform.

11. Contact Us

If you have questions or concerns regarding this privacy policy or your data rights, please contact us at:

Address:

Centra Technology AB
Torsgatan 26, 113 21, Stockholm

Website:

centra.com

Email:

privacy@centra.com

Thank you for using Centra! We value your trust and prioritize keeping your data secure.