

PRIVACY POLICY

Company: SIA **STEAM SPIRIT**
Registration No.: 40203637978
Email: hello@steamspirit.eu
Website: www.steamspirit.eu
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WHO WE ARE

SIA STEAM SPIRIT is the Data Controller of the personal data processed in connection with our website, online store and related services.

This **Privacy Policy** explains what personal data we collect, why we process it, how long we retain it, with whom it may be shared, and your rights under European Union data protection legislation.

We are committed to protecting the confidentiality, integrity and security of your personal data in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and the applicable laws of the Republic of Latvia.

This **Privacy Policy** applies to all individuals who use our website, purchase our products or services, contact us, or otherwise provide us with their personal data.

By using our website or providing us with your personal data, you acknowledge that you have read and understood this **Privacy Policy**.

Data Controller

Company

SIA STEAM SPIRIT

Registration No.

40203637978

Registered Address

Ropaži Municipality, Stopiņi Parish, Dreiliņi, Vasaras iela 9–3, LV-2130, Latvia

Email

hello@steamspirit.eu

Website

www.steamspirit.eu

Contact Regarding Personal Data

To ensure efficient handling of your request, please provide sufficient information to enable us to identify your enquiry. Where necessary, we may request additional information to verify your identity before disclosing personal data or fulfilling any other data subject rights.

Supervisory Authority

If you believe that your personal data has been processed in violation of applicable data protection legislation, you have the right to lodge a complaint with the Latvian Data State Inspectorate or another competent supervisory authority within the European Union.

1. SCOPE OF THIS PRIVACY POLICY

This **Privacy Policy** applies to all personal data processing activities carried out by **SIA STEAM SPIRIT** in connection with its products, services and digital solutions.

This **Privacy Policy** applies to personal data collected through our website, online store, email and telephone communications, social media platforms, events, and any other communication channels through which you interact with **STEAM SPIRIT**.

It also applies to personal data processed before entering into a contract, during contract performance, throughout the warranty period, and as part of our after-sales customer support services.

This **Privacy Policy** applies to all natural persons whose personal data we process, including prospective customers, customers, website visitors, suppliers, business partners and other individuals who communicate with **STEAM SPIRIT**.

Services Covered

- This **Privacy Policy** applies to the following **STEAM SPIRIT** services:
- Use of the website
- Online store
- Requests for quotations and pricing
- Sale of modular saunas
- Product configuration

- Delivery arrangements
- Warranty services
- Customer support
- Newsletters and marketing communications (where consent has been provided)

Third-Party Services

Our website may contain links to third-party websites or services. **STEAM SPIRIT** is not responsible for the privacy practices, content or personal data processing carried out by such third parties. We encourage you to review their privacy policies before providing any personal data.

2. PERSONAL DATA WE COLLECT

We collect only the personal data necessary to provide our products and services, fulfil our legal obligations, pursue our legitimate interests, or where processing is based on your consent.

Personal data may be obtained directly from you, collected automatically through our website, or received from third parties where necessary for the performance of a contract or as required by applicable law.

Categories of Personal Data

Identification data	First name, surname
Contact details	Email address, telephone number, postal address and delivery address
Company data	Company name, registration number, VAT number and contact person (where applicable)
Order data	Order details, configuration, order number and delivery information
Payment data	Payment method, payment status and transaction identifiers (STEAM SPIRIT does not store full payment card details)
Communication data	Emails, telephone conversations, enquiries, feedback and other communications
Warranty data	Warranty claims, service history and after-sales communications
Marketing data	Consents, newsletter subscriptions and communication preferences
Technical data	IP address, browser type, device information and operating system
Usage data	Website visits, clicks, browsing activity and cookie-related information

How We Collect Personal Data

Directly from you when you complete a contact form, request a quotation, place an order or contact us.

Automatically through cookies and similar technologies used on our website.

From our business partners, such as payment or delivery service providers, where necessary for the performance of a contract.

From publicly available sources or official company registers where necessary to establish a business relationship with legal entities.

Data Minimisation

STEAM SPIRIT follows the principle of data minimisation and processes only the personal data necessary for the specific purpose of processing. We do not collect excessive or unrelated personal data.

3. PURPOSES OF PROCESSING PERSONAL DATA

STEAM SPIRIT processes personal data only for specific, explicit and legitimate purposes. Personal data will not be used in a manner that is incompatible with these purposes or with applicable law.

Purposes of Processing

Customer enquiry handling	To respond to enquiries, provide consultations, prepare quotations and communicate with prospective customers.
Order administration	To receive, process and fulfil orders, arrange delivery and perform contractual obligations.
Payment Administration	To process payments, issue invoices and maintain financial records.

Warranty and after-sales support	To manage warranty claims, provide service support and deliver after-sales customer care.
Contract performance	To fulfil contractual obligations arising from agreements with customers, suppliers and business partners.
Compliance with legal obligations	To comply with accounting, taxation, consumer protection and other legal obligations.
Customer support and feedback Customer support	To respond to questions, complaints, suggestions and customer feedback.
Security and fraud prevention	To protect STEAM SPIRIT systems, prevent fraud and abuse (including automated bot submissions on website forms), and safeguard the legitimate interests of the company and its customers.
Website performance improvement	To analyse website usage and improve functionality and user experience.
Marketing	To send newsletters, promotional offers and other marketing communications where the user has provided the necessary consent.
Statistics and business analytics	To perform statistical analysis, evaluate product demand and improve the company's services.

Purpose Limitation

Personal data is processed only for the purposes for which it was collected or for other compatible purposes where permitted by applicable law.

If personal data needs to be processed for a purpose not described in this **Privacy Policy**, **STEAM SPIRIT** will inform the data subject before such processing where required by applicable law.

4. LEGAL BASIS FOR PROCESSING PERSONAL DATA

STEAM SPIRIT processes personal data only where a lawful basis exists under Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and other applicable legislation.

Depending on the purpose of processing, one or more of the lawful bases described below may apply.

Lawful Bases for Processing

Contract Performance	Processing is necessary to enter into or perform a contract with you, including processing orders, arranging delivery and providing warranty services.
Compliance with Legal Obligations	Processing is necessary to comply with legal obligations, including accounting, taxation, consumer protection and product safety requirements.
Legitimate Interests	Processing may be necessary for the legitimate interests of STEAM SPIRIT , such as ensuring information security, preventing fraud, improving services or establishing, exercising or defending legal claims, provided such interests are not overridden by your fundamental rights and freedoms.
Consent	In certain situations we process personal data based on your freely given, specific, informed and unambiguous consent, for example when sending marketing communications or using cookies where consent is required.

Withdrawal of Consent

Where processing is based on your consent, you have the right to withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

Automated Decision-Making and Profiling

STEAM SPIRIT may use automated processing or profiling to personalise marketing communications and improve the user experience. Such processing does not produce legal effects concerning you or similarly significant effects.

5. SHARING PERSONAL DATA WITH THIRD PARTIES

STEAM SPIRIT does not sell or rent your personal data to third parties. Personal data is disclosed only where necessary for the provision of our services, compliance with legal obligations, or for the legitimate purposes described in this **Privacy Policy**.

Categories of Personal Data Recipients

Payment service providers	For processing payments and financial transactions.
Delivery and logistics providers	For order fulfilment and delivery notifications.
IT infrastructure and cloud service providers	For hosting, storage and operation of our systems.
Marketing and analytics providers	For website analytics and marketing activities where permitted.
Personal advisers	Legal, financial, tax and other professional advisers where necessary for business operations or legal claims.
Government authorities or supervisory bodies	Where disclosure is required by applicable law or by a competent authority.
Security and bot-prevention providers	For detecting and blocking automated/malicious form submissions to protect website functionality and prevent abuse.

Current Service Providers

STEAM SPIRIT may use service providers such as:

Service	Examples
Payments	Stripe Payments Europe, Limited
Delivery	DPD, Omniva, DHL, FedEx, QWQER
Hosting	Google Cloud or Siteground
Analytics	Google
Marketing	Meta (Facebook), SMS Solutions, email
Digital marketing	Imarketing Ltd
Security / Bot Protection	Cloudflare, Inc. (Turnstile)

STEAM SPIRIT reserves the right to replace or appoint additional service providers where necessary for its business operations. An up-to-date list of service providers is available upon request.

Protection of Shared Personal Data

Each recipient is authorised to process personal data only to the extent necessary to provide the relevant service or comply with applicable legal obligations.

Where a third party acts as our data processor, we ensure that processing is governed by an appropriate written data processing agreement and complies with the GDPR.

Business Transfers

If **STEAM SPIRIT** undergoes a merger, acquisition, reorganisation or transfer of all or part of its business, personal data may be transferred to the relevant successor entity in accordance with applicable data protection legislation.

6. TRANSFERS OF PERSONAL DATA OUTSIDE THE EUROPEAN UNION AND THE EUROPEAN ECONOMIC AREA

STEAM SPIRIT strives to ensure that all personal data is processed within the European Union (EU) or the European Economic Area (EEA). However, in certain circumstances, personal data may be transferred to or accessed by service providers located outside the EU or EEA.

When May International Transfers Occur?

Personal data may be transferred outside the EU or EEA only where necessary to provide a specific service or where the relevant service provider uses infrastructure located outside the EU or EEA.

Such transfers may occur when using cloud hosting services, analytics platforms, marketing tools or communication services.

Safeguards for International Transfers

Where personal data is transferred outside the EU or EEA, **STEAM SPIRIT** ensures that such transfers take place only in accordance with the GDPR and applicable data protection legislation.

Depending on the circumstances, one or more of the following safeguards may be used.

Transfer Safeguards

European Commission Adequacy Decision.

European Commission Standard Contractual Clauses (SCCs).

Other safeguards permitted under Chapter V of the GDPR, where applicable.

Additional Information

If you would like additional information regarding international transfers of personal data or the safeguards applied, you may contact **STEAM SPIRIT** using the contact details provided in this **Privacy Policy**.

7. RETENTION OF PERSONAL DATA

STEAM SPIRIT retains personal data only for as long as necessary to fulfil the relevant processing purpose, perform a contract, comply with legal obligations or protect our legitimate interests. Once the applicable retention period has expired, personal data is securely deleted, anonymised or destroyed unless a longer retention period is required by law.

Category of Personal Data	Retention of Personal Data
Contact Form and Enquiry Data	Up to 24 months after the last communication where no contract is concluded.
Quotations and Cost Estimate Data	Up to 24 months after a quotation is issued where no contract is concluded.
Customer and Order Data	For the duration of the contractual relationship and thereafter as required by law or for the establishment, exercise or defence of legal claims.
Accounting and Financial Documents	As required under applicable accounting and tax legislation.
Warranty and Service Documentation	Throughout the warranty period and thereafter where necessary to protect legal claims.
Marketing data	Until consent is withdrawn or the data is no longer required for the relevant purpose.
Cookie data	According to the lifespan of the relevant cookies and the Digital Privacy & Cookie Policy .
System Security Logs	For as long as necessary to ensure system security and investigate security incidents.

Extension of Retention Periods

In certain circumstances, personal data may be retained for a longer period where necessary for the establishment, exercise or defence of legal claims, dispute resolution, compliance with legal obligations or requests from competent public authorities.

Deletion of Personal Data

Upon expiry of the applicable retention period, **STEAM SPIRIT** implements appropriate technical and organisational measures to ensure that personal data is permanently deleted, anonymised or securely destroyed unless continued retention is required by law.

8. COOKIES AND SIMILAR TECHNOLOGIES

STEAM SPIRIT uses cookies and similar technologies to ensure the proper functioning of its website, improve user experience, analyse website usage and, where you have provided consent, deliver personalised content and marketing activities.

What Are Cookies?

Cookies are small text files stored on your device when you visit our website. They help remember your preferences, improve website functionality and enhance security.

Categories of Cookies

Cookie Type	
Strictly Necessary Cookies	Essential cookies enable the core functionality of the website and are required for it to operate properly.
Functional Cookies	Functional cookies remember your preferences and improve your browsing experience.
Analytics Cookies	Analytics cookies help us understand how visitors use the website and improve its performance.
Marketing Cookies	Marketing cookies are used to provide personalised content and advertising where you have given your consent.

Third-Party Cookies

STEAM SPIRIT may use third-party services such as analytics, social media or advertising platforms that use cookies. The processing of personal data by these providers is governed by their own privacy policies.

Managing Cookies

You may manage or withdraw your consent for cookies at any time through our cookie management tool or by changing your browser settings.

Please note that essential cookies cannot be disabled, as they are required for the secure and proper operation of the website.

Additional Information

Detailed information about the cookies we use, their retention periods and purposes is available in the **Digital Privacy & Cookie Policy** or through the cookie management tool available on our website.

9. YOUR RIGHTS AS A DATA SUBJECT

Under the General Data Protection Regulation (GDPR), you have a number of rights regarding the processing of your personal data. **STEAM SPIRIT** is committed to respecting these rights and enabling you to exercise them in accordance with applicable law.

Type of Right

Right of Access	You have the right to obtain confirmation as to whether we process your personal data and to request a copy of that data.
Right to Rectification	You may request the correction of inaccurate or incomplete personal data.
Right to Erasure	You may request the deletion of your personal data where there is a lawful basis for doing so under the GDPR.
Right to Restriction of Processing	In certain circumstances, you may request that the processing of your personal data be restricted.
Right to Data Portability	You have the right to receive your personal data in a structured, commonly used and machine-readable format or request its transfer to another controller where technically feasible.
Right to Object	You have the right to object to processing based on our legitimate interests, including processing for direct marketing purposes.
Right to Withdraw Consent	Where processing is based on your consent, you may withdraw that consent at any time.
Right Not to Be Subject to Automated Decision-Making	You have the right not to be subject to a decision based solely on automated processing, including profiling, where such a decision produces legal or similarly significant effects.

How to Exercise Your Rights

To exercise your rights, please contact **STEAM SPIRIT** using the contact details provided in this Privacy Policy. We may request additional information to verify your identity before responding to your request.

STEAM SPIRIT will respond to your request without undue delay and, where possible, within one month of receipt. In complex cases, this period may be extended by up to two additional months, and you will be informed accordingly.

Right to Lodge a Complaint

If you believe that **STEAM SPIRIT**'s processing of your personal data does not comply with applicable data protection legislation, you have the right to lodge a complaint with the competent data protection supervisory authority or seek a judicial remedy.

Cooperation with Data Subjects

STEAM SPIRIT is committed to handling all personal data requests fairly, within a reasonable timeframe and in accordance with the GDPR. Our objective is to ensure transparent, secure and professional processing of personal data.

10. SECURITY OF PERSONAL DATA

STEAM SPIRIT implements appropriate technical and organisational security measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, access or any other unlawful processing.

Security Area	Our Security Measures
Access Control	Personal data is accessible only to authorised employees and service providers who require access to perform their duties.
Technical Safeguards	We use secure information systems, encrypted communication channels, firewalls and other technical safeguards to protect personal data.
Organisational Measures	Our personnel are informed of confidentiality requirements, and personal data is processed in accordance with internal policies and procedures.
Service Provider Assessment	We work only with service providers that maintain an appropriate level of personal data protection and comply with GDPR requirements.
Regular Review	We regularly review and, where necessary, improve our security measures to maintain an appropriate level of protection.

Personal Data Breaches

If a personal data breach occurs, **STEAM SPIRIT** will promptly assess its nature, potential impact and take appropriate measures to minimise any possible harm.

Where required by the GDPR or other applicable legislation, we will notify the competent supervisory authority and affected data subjects within the prescribed time limits.

Responsibilities of Data Subjects

You also play an important role in protecting your personal data. We encourage you to use strong passwords, keep your login credentials confidential and notify **STEAM SPIRIT** immediately if you suspect any unauthorised access to your account or personal data.

Continuous Improvement

Personal data protection is an ongoing process. **STEAM SPIRIT** regularly assesses risks, reviews its security measures and implements improvements to ensure protection against evolving cybersecurity and information security threats.

11. FINAL PROVISIONS

This **Privacy Policy** explains how **STEAM SPIRIT** processes and protects personal data in accordance with applicable data protection legislation, including Regulation (EU) 2016/679 (GDPR).

By using our website, products or services, you acknowledge that you have read this **Privacy Policy**.

Changes to this Privacy Policy

STEAM SPIRIT reserves the right to amend or update this **Privacy Policy** at any time to ensure compliance with legal requirements, changes to business operations or technological developments.

Where changes materially affect your rights or the way your personal data is processed, we will provide appropriate notice through our website or other suitable communication channels where required by applicable law.

The most recent version of this **Privacy Policy** will always be available on the **STEAM SPIRIT** website.

Governing Law

This **Privacy Policy** is governed by the laws of the Republic of Latvia and directly applicable European Union legislation, in particular the GDPR.

Any disputes relating to this **Privacy Policy** shall be resolved in accordance with the applicable laws before the competent courts or authorities.