

DIGITAL PRIVACY & COOKIE POLICY

Company: SIA **STEAM SPIRIT**

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1. WHO WE ARE

At SIA **STEAM SPIRIT**, we believe that trust begins with transparency. Just as we carefully select the materials and technologies used to create our products, we apply the same level of care and responsibility to protecting the digital privacy of everyone who visits our website.

This **Digital Privacy & Cookie Policy** explains how we use cookies and similar technologies on our website www.steamspirit.eu, what information they help us collect, why we use that information, and how you can manage your preferences.

Our objective is not to collect as much information as possible about our visitors. Instead, we use only those cookies and technologies that are necessary to ensure the secure operation of our website, improve its functionality, understand how it is used, and, where you have given your consent, provide more relevant content and communications.

We process information obtained through cookies in accordance with applicable European Union and Latvian legislation, including **Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR)** and other applicable legal requirements.

This Policy applies to all visitors to our website, whether you are simply browsing our content, using our product configurator, submitting an enquiry, placing an order, or otherwise interacting with **STEAM SPIRIT** through our digital services.

This **Digital Privacy & Cookie Policy** should be read together with our **Privacy Policy**, **Distance Sales Agreement**, **General Terms & Conditions of Sale**, **Payment & Billing Policy**, **Return & Refund Policy**, and any other policies published on our website.

SIA STEAM SPIRIT

Registration No.

40203637978

Registered Address

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

Email

hello@steamspirit.eu

Website

www.steamspirit.eu

If you have any questions regarding this Policy, the use of cookies, or the protection of your digital privacy, please contact us using the details provided above.

2. WHAT ARE COOKIES?

Cookies are small text files that are stored on your device, such as a computer, tablet or mobile phone, when you visit a website.

They enable a website to recognise your browser and remember certain information about your visit, such as your language preferences, consent choices or other settings. Cookies may also provide aggregated or statistical information about how a website is used, helping website owners improve functionality, performance and the overall user experience.

Cookies do not, by themselves, identify you as an individual. However, in certain circumstances, information collected through cookies may be considered personal data if it can be linked, directly or indirectly, to an identified or identifiable individual. Where this is the case, such information is processed in accordance with our **Privacy Policy** and applicable data protection legislation.

STEAM SPIRIT uses cookies and similar technologies only where they serve a legitimate and clearly defined purpose. These purposes include ensuring the secure operation of our website, improving its functionality, analysing website performance and, where you have provided your consent, delivering more relevant content and communications.

We do not use cookies to collect more information than is necessary for these purposes, nor do we use them in a manner that is inconsistent with applicable legal requirements or our commitment to protecting your privacy.

How Cookies Work

Depending on their purpose, cookies may remain active only for the duration of your browsing session or be stored on your device for a longer period until they expire or are deleted.

Some cookies are placed directly by the **STEAM SPIRIT** website, while others may be set by carefully selected third-party service providers that support services such as secure payment processing, website analytics or other website functionality. More information about these services is provided in the following sections of this Policy.

3. OUR APPROACH TO THE USE OF COOKIES

At **STEAM SPIRIT**, we believe that technology should enhance your experience without compromising your privacy. We are committed to using cookies responsibly, transparently and only where they provide a clear benefit to you or are necessary for the operation of our website.

When developing and maintaining our digital services, we are guided by the following principles:

Security

We use cookies to help maintain the security and stability of our website, protect it against misuse, support fraud prevention measures and ensure the secure operation of user sessions where required.

Functionality

Cookies enable essential website features and help remember your preferences, such as language selection, cookie consent choices and other settings that improve your browsing experience.

Continuous Improvement

Subject to your consent where required, we may use cookies to better understand how visitors interact with our website. The information collected helps us improve website performance, navigation, content and overall usability, allowing us to continuously enhance our digital services.

Relevant Communication

Where you have provided your consent, cookies may be used to deliver content, information and marketing communications that are more relevant to your interests. We do not use cookies to create excessive or intrusive user profiles, nor do we engage in profiling beyond what is necessary for the purposes described in this Policy.

Transparency and Choice

We believe that you should always understand how cookies are used and remain in control of your preferences. Except for cookies that are strictly necessary for the operation of our website, you may accept, reject or modify your cookie preferences at any time through the cookie settings available on our website.

STEAM SPIRIT regularly reviews the cookies and third-party technologies used on our website to ensure that they remain necessary, proportionate and aligned with applicable legal requirements, our business needs and our commitment to protecting your privacy.

4. TYPES OF COOKIES WE USE

STEAM SPIRIT uses different types of cookies and similar technologies to ensure the secure operation of our website, improve the user experience and, where you have provided your consent, analyse website usage or provide personalised content.

Depending on their purpose, storage period and origin, cookies may be divided into several categories.

4.1. Cookies by Storage Period

Session Cookies

Session cookies operate only during your browsing session. They are created when you open our website and are automatically deleted when you close your browser.

These cookies are necessary to ensure the continuous operation of the website, maintain your selected settings during a single session and support the proper functioning of various website features.

Persistent Cookies

Persistent cookies remain stored on your device after your browser has been closed. They enable our website to remember your preferences and settings during future visits, such as your selected language or previously provided consent choices.

The storage period of each persistent cookie may vary depending on its purpose and the service with which it is associated.

4.2. Cookies by Origin

First-Party Cookies

First-party cookies are placed by the **STEAM SPIRIT** website or by authorised service providers acting on our behalf.

These cookies primarily ensure the basic functionality of the website, help maintain active user sessions, store your selected preferences and improve the operation of the website.

Third-Party Cookies

Certain features of our website are provided through trusted third-party service providers. These providers may use their own cookies or similar technologies.

Third-party cookies may be used, for example, for:

- collecting website usage statistics;
- analysing website performance;
- processing online payments;
- displaying video content;
- enabling interactive maps or other digital services;
- evaluating the effectiveness of marketing and advertising activities.

Each third-party service provider processes personal data and information collected through cookies in accordance with its own **privacy policy** and applicable legal requirements. While **STEAM SPIRIT** carefully selects its service providers, we do not control their independent data processing activities.

4.3. Cookies by Purpose

To provide greater transparency and a clear understanding of how cookies are used, we classify them into four main categories.

Strictly Necessary Cookies

These cookies are essential for the operation of our website. They enable core functions such as page loading, maintaining secure sessions, accessing protected areas of the website and supporting website security mechanisms.

Without these cookies, the website cannot function properly. Therefore, their use does not require user consent where permitted by applicable law.

Functionality Cookies

These cookies allow the website to remember your choices and provide a more personalised browsing experience. For example, they may store your preferred language, cookie consent settings or other user preferences.

Analytics and Statistics Cookies

These cookies help us understand how our website is used. They collect statistical and aggregated information about website visits, the most frequently viewed pages, user navigation and other performance indicators.

The information collected is used solely to improve the quality, performance and user experience of our website.

Marketing Cookies

Subject to your consent, we may use marketing cookies to provide more relevant information about **STEAM SPIRIT** products and services, evaluate the effectiveness of marketing campaigns and improve our communication across digital platforms.

STEAM SPIRIT does not create excessive user profiles and does not use marketing cookies without your prior consent.

5. MANAGING COOKIES AND YOUR CHOICES

STEAM SPIRIT respects your right to decide how cookies are used on your device, except for those that are strictly necessary to ensure the proper operation of our website.

When you visit our website for the first time, you will be presented with a **Cookie Banner**, allowing you to choose the level of cookie usage that best reflects your preferences.

5.1. Your Choices

Through the Cookie Banner, you may choose one of the following options:

Accept All Cookies

You consent to the use of all categories of cookies described in this Policy, including analytics, functionality and marketing cookies.

Reject Non-Essential Cookies

Only cookies that are strictly necessary for the operation of the website and that do not require consent under applicable legislation will be used.

Customise Preferences

You may individually select the categories of cookies that you wish to accept or reject.

5.2. Changing or Withdrawing Your Consent

You may change or withdraw your previously given consent at any time.

This can be done through the "Cookie Settings" option available on our website or by deleting cookies through your browser settings.

The withdrawal of consent does not affect the lawfulness of any processing carried out before the consent was withdrawn.

5.3. Browser Settings

Most internet browsers allow users to manage, restrict or delete cookies.

You may:

- delete cookies that have already been stored;
- block the storage of new cookies;
- receive a notification before a cookie is stored;
- disable the use of cookies entirely.

Please note that restricting or deleting cookies may affect the functionality of certain features of our website. As a result, some services or functions may become unavailable or may not operate as intended.

5.4. Cookie List

An up-to-date list of the cookies used on our website, including their categories, purposes, retention periods and, where applicable, the relevant service providers, is available through our **Cookie Banner** or **Cookie Settings**.

This list is maintained and updated in accordance with the current configuration of our website to ensure that it accurately reflects the cookies that are actually in use.

6. DIGITAL SERVICES WE USE

To ensure the secure, reliable and efficient operation of our website, **STEAM SPIRIT** uses selected trusted third-party digital services. Depending on their functionality, these services may use cookies or similar technologies.

We carefully select service providers that maintain high standards of security and process personal data in accordance with applicable European Union data protection legislation.

The principal digital services that may be used to support the operation of our website are listed below.

Shopify

Shopify provides the e-commerce platform for the **STEAM SPIRIT** online store, including the product catalogue, shopping cart, order processing and other essential e-commerce functions.

To deliver these services, Shopify uses technically necessary cookies and, where applicable, other cookies in accordance with your selected cookie preferences.

Further information is available in Shopify's **Privacy Policy** and Cookie Policy.

Stripe Payments Europe, Limited

Online payments made through the **STEAM SPIRIT** online store are processed by Stripe Payments Europe, Limited.

Stripe may use cookies or similar technologies to ensure payment security, prevent fraudulent transactions and facilitate payment processing.

Further information is available in Stripe's **Privacy Policy** and other applicable Stripe documentation.

Google Analytics

Subject to your consent, we may use Google Analytics to obtain aggregated statistical information about the use of our website.

This information helps us understand which pages are most frequently visited, how users navigate our website and how we can improve its performance and user experience.

Google Analytics is not activated until you have provided the required consent.

Google Tag Manager

Google Tag Manager enables us to manage analytics and marketing tools used on our website.

By itself, Google Tag Manager does not create user profiles but facilitates the proper operation of other services in accordance with your selected cookie preferences.

Meta Pixel

Subject to your consent, **STEAM SPIRIT** may use Meta Pixel to measure the effectiveness of advertising campaigns and to provide more relevant information across Meta platforms.

Meta Pixel is activated only after you have consented to the use of marketing cookies.

YouTube

Certain sections of our website may include embedded YouTube videos.

The playback of these videos may involve the use of cookies or similar technologies in accordance with YouTube's and Google's applicable policies.

Google Maps

Where interactive maps are available on our website, they are provided through Google Maps.

Google Maps may use technically necessary cookies and similar technologies to ensure the proper functioning of this service.

Other Services

As our digital services continue to develop, we may engage additional trusted service providers where necessary to improve website functionality, enhance security or further improve the quality of our customer services.

Where the use of such services requires your consent, it will be obtained before the relevant cookies or similar technologies are used.

7. PERSONAL DATA, SECURITY AND DATA PROCESSING

STEAM SPIRIT is committed to ensuring that information collected through cookies and similar technologies is processed securely, responsibly and only to the extent necessary to achieve the purposes set out in this Policy.

In certain circumstances, information collected through cookies may be considered personal data if it can be directly or indirectly linked to an identified or identifiable natural person. In such cases, the processing of personal data is carried out in accordance with the **STEAM SPIRIT Privacy Policy, Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR)** and other applicable legislation.

We apply the principle of data minimisation and process only the information that is necessary for:

- ensuring the operation of our website;
- improving the quality of our services;
- implementing security and fraud prevention measures;
- complying with our legal obligations;
- other purposes for which you have provided your consent.

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

Where the use of cookies involves our business partners or third-party service providers, we work only with partners that provide an appropriate level of personal data protection and process personal data in accordance with applicable data protection legislation.

Further information on how **STEAM SPIRIT** processes personal data, including the legal basis for processing, data retention periods and your rights as a data subject, is available in our **Privacy Policy**.

8. INTERNATIONAL DATA PROCESSING

To ensure the operation of our website and certain digital services, **STEAM SPIRIT** may engage international service providers whose infrastructure or data processing facilities are located outside Latvia or the European Economic Area (EEA). Such services may include, for example, the e-commerce platform, payment processing solutions, website analytics tools, cloud-based services or other digital solutions required for the operation of our website and online store.

Where the use of cookies or other digital services involves the transfer of personal data outside the European Economic Area, **STEAM SPIRIT** ensures that such transfers are carried out only in accordance with applicable data protection legislation and by applying appropriate safeguards.

Depending on the relevant service provider, these safeguards may include:

- an adequacy decision adopted by the European Commission;
- the European Commission's Standard Contractual Clauses (SCCs); or
- other transfer mechanisms recognised under applicable European Union data protection legislation.

STEAM SPIRIT regularly reviews its cooperation with digital service providers to ensure that personal data is processed securely, responsibly and in compliance with applicable legal requirements.

Further information regarding the processing of personal data by individual service providers is available in their respective Privacy Policies and data protection documentation.

9. CHANGES TO THIS DIGITAL PRIVACY & COOKIE POLICY

STEAM SPIRIT regularly reviews this **Digital Privacy & Cookie Policy** to ensure that it remains consistent with applicable legislation, the technologies we use and the ongoing development of our digital services.

Where necessary, we may amend or update this Policy. The most recent version will always be available on our website at www.steamspirit.eu, and the effective date of the current version will be indicated at the beginning of this document.

If any changes materially affect the way cookies are used or your rights in relation to the processing of personal data, we will notify you in an appropriate manner, for example by publishing a notice on our website or, where required by applicable legislation, by requesting your renewed consent.

We encourage you to review this Policy periodically to remain informed about how **STEAM SPIRIT** uses cookies and protects your digital privacy.