## **Privacy Policy**

Last updated: September 29, 2025

This Privacy Policy explains how ICE PLUNGER (a business name of Oy Rossi Ventures Ab) collects, uses, and protects your personal data. We are committed to safeguarding your privacy and complying with the General Data Protection Regulation (GDPR), Finnish law, and applicable Norwegian data protection law.

This Policy applies to all interactions with our website, webshop, community, and services.

#### 1. Data Controller

ICE PLUNGER is a business name of:

# **Oy Rossi Ventures Ab**

• Business ID: 3533901-2

• VAT number: FI35339012

• Address: Katajasaarenkatu 6 A 4, 53900 Lappeenranta, Finland

• Email: hello@iceplunger.com

• Support: iceplunger.com/support

### 2. Personal Data We Collect

We collect and process personal data that you provide to us or that is generated through your use of our services, including:

- Order data: name, address, contact details, payment information
- Account data: login details, profile information (e.g. forum accounts via WP-Foro)
- Communication data: messages via contact/support forms
- Technical data: IP address, device, browser type, log data
- Cookies & analytics data: usage behavior (with consent)

### 3. How We Use Your Data

We use your data for the following purposes and legal bases:

- To process and deliver orders (contract)
- To provide support and respond to requests (contract, legitimate interest)
- To manage community/forum participation (legitimate interest, consent)
- **To maintain website functionality** via WordPress and plugins (legitimate interest)
- **To process payments** through WooCommerce (contract, legal obligation)
- To analyze usage and improve our services (consent, legitimate interest)
- To comply with legal obligations (tax, accounting, consumer law)
- For marketing with consent (e.g. newsletters, Meta Pixel ads)

## 4. Data Sharing

We may share data with trusted service providers and partners when necessary:

- WooCommerce webshop platform and payment processing
- **WP-Foro** community and forum functions
- WordPress & plugins site operation and functionality
- **Complianz** cookie consent management
- Google Analytics site usage analytics (with consent)
- Meta Pixel advertising and performance tracking (with consent)
- Payment providers depending on your selected method
- Logistics partners for delivery and returns

All partners are required to process data in compliance with GDPR.

#### 5. International Transfers

- Our hosting and primary systems are located in the EU/EEA.
- Some providers (e.g. Google, Meta) may process data outside the EU/EEA.
- In such cases, transfers are safeguarded by Standard Contractual Clauses (SCCs) approved by the European Commission.

#### 6. Data Retention

We retain personal data only as long as necessary for the purposes stated:

- Order data: up to 6 years (legal/accounting obligations)
- Account data: until account deletion or inactivity for 2 years
- **Support messages**: up to 24 months
- Analytics data: as defined in our Cookie Policy
- Cookies: according to your consent choices

# 7. Your Rights

Under GDPR and Norwegian law, you have the right to:

- Access your data
- Correct inaccurate data
- Request erasure ("right to be forgotten")
- Restrict processing
- Data portability
- Object to processing (including marketing)
- Withdraw consent at any time

To exercise these rights, contact us via <u>iceplunger.com/support</u> or hello@iceplunger.com.

You also have the right to file a complaint with your local data protection authority.

## 8. Security

We implement appropriate technical and organizational measures to protect your data against loss, misuse, or unauthorized access.

# 9. Updates to this Policy

We may update this Privacy Policy from time to time. The latest version will always be available on our website. For **material changes**, we will provide notice on our site or via email where appropriate.

Ontact us: hello@iceplunger.com

Support: iceplunger.com/support

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