

PRIVACY POLICY

Last updated: 30 January 2026

1. Introduction

This Privacy Policy explains how LUMIFRAME, UNIPESSOAL LDA (“Lumiframe”, “we”, “us”) collects, uses, stores, and protects personal data in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and applicable Portuguese data protection laws. By using the website lumiframe.eu, you acknowledge that you have read and understood this Privacy Policy.

2. Data Controller

The data controller responsible for personal data processing is:

LUMIFRAME, UNIPESSOAL LDA

Registered address: Rua Fonte São Sebastião, nº 6, R/C Drt, 2670-517 Loures, Portugal

Email: compliance@lumiframe.eu

3. Data Protection Officer (DPO)

The Data Protection Officer responsible for GDPR compliance is:

Viktors Sereda

Role: Director / Data Protection Officer

Contact: compliance@lumiframe.eu

4. Personal Data We Collect

We may collect and process the following categories of personal data:

- 1) identification data (name, surname, company name);
- 2) contact data (email address);
- 3) billing and transaction data (payment confirmation, invoices);
- 4) user-submitted content (images or files uploaded for processing);
- 5) technical data (IP address, browser type, device information);
- 6) communication data (emails and support requests).

We do not knowingly collect data from persons under the age of 18.

5. Purposes of Data Processing

Personal data is processed for the following purposes:

- 1) provision of digital creative services;
- 2) order processing and delivery of digital content;
- 3) billing, accounting, and tax compliance;
- 4) customer support and communication;
- 5) website security and fraud prevention;
- 6) compliance with legal and regulatory obligations.

6. Legal Basis for Processing

We process personal data based on one or more of the following legal grounds:

- 1) performance of a contract (Article 6(1)(b) GDPR);
- 2) compliance with legal obligations (Article 6(1)(c) GDPR);
- 3) legitimate interests (Article 6(1)(f) GDPR), including business operations and security;
- 4) consent, where explicitly required (Article 6(1)(a) GDPR).

7. Payment Processing

Payments are processed by independent third-party payment service providers.

Lumiframe:

- 1) does not store full payment card details;
- 2) does not act as a payment intermediary;
- 3) does not process payments on behalf of third parties.

Payment providers process data under their own privacy policies.

8. Data Sharing

We may share personal data only with:

- 1) payment service providers;
- 2) IT and hosting providers;
- 3) professional advisors (accountants, legal advisors);
- 4) public authorities, where required by law.

We do not sell or rent personal data to third parties.

9. International Data Transfers

Where data is transferred outside the European Economic Area (EEA), we ensure appropriate safeguards in accordance with GDPR, including standard contractual clauses where applicable.

10. Data Retention

Personal data is retained only for as long as necessary for the purposes stated above, including:

- 1) contractual and accounting obligations;
- 2) statutory retention periods under Portuguese law;
- 3) resolution of disputes.

11. Data Subject Rights

Under GDPR, you have the right to:

- 1) access your personal data;
- 2) request rectification or erasure;
- 3) restrict or object to processing;
- 4) data portability, where applicable;
- 5) withdraw consent at any time (where processing is based on consent).

Requests may be sent to: compliance@lumiframe.eu

12. Right to Lodge a Complaint

You have the right to lodge a complaint with the Portuguese supervisory authority:

Comissão Nacional de Proteção de Dados (CNPd)

Website: <https://www.cnpd.pt>

13. Data Security

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

14. Changes to This Policy

We reserve the right to update this Privacy Policy at any time.

The updated version will be published on the Website with a revised date.