

Privacy Policy

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1. Introduction

This **Privacy Policy** explains how **TrueShine S.à r.l.-S** ("we", "us", "our") collects, uses, stores, and protects your personal data when you use our website www.eternalflame.lu or purchase our products.

We are committed to full compliance with the **General Data Protection Regulation (GDPR)** and applicable Luxembourg data protection laws.

By using our website, you accept this **Privacy Policy**.

2. Data Controller

TrueShine S.à r.l.-S

12 rue de Luxembourg, L-7330 Heisdorf, Luxembourg

Email: info@eternalflame.lu

Phone: +352 621 170 552

3. Personal Data We Collect

We may collect the following categories of personal data:

a) Data provided during purchase or account registration

- **Name**
- **Email address**
- **Phone number**
- **Billing and shipping address**
- **Order details**
- **Payment identifiers** (we do NOT store complete bank card details)

b) Automatically collected data

- **IP address**
- **Browser type**, version, and device type
- **Pages visited** and time spent
- **Cookies and tracking technologies**

c) Communication data

- **Emails or messages** sent to customer service
- **Enquiries submitted via forms**

4. Purpose of Data Processing

We process your personal data for the following purposes:

- To **process and deliver your orders**
- To **manage your online account**
- To provide **customer service** and respond to enquiries
- To send **order confirmations and updates**
- To comply with **legal obligations** (invoicing, tax compliance)
- To improve **website performance and user experience**
- To ensure **website security** and prevent fraud or misuse

5. Legal Basis for Processing (GDPR)

Your personal data is processed on the following legal grounds:

- **Contract performance** (Art. 6(1)(b)) – to fulfill your order
- **Legal obligation** (Art. 6(1)(c)) – accounting, taxation
- **Legitimate interest** (Art. 6(1)(f)) – service improvement and security
- **Consent** (Art. 6(1)(a)) – for cookies or newsletters

6. Data Retention

We retain your data only for as long as necessary:

- **Order and invoicing data**: 10 years (Luxembourg tax law)
- **User account data**: until account deletion
- **Cookies**: according to cookie lifespan
- **Customer support messages**: typically 2 years

7. Data Sharing

We may share personal data with the following partners:

- **UNAS Online Kft.** – website hosting provider
- **Post Luxembourg** – delivery services
- **IT, analytics, and security partners**
- **Payment processors** (minimal transaction details only)
- **Authorities** when required by law

We do not sell or rent your personal data.

8. International Data Transfers

Your data is stored within the **European Union**. No international transfers occur unless **GDPR-compliant safeguards** (e.g., Standard Contractual Clauses) are in place.

9. Your Rights Under GDPR

You have the right to:

- **Access your personal data**
- **Request correction** of incorrect or incomplete data
- **Request deletion** ("right to be forgotten")
- **Restrict processing**
- **Object to processing**
- **Request data portability**
- **Withdraw consent** at any time
- **File a complaint** with the **Commission Nationale pour la Protection des Données (CNPD)** in Luxembourg

To exercise these rights, contact us at info@eternalflame.lu.

10. Data Security Measures

We use technical and organisational measures to protect your data against:

- **Loss or accidental destruction**
- **Unauthorised access**
- **Unlawful alteration**

- **Theft or misuse**

These include **encrypted communication**, restricted access, **secure servers**, and regular monitoring.

- 11. Automated Decision-Making**

We do not use **automated decision-making** or **profiling** that produces legal effects for the Customer.

- 12. Updates to This Privacy Policy**

We may revise this **Privacy Policy** to comply with legal changes or improve clarity. Updates apply only to future usage.

Last updated: November 22, 2025