

**Updated: December 12, 2022**

## **PRIVACY POLICY**

### **Informative note**

This document is the privacy policy for EASYPROMOS' clients who have created an account in our platform, in which we describe how we protect their data, how we will use their data and how they can exercise their rights regarding the information that we store.

> **If you are a promotion organizer** and you are interested in learning about our data protection policy regarding the data of the participants in your promotions, click [here](https://www.easypromosapp.com/terms-and-conditions/).  
<https://www.easypromosapp.com/terms-and-conditions/>

> **If you are a contest participant**, and you have identified yourself with a social login such as Facebook, Twitter, Instagram or Google giving permissions to the EASYPROMOS application, and are you interested in learning about our data protection policy and exercise your rights, please click [here](https://www.easypromosapp.com/privacy-policy-users-social-networks/).  
<https://www.easypromosapp.com/privacy-policy-users-social-networks/>

> **If you are a promotion organizer** and want to know how we manage the data collected from Facebook or Instagram when organizing a sweepstakes, go to point 11 of this policy to find out more.

### **1.- Which company is responsible for processing your data?**

The company responsible for processing your data is EASYPROMOS, S.L., with C.I.F. B-65576878, located at Calle Bonastruc de Porta 20, 17001 Girona, Spain.

### **2.- Why is EASYPROMOS authorized to carry out data processing?**

EASYPROMOS is authorized to carry out data processing in order to provide the services contracted by Users. Users are defined as persons who create an account on the Easypromos website in order to create and execute promotions. Hereafter named User or Administrator.

EASYPROMOS takes the protection of your privacy and personal data very seriously. This means that your information is stored securely.

In accordance with the provisions of applicable privacy regulations, EASYPROMOS informs the User of the existence of a personal data file, generated by EASYPROMOS and duly registered in the Spanish Data Protection Agency's General Registry.

### **3.- To what purpose is your personal data processed by EASYPROMOS?**

Your personal data is collected and processed by EASYPROMOS for the following purposes:

- (i) To provide our services.

(ii) To resolve any type of issue or incident that may arise with respect to the contracted services.

(iii) To send you commercial and promotional communications related to the services provided by EASYPROMOS by letter, telephone, email, SMS, MMS, fax or an equivalent means of electronic communication.

In order to carry out the actions described in sections (ii), and (iii), we inform you that EASYPROMOS may carry out profiling and data segmentation.

The acceptance of the present Data and Privacy Protection Policy supposes the express consent of the User to the treatment of the personal data provided.

However, the User can revoke consent in every commercial or promotional communication that he or she receives, at any time, by means of a notification sent to the following email address: [privacy@easypromosapp.com](mailto:privacy@easypromosapp.com) indicating the subject "data protection", or by letter to EASYPROMOS, located at Calle Bonastruc de porta 20, Planta 5, 17001 Girona, Spain.

#### **4.- To whom will EASYPROMOS disclose your data?**

We can inform you that EASYPROMOS will not share your data with any entity.

#### **5.- Data storage.**

The personal data provided will be retained by EASYPROMOS to keep Users informed about the company's services unless Users express a desire to unsubscribe from the services.

#### **6.- User rights regarding data.**

Users have the right to:

- (i) Access their personal data.
- (ii) Request the rectification of inaccurate data or, if applicable, request its deletion.
- (iii) Request limitation of the treatment of data.
- (iv) Oppose the processing of their data.
- (v) Request its portability.

Users can exercise all the above rights by writing to the following email address: [privacy@easypromosapp.com](mailto:privacy@easypromosapp.com), indicating the reason for their request.

The User can also send a request by regular mail to Easypromos S.L., C/ Bonastruc de Porta 20, 5a Planta, 17001 Girona, Spain.

If the User considers that the processing of his/her personal data is not within the regulations or that his/her rights are not being satisfactorily exercised the User may, without prejudice to any other administrative appeal or legal action, be entitled to submit a claim to a Supervisory Authority, in particular before the Member State in which he/she resides, place of work, or location of the alleged infraction. The Supervisory Authority with which the claim has been filed will inform the claimant about the course and result of the claim.

#### **7.- Data security.**

The protection of the privacy and personal data of Users is very important to EASYPROMOS. Therefore, we will do everything in our power to prevent your data from being used inappropriately. Only authorized personnel may access your data.

EASYPROMOS maintains levels of security and protection of personal data in accordance with applicable regulations and it has assembled all the technical measures at its disposal to prevent the loss, misuse, alteration, unauthorized access or theft of the data that Users have provided via the website, while acknowledging that internet security measures are not infallible.

EASYPROMOS undertakes to comply with a duty of secrecy and confidentiality with respect to your personal data in accordance with the applicable legislation, granting a secure treatment in any data transfer, national or international, that may take place.

#### **8.- Links to webpages.**

EASYPROMOS may contain links to webpages of third-party companies and entities. EASYPROMOS cannot be held responsible for the way in which these companies engage in the protection of privacy and personal data. Therefore, we advise you to read the privacy policy of these web pages – which are not owned or operated by EASYPROMOS – carefully, particularly any statements related to the use, processing and protection of personal data. The conditions provided by these web pages might not be the same as those provided by EASYPROMOS.

#### **9.- Use of the website.**

The website may provide access to a multitude of images, belonging to EASYPROMOS and to third-parties, which the User may have access to.

The access, navigation and use of the website is the responsibility of the User. Said responsibility extends to the registration necessary to access the services or contents that the website may provide.

Likewise, we urge you to communicate to EASYPROMOS via the tools provided by the website any knowledge of third-party conduct that is contrary to Law or that violates rights.

The User undertakes to use the contents and services provided by the Website in a correct and lawful manner, including, but not limited to, a commitment to abstain from:

- (i) Using the contents for purposes or effects that are contrary to Law, good faith and public order.
- (ii) Introducing or disseminating computer viruses or any other physical or logical systems likely to cause damage to the website.

#### **9.1.- Prohibited practices.**

(i) Minors under the age of 14 are not allowed to purchase products, activate promotions or use EASYPROMOS applications, unless they have the express consent of parents and/or guardians.

(ii) EASYPROMOS does not collect personal data from minors under the age of 14 without the express written consent of parents and/or guardians. This consent must be sent to EASYPROMOS at the email address [privacy@easypromos.com](mailto:privacy@easypromos.com) in order to be processed, verified and authorized.

If at any time EASYPROMOS has proof of receiving data from a minor that does not conform to current applicable law, it will cancel and eliminate said data.

#### **10.- Data hosting.**

EASYPROMOS informs you that your personal data will be hosted on servers located in the Google Data Center in Saint Ghislain, Belgium.

EASYPROMOS also informs you that it has subcontracted both the maintenance and monitoring of the EASYPROMOS infrastructure to the service provider ACKSTORM.

For more information about the services provided by Google and Ackstorm, click on the following [link](#)

#### **11.- Social Network Permissions**

For the correct provision of our service, EASYPROMOS may need to request social network permissions for Facebook, Twitter, Instagram or Google. EASYPROMOS promise to not make any use of said permissions beyond the provision of the service itself.

##### **11.1.- Facebook data of Promotion administrators**

Some of EASYPROMOS services and applications require access to Facebook data in order to manage contests, sweepstakes, and promotions managed with the Easypromos platform. EASYPROMOS acts as Data Controller of this data.

To access Facebook data, EASYPROMOS will request permission to access this data through Facebook's permissions and authorizations system. EASYPROMOS will only request the minimum necessary permits to deliver the service, EASYPROMOS will not request any additional permissions.

##### **11.1.1.- Access to EASYPROMOS platform through Facebook**

- **Data collected:** Facebook user 's email address, unique user identifier on Facebook.
- **Purpose:** It is used to access the EASYPROMOS platform without the need of introducing a password. Furthermore, if it is the first time registering, the name, last name, and email fields will be automatically filled in for a quick registration. Accessing the EASYPROMOS platform through Facebook login is optional.
- **Facebook permissions requested:**
  - *Public profile:* allows to collect the unique identifier and Facebook user name.
  - *Email:* allows to collect the Facebook user 's email. Allows quick registration.
- **Data collection and elimination:** Data will be kept until Facebook Login is disabled, the EASYPROMOS account is eliminated, or its elimination is specifically requested.

The elimination of the data collected can also be requested by following the instructions listed in point 6 of this privacy policy.

#### 11.1.2.- Applications for comment-based sweepstakes on Facebook and Instagram

- **Data collected:** List of users' comments on organic and promoted posts on a Facebook or Instagram business account. The text, user ID, and time and date of every comment will be collected. Additionally, to be able to collect the comments, it is necessary to access the list of Facebook or Instagram business accounts that the contest administrator manages, the list of posts in an account, and in the case of managing a contest based on promoted posts or ads it is necessary to access the list of advertising accounts.
- **Purpose:** The purpose is to be able to get the list of finalists of Facebook and Instagram comment-based sweepstakes. To provide the service it is necessary to store the data collected from the comments on the sweepstake's post. The list of accounts that the client manages, the list of posts, the list of advertising accounts, and the list of ads are not stored. They are only used so that the user can select the post or ads for which the comments have to be imported.
- **Facebook permissions:**
  - *pages\_show\_list*: To collect the Facebook and Instagram business accounts.
  - *pages\_read\_engagement*: To collect the posts of the Facebook and Instagram accounts.
  - *pages\_read\_user\_content*: To collect the comments on a post.
  - *instagram\_basic*: To collect the basic information of an Instagram account and its posts.
  - *instagram\_manage\_comments*: To be able to read the comments on an Instagram post.
- **Data storage and elimination:** The comments collected from a Facebook or Instagram sweepstakes will be stored for a maximum of 90 days. After 90 days, the comments are automatically eliminated. The administrator can eliminate the comments using the platform before the 90 days have gone by. The elimination of the data can also be requested by following the instructions listed in point 6 of this policy.

#### 11.1.3.- Instagram mentions monitoring service

- **Data collected:** Posts that contain a mention to an Instagram business account. For each post, the user name of the author, the time and date, and the URL of the post will be collected.
- **Purpose:** It is used in the application Mention + Hashtag to publish a gallery containing the photos that mention a brand and include the contest hashtag. The list of accounts that the client administers is only used so that the client is able to select the Instagram business account that wishes to monitor.
- **Facebook permissions:**
  - *pages\_show\_list*: To collect Facebook and Instagram business accounts.

- *pages\_read\_engagement*: To collect the posts on the Facebook and Instagram pages.
- *pages\_read\_user\_content*: To collect the comments on a post.
- *instagram\_basic*: To collect the basic information of an Instagram account and its posts.
- *pages\_manages\_metadata*: To receive the Facebook webhooks.
- **Data storage and elimination**: The contest photos obtained from Instagram will be stored until the administrator deletes the contest, deletes the contest participants, or specifically requests EASYPROMOS to delete them. They will be stored for a maximum of 5 years and 2 months. The elimination of the data can also be requested by following the instructions listed in point 6 of this policy.

#### 11.1.4.- Instagram Stories monitoring service

- **Data collected**: Direct messages between an Instagram user and an Instagram business profile that include a Story-Reply or a Story-Mention. Each direct message includes the content of the message, the @user who sent the message, and the date and time the message was made.
- **Purpose**: It is used in the Instagram Stories Giveaway. Filter the messages that include a Response to a Story (Story-Reply) or a Story with the mention of the brand (Story-Mention), to generate the list of participants of a raffle, and select random winners among them.
- **Facebook permissions**:
  - *instagram\_basic*: To collect the basic information of an Instagram account and its posts.
  - *pages\_manages\_metadata*: To receive the Facebook webhooks.
  - *pages\_manage\_messages*: To receive Instagram message webhooks, to be able to read old messages via the Conversation API, and to be able to send autoresponders via the Send API.
- **Data storage and elimination**: Stored messages from an Instagram Stories giveaway are retained for up to 90 days. After 90 days the messages are automatically deleted. The administrator can delete the comments before 90 days from the platform itself. You can also request the deletion of the data by following the instructions in point 6 of this policy.

#### 11.2.- Facebook data of the promotions' participants

The EASYPROMOS platform provides promotion administrators with the tools to enable Facebook Login as an identification and registration system for a promotion. Administrators can link their own Facebook applications

In case that the application administrator does not use their own Facebook app to carry out the Facebook Login, EASYPROMOS will provide its own applications for the Facebook Login. In this case, the privacy policy regarding how we process the data obtained from Facebook Login of Facebook users participating in the contests, is described in this [policy](#). Easypromos is not the Data Controller of this data, Easypromos is in charge of processing this data on behalf of the

promotion administrator, who is the Data Controller for the participants' data. The commitments that Easypromos assumes as Data Processor are listed in this [policy](#).

## **12.- Notifications regarding the provision of the service**

In order to improve our service, we inform you that in the event of an incident that affects your promotion, EASYPROMOS may send you communications related to this incident, in order to inform you and keep you updated at all times until the incident has been solved.

In addition, if our system detects that the promotion that you're organizing could be performing better, we may also send you communications proactively to inform you how you can improve the performance of the promotion.

## **13.- Recommendations**

Please read and follow these recommendations carefully:

- (i) The website is not aimed at minors, so we recommend activating parental control.
- (ii) Keep antivirus software installed and updated on your computer to ensure it remains free of both malicious software and spyware applications that could put at risk your internet browsing and data stored in your system.

## **14.- Questions.**

If you have any questions about this privacy policy please contact EASYPROMOS by email at [dpo@easypromosapp.com](mailto:dpo@easypromosapp.com)