

**Updated: April 18, 2018**

## **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/>

### **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.

#### **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.**



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