

PRIVACY POLICY

Last updated: May 24, 2018

PromoRepublic Oy together with its affiliated entities (“PromoRepublic”) is committed to protecting your privacy. This Privacy Policy describes how we collect, use, and share data, and what choices you have with respect to your data. We have updated this version of our Privacy Policy to reflect changes in data protection law.

We have a few fundamental principles:

- I. We are thoughtful about the personal data we ask you to provide and the personal information that we collect about you through the operation of our services.
- II. We store personal information for no longer than we really have a need to keep it or when it is required by law.
- III. We aim to make it as simple as possible for you to control what information on this website is shared publicly (or kept private), indexed by search engines, and permanently deleted.
- IV. We aim for full transparency on how we gather, use, and share your personal information.

Below is our Privacy Policy, which incorporates and clarifies these principles.

1. WHAT PERSONAL INFORMATION DOES PROMOREPUBLIC COLLECT?

We collect personal information about you in the following ways:

1.1. Information you give us

Information that you may provide through the Services or otherwise communicate with us includes:

- Personal and Business Contact information provided via registration form, such as your first name, last name, email address, telephone number, your role (such as Marketing Freelancer, Marketing Agency representative, Small Business owner/manager, etc.).
- Profile information, such as your username and password.
- Content you post on our Site (text, images, photographs, messages, comments, or any other kind of content that is not your e-mail address).
- Feedback and correspondence, such as information you provide in your responses to surveys, when you participate in market research activities, report a problem with our Site, receive customer support or otherwise correspond with us.
- Transaction information, such as details about subscription to our Services you make through the Site and billing details;
- Marketing information, such as your preferences for receiving marketing communications and details about how you engage with them.

1.2. Information from Social Networking Sites

You may choose to connect to our Services via your Facebook social media account. Exactly what information we receive from your social media will depend on your social media privacy settings, but it would typically include your basic public profile information such as:

- your username
- profile picture
- age range
- gender
- date of birth

1.3. Personal Information Collected from Connected Social Media Accounts

PromoRepublic may allow you to connect a Social Media Account page or profile like Facebook, Twitter, Instagram, LinkedIn, Vkontakte, or Odnoklassniki to your PromoRepublic account, in which

case we will access certain information from this Social Media regarding your account. In particular, we may collect profile image, display name, username / page ID or profile ID, access tokens, sent posts. This includes the content of your post and engagement data (such as click rates, likes, re-shares, impressions, as well as general engagement counts), to the extent permitted by applicable law. This data will only be used by PromoRepublic to provide you with the Service you expect and will not be shared with any third parties.

1.4. Information automatically collected

We may automatically log information about you and your computer or mobile device when you access our Site. For example, we may log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, the website you visited before browsing to our Site, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our Site as well as broad geographic location (e.g. country or city-level location) based on your IP address and GPS location where you provide your consent. We collect this information about you using cookies. Please refer to the Cookies and Similar Technologies section below for more details.

1.5. No special categories of information

We do not request or intend to collect any "special categories of information" such as any information on health, race, religion, political opinions or philosophical beliefs, sexual preferences or orientation. Kindly be cautious when sharing this information about yourself (or others).

1.6. Changes to your personal information

It is important that the personal information we hold about you is accurate and current. Please let us know if your personal information changes during your relationship with us by updating your registration profile or emailing us at privacy@promorepublic.net.

2. HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for following purposes:

2.1 To provide and operate our Services:

- To create user accounts / profiles to enable you use our Services
- To send you service related communications including confirmations, technical notices, updates, security alerts, and support / administrative messages

2.2 To improve our Services and keep them secure:

- To respond to your customer support requests (e.g. if you write to us with a complaint)
- To detecting and preventing illegal activities (e.g.hacking or cheating)
- To conduct optional user feedback surveys
- To carry out research
- To better understand your needs and interests, and personalize your experience with the Services; and
- To provide support and maintenance for the Site and our Services.

2.3 To personalise our Services:

- To remember you next time you visit our Site
- To communicate with you about promotions, upcoming events, and other news about products and services offered by us

2.4. To create aggregated or de-identified information

We may disclose or use aggregated or de-identified information for any purpose. For example, we may share aggregated or de-identified information with prospects, partners, or sponsors for business or research purposes.

2.5 For compliance, fraud prevention and safety

- To comply with our legal obligations
- To exercise, establish or defend our legal rights, or to protect your vital interests or those of any other person
- To prevent and/or detect fraud or fraudulent behaviour

2.6 Use of Credit Card Information

If you give us credit card information, we use it solely to check your financial qualifications and collect payment from you. We use a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use information you provide except for the sole purpose of credit card processing on our behalf. We will never sell your personal Information to any third party.

3. COOKIES AND SIMILAR TRACKING TECHNOLOGY IN WEBSITES

The Services may use “cookies” and other technologies such as pixel tags, local shared objects, hardware-based device identifiers, flash cookies, operating system-based identifiers, clear GIFs and web beacons.

Cookies: A “cookie” is a small file stored by your device when told to do so by a website. Typically websites place a number of different cookies on an end-user’s device. Some of the cookies are “1st party,” from the website itself, and others are “3rd party,” belonging to advertising and analytics entities or social networks. Cookies are personal information. However, PromoRepublic’s cookies do not include any other personal information and are typically used to quickly identify your device and to “remember” your device during subsequent visits for purposes of functionality, preferences, and website performance. You can disable cookies on your device or set your device to alert you when cookies are being sent to your device; however, disabling cookies may affect your ability to use the Services.

4. LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only (i) where we need the personal information to perform a contract with you, (ii) where the processing is in our legitimate interests and not overridden by your rights, or (iii) where we have your consent to do so.

- A. Performance of contract (under our terms of service) as legal basis for processing is when we make Services available to you, provide customer support, and inform you of the service related changes.
- B. We process your personal data on the basis of our legitimate interests for example when we keep our Services secure.
- C. We have Legal obligation to process your personal data when to comply with a legal obligation, such as the prevention of crime or fraud or to maintain records relating to tax.
- D. If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us at privacy@promorepublic.net.

5. WHO DOES PROMOREPUBLIC SHARE MY PERSONAL INFORMATION WITH?

We may share your personal information to the following categories of recipients:

- A. To our group companies, third party services providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Services), or who otherwise process personal information for purposes that are described in this Privacy Policy or notified to you when we collect your personal information. The list of our current Partners can be found here (<http://get.promorepublic.com/partners/>)
- B. To any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- C. To a potential or actual buyer (and its agents and advisers) in connection with any proposed or actual purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy;
- D. To any other person with your consent to the disclosure.

6. HOW DOES PROMOREPUBLIC KEEP MY PERSONAL INFORMATION SECURE?

We use appropriate technical and organisational measures designed to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. Specific measures we use include encrypting your personal information in transit and at rest. We also have security policies and data processing agreements with all our employees and contractors who are obliged to follow and maintain appropriate technical and organisational measures.

Connections to the Site are encrypted using 256-bit SSL with integrity assured by the SHA2 ECDSA algorithm. We use servers that comply with strict international data security standards, including ISO 27001.

You acknowledge that no perfect security infrastructure exists, no data transmission is guaranteed to be 100% secure, and there may be some security risks. You are responsible for your login information and password. You shall keep them confidential. In case if your privacy has been breached, please contact us immediately on privacy@promorepublic.net.

7. LOCATION OF THE PROCESSING OF PERSONAL DATA

The personal data collected by PromoRepublic is processed at the company's offices in Helsinki. Our servers for storing the data are located in Falkenstein, Germany.

8. INTERNATIONAL DATA TRANSFERS

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

Specifically, our group companies and third party service providers and partners operate around the world. This means that when we collect your personal information we may process it in any of these countries. However, we ensure appropriate safeguards are in place so that your personal information

will remain protected in accordance with this Privacy Policy. These include implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies and third party service providers and partners, which require all group companies to protect personal information they process from the EEA in accordance with European Union data protection law. It also includes transferring personal information to third party service providers and partners which are certified under the EU-US Privacy Shield.

By providing your data to us you agree to this transfers taking place.

No third party providers have access to your data, unless specifically required by law, where you have consented with us to do so, or in order to provide our Services to you.

9. DATA RETENTION

We retain personal information we collect from you where we have an ongoing legitimate business need to do so, for example, to provide you with a Service you have requested or to comply with applicable legal, tax or accounting requirements. We will for example periodically de-identify unused accounts and we regularly review and de-identify unnecessary personal information.

When we have no ongoing legitimate business need to process your personal information, we will either erase or de-identify it or, if this is not possible - for example, because your personal information has been stored in backup archives - then we will securely store your personal information and isolate it from any further processing until erasure is possible.

10. YOUR DATA PROTECTION RIGHTS

You have the following data protection rights:

- A. To access correct, update or request deletion of your personal information. You may do so either through your account settings with us or by contacting us using the details at privacy@promorepublic.net.
- B. To object to processing of your personal information (which is processed on the grounds of legitimate interests), ask us to restrict processing of your personal information or request portability of your personal information. Again you may do so by contacting us at privacy@promorepublic.net.
- C. To opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe / opt-out" link in the marketing communications we send you or by contacting us at privacy@promorepublic.net.
- D. If we are processing your personal information with your consent, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. You may do so by contacting us at privacy@promorepublic.net.
- E. You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

You can control and limit the nature of personal information that we collect and process about you in a number of ways. For example, you can disconnect your social media account from our Services or control your social media privacy settings to limit the information shared with us. You could also reset your mobile advertising identifier or limit ad tracking altogether using the settings on your phone. You could also limit or disable the use of cookies (or similar technologies).

Should you believe that any personal data we hold on you is incorrect or incomplete, you have the ability to request to see this data, rectify it or have it deleted.

We will respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

11. AGE LIMIT

Our Services are not directed to children under the age of 18, and we do not intentionally gather personal information from visitors who are under the age of 18, without their parental or guardian's consent. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at the contact information provided above. We will delete such information from our files as soon as reasonably practicable.

12. UPDATES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

13. HOW TO CONTACT US

Data controller: PromoRepublic Oy c/o Fiare Oy
Address: Tammasaarenkatu,1 00180 Helsinki, Finland.
Email: privacy@promorepublic.net