

PRIVACY POLICY

for Users of 24SevenSocial website and Platform

Last revision: October 7, 2021

1. ABOUT THIS POLICY

24SevenSocial AS (“**we**” or “**us**” or “**our**”) respects the privacy of our users (“**user**” or “**you**”). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our website 24sevensocial.com and our social presence management platform 24sevensocial available at <https://platform.24sevensocial.com> (the “**Platform**”).

This Privacy Policy is issued on the grounds of Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (**GDPR**).

Please read this Privacy Policy carefully. WHILE YOUR ACCEPTANCE OF THIS PRIVACY POLICY IS NOT REQUIRED, IF YOU DO NOT FEEL COMFORTABLE WITH OUR USING YOUR PERSONAL DATA AS DESCRIBED HEREIN, PLEASE DO NOT ACCESS OUR WEBSITE AND DO NOT SUBSCRIBE TO OR USE OUR PLATFORM.

2. ABOUT US

We are 24SevenSocial AS, a company incorporated and existing under the laws of Norway, having its registered address at Dyrmyrgata 4, NO-3611, Kongsberg, Norway, registered with the Register of Legal Entities with Norway’s Brønnøysundregistrene under number 995595397.

If you need to reach us, you can do so at our registered address mentioned above or by phone at +47 404 14 700. You can also reach us by email, as follows:

- For notifying us of personal information changes or for request for changes, access or deletion of your information, email us at info@24SevenSocial.com
- For reporting security vulnerabilities in our website or Platform or if you have any questions about this Privacy policy, email us at security@24SevenSocial.com.

If you are a data subject whose personal data we process as a data processor for one of our clients, please contact the controller of your personal data (our client) with any request you may have directly.

3. COLLECTION AND USE OF PERSONAL DATA

We collect information for two main purposes – for the purposes of the contract you may enter with us if you become a registered user of the Platform, and for analytical purposes.

Information you provide for the purpose of your contract with us

If you become a registered user of the Platform by purchasing a subscription package or signing-up for free trial use of the Platform, you enter a contract with us for the services we provide through the Platform (the “**Service**”).

In order to identify you as a client and manage our business relationship with you we will ask you to provide information, such as your name, email address, business details needed for contractual and invoicing purposes (e.g. phone company and title, business phone number), etc. We may also use that

information to respond to comments and questions and provide customer service, deliver service messages and other services and content you request and to send information related to accounts and services, including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages. We do not collect or process any payment information. For payment of your subscription you will be redirected to our payment services provider and provide your payment information to them directly.

In order to provide you the Services, we will ask you to give us access to the relevant social media account you want to manage through the Platform. Once you provide access to a social media account, we may be able to access all platform data from that social media. Note, however, that you or the entity on whose behalf you purchase a subscription to the Platform, will remain controllers of any platform data that we may be able to access on any of your social media. We will remain a data processor with regard to any such data. We will not access or process any such data other than according to your instructions (given through your input and interaction with the Platform).

Information we collect for analytical purposes

We collect information for analytical purposes from visitors of our website and from users of our Platform. The legal basis for processing of analytical information is our legitimate interest to improve our product and to optimize user's experience with our website and the Platform. Analytical information is mainly collected through the use of cookies and web beacons.

Cookies are small data files that are stored on your hard drive by a website. The information we may collect using cookies may include your computer's internet protocol (IP) address, access times, browser type and language, referring website address, your computer's operating system and information about your usage and activity on our website. We collect and process such information for analytical purposes in order to optimise our website and Platform, and improve your experience. For example, we may use the information we collect in order to:

- see which areas and features are most popular;
- count the number of computers accessing our website;
- personalize your experience on our website and Platform, and to remember your preferences;
- send you information about new promotions, products, and services offered by us our selected partners; and
- to conduct an aggregated analysis of the performance of promotions. Personal information you provide may be linked or combined with other personal information we collect or obtain from third parties. We match your information, in part, to help understand your needs and provide you with better service.

If your browser is set not to accept cookies or if you reject a cookie, you may not be able to access certain features or services of our website and Platform.

Web beacons, also known as pixels, are electronic images that may be used on our Sites or in our emails. A Web beacon may be used on our Web pages to collect information, deliver cookies, count visits, understand usage and campaign effectiveness, or in our emails to tell if an email has been opened and acted upon.

4. SHARING OF PERSONAL INFORMATION

We do not share your personal information with third parties other than as follows:

- with your consent, for example, when you agree to our sharing your information with other third party partners for their own marketing and other purposes subject to their separate privacy policies;

- with third party vendors, consultants and other service providers who are working on our behalf and need access to your information to carry out their work for us;
- to comply with laws or respond to lawful requests and legal process;
- in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. In any such event, we will provide notice if your data is transferred and becomes subject to a different privacy policy.

5. DATA STORAGE AND DATA TRANSFERS

All personal data that we control, or process is stored and backed-up inside the European Union or the European Economic Area.

We may use data processors based outside the EU/EEA for specific limited purposes (e.g. emailing providers for handling emailing campaigns). In any such case we may transfer limited personal data to any such recipient according to all applicable data transfer requirements. In the absence of an adequacy decision of the European Commission under Article 45 of GDPR, we provide for appropriate safeguards for the protection of your personal data by entering the standard data protection clauses adopted by the Commission in accordance with the examination procedure referred to in Article 93(2) (processor to processor). The standard contractual clauses are available at https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?uri=CELEX%3A32021D0914&locale=en.

6. DATA RETENTION

We will store your personal data that we process as a data controller for as long as you remain a client (maintain an active subscription) and for a period of 6 months thereafter. After that, such data will be deleted, unless the data is necessary for our compliance with applicable legal requirements or for the legal defense of our rights or legitimate interests (e.g. for a pending law suit with you or a third party).

We will store usage data collected through cookies or web beacons for up to 6 months. After that period such data will either be deleted or removed from your device. We could continue to process such data for statistical and research purposes indefinitely.

Platform data that we process for you as a data processor will be automatically deleted when you disconnect the social media account to which the data relates. If your subscription or trial period for the Platform expires, we will keep your platform data for 6 months in order to enable you to renew your subscription. You can choose to delete or have us delete such data any time before that period expires.

7. SECURITY OF YOUR PERSONAL INFORMATION

We take reasonable security measures to protect your personal information to prevent loss, misuse, unauthorized access, disclosure, alteration, and destruction. Please be aware, however, that despite our efforts, no security measures are impenetrable. If you use a password on our Platform, you are responsible for keeping it confidential. Do not share it with any other person. If you believe your password has been misused, please advise us immediately.

When payments are processed via credit or debit card, we use third-party vendors that are PCI_DSS-compliant.

8. YOUR RIGHTS AS A DATA SUBJECT

As a data subject you have certain rights with regard to your personal data that we process. While this Section contains comprehensive description of data subject rights, these rights that you have with regard to us, are limited to the personal data and the processing that we do as a data controller. Any rights that

you may have with regard to your personal data that we process as a data processor for you or for any other person or business (which is the controller of that data) are subject to the terms of our data processing agreement with such data controller.

You can exercise any of your rights (that you have with regard to us) by submitting a written request to us, in person, through an explicitly authorized proxy, or through such communication which enables us to verify your identity (e.g. through the use of qualified electronic signature). You can address any request or other communication to our addresses listed in Section 2 above.

Right to access to your personal data

You have the right to be informed by us whether we process personal data relating to you and if so, to be granted access to such data, as well as to be informed about:

- the categories of personal data concerned;
- the purposes of processing;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, more specifically the data recipients in third countries or international organizations;
- where possible, the period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of your personal data or to object to such processing;
- the right to lodge a complaint with a supervisory body;
- where the personal data is not collected from you, any available information for its source;
- the existence of automated decision-making, including profiling, as well as meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

We will provide free-of-charge copy of your personal data undergoing processing, as well as the information, specified in the foregoing paragraph, within one month of the date of filing of your request. For any further copies requested by you, we may charge a reasonable fee based on the administrative costs incurred for such additional copy.

Right to rectification

If you consider that your personal data processed by us is inaccurate, you have the right to request from us to rectify without undue delay such inaccurate data. If your data are incomplete, you have the right to have incomplete personal data completed, taking into account the purposes of processing.

Right to withhold consent

If we process your personal data based on your consent, you can withdraw your consent at any time. Following such withdrawal, we will cease the relevant processing, whereby the withdrawal of your consent will not affect the lawfulness of processing based on such consent prior to its withdrawal. Notwithstanding the above, we can continue processing the personal data concerned if another legal basis (other than consent) for the processing of such data or any of the exceptions listed in this Privacy Notice.

Right to object to processing

You have the right to object to the processing of your personal data if such processing is based on public interest or our legitimate interests if you consider that in your specific case such processing is incompatible with the protection of your interests, rights and freedoms. In such cases, if we cannot demonstrate compelling legitimate grounds for processing which override your interests, rights and freedoms or for processing that is needed for establishment, exercise and defence of legal claims, we will cease processing such data.

Right to erasure of personal data

General rule. You have the right to request from us the erasure of your personal data without undue delay and we have the obligation to erase such personal data without undue delay where one of the following applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw your consent on which the processing is based and there is no other legal ground for the processing;
- you object to the processing and we do not have any legitimate grounds for such processing, overriding your interests, rights and freedoms;
- your personal data have been processed unlawfully;
- the personal data have to be erased in order for us to comply with a legal obligation.

Exceptions from the rule. We are not obliged to erase your data and, respectively, your request for erasure of your data can be disregarded, if the relevant processing is necessary for:

- exercising the right of freedom of expression and information;
- our compliance with a legal obligation which requires processing or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us;
- reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9 (2) as well as Article 9 (3) of the GDPR;
- archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89 (1) of the GDPR in so far as the erasure of data is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- the establishment, exercise or defence of legal claims.

Right to restriction of processing

You have the right to obtain from us restriction of any other processing of your personal data, other than the storing of the data, in the cases listed below:

- when you contest the accuracy of your personal data – for a period enabling us to verify the accuracy of your personal data;
- when the processing is unlawful but you oppose the erasure of the personal data and request the restriction of their use instead;
- when we no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims;
- when you have objected to processing pending our verification whether our legitimate grounds for processing override your interests.

In any of the listed cases we can process the personal data concerned, other than their storage, only based on your consent or for the establishment, exercise, defence of legal claims or for the protection of the rights of another natural person or for reasons of important public interest for the Republic of Bulgaria or for the European Union.

Right to data portability

You have the right to receive your personal data which you have provided to us in a structured, commonly used and machine-readable format and you have the right to transmit such data to another controller without hindrance from us, where:

- we process your data based on your consent or when the processing of such data is needed for the performance of any obligation under a contract we may have with you; and

- the processing is carried out by automated means.

In exercising your right to data portability, you have the right to have the personal data transmitted directly from us to another controller, where technically feasible.

Right to lodge a complaint with the supervisory body

If you find that our processing of your personal data is in breach of any of the provisions of the applicable legislation, including but not limited, the GDPR and the Personal Data Protection Act, you have the right lodge a complaint with the supervisory body of the Member State of the European Union or Norway as per your habitual residence, place of work or place of the alleged infringement. The competent supervisory body in Norway is Datatilsynet (www.datatilsynet.no).

9. MISCELLANEOUS

We reserve the right to make changes to this Privacy Policy at any time and for any reason. If you have an account with us any material changes in the Privacy Policy will be communicated to you. You are encouraged to periodically review this Privacy Policy to stay informed of updates. We may require you to confirm an update to this Privacy Policy was communicated to you for you to continue using our Platform.

This Privacy Policy forms part of our wider Terms of Service. Both the Terms of Service and the Privacy Policy apply to your use of the Service.