

# **PRIVACY POLICY**

(Version 1.0, June 2019)

When you write a review on 'hoodHeroes or otherwise use our Website, we collect and process personal data about you. This document helps you understand what personal information we collect about you, how we collect it, what we use it for, and what rights you have regarding your personal data.

When we talk about "'hoodHeroes," "we," "us" or "our," we mean PennyWorthy IVS and our affiliates. We also use "Policy" to refer to this Privacy Policy and "Website" to refer to our applications and all of 'hoodHeroes's websites, like hoodheroes.dk, hoodhero.es, etc.

PennyWorthy IVS is the entity responsible for processing your personal data.

## **1 Personal data - what we collect and what we use it for**

### **1.1 Master data**

When you create a profile or write your first review on the Website, we will automatically generate a personal account for you on 'hoodHeroes ("Account") and collect the following personal data about you (the "Master Data"):

- Your username (this will be public)
- Your securely encrypted password, and
- Your email address.

This information is mandatory, which means that it will not be possible to write a review on the Website without it.

You can choose to add further personal data to your profile. The additional data you can add is your name, a profile description, photo, gender, city, country, and language. This additional information will be part of your public profile and will also be part of the Master Data.

'hoodHeroes is an open review platform and when we display your review we will connect it to your profile so that people can see who wrote the review. Therefore, please be aware that depending on the information you add to your profile and the username you choose, you may or may not be anonymous.

### **1.2 Information in reviews and ratings**

When you write a review about a company and post it on our Website, we collect the information you put in your review. This includes:

- Which company you review or rate
- The type of sustainability or social responsibility topic your review or rating concerns
- The headline and content of your review
- Your rating of the company sustainability or social responsibility (1-5 hearts)
- The date of your review and, if you update your review, the date on which it is edited
- A reference number or order ID (if you or the company provides one)

- If we ask you to provide information or documentation verifying your claims about company sustainability or social responsibility and you send us such documentation, we will collect and process the documentation for the purpose(s) stated in the request.

Please don't share any sensitive personal documents or information with us, either concerning yourself or others.

### 1.3 Information about views, likes and how useful your review is for others

When you write a review of a company on our Website, people can show that they find your review useful, for example by "liking it", and we collect this information. We also collect information about how many people read your review. We don't track the identities of people who aren't logged in and read the reviews, but we do collect data on the number of consumers who read your review. If you "like" another person's review we will also collect that information.

### 1.4 Notifications

If you notify us about a review that you believe violates our User Guidelines, then we collect the information you provide in your notification to us. This can include which review you notified us about, the reason for your notification, the date of your notification, etc.

### 1.5 Information from other services, including social networks like Facebook

You can connect your 'hoodHeroes profile with your profile on social networks, e.g. Facebook, and Google+ ("Social Network(s)"). When you use this option we automatically collect selected information about you from your Social Networks. The information we collect depends on what information you have made available on those Social Networks and your privacy settings for sharing such information on the Social Networks. Depending on your settings and selection, we will collect the following information:

- Name and/or username
- Email address
- Profile photo
- Who your social connections are

When you make a request to connect your 'hoodHeroes profile with a Social Network profile, you will be informed about which information we will collect from the Social Network in question. You will receive this information before your request is carried out.

You can choose to disconnect your Social Network profile from your 'hoodHeroes profile via your Account. At this point, 'hoodHeroes will remove your Social Network unique ID, and disconnect/revoke 'hoodHeroes from your Social Network. Your profile picture from your Social Network profile will remain on your 'hoodHeroes profile.

### 1.6 Cookies

Our Website uses cookies. Cookies identify your computer or device rather than you as an individual user, and are used for different purposes.

Read more about which cookies the Website uses and for which purposes below (in 8).

### 1.7 Your IP address, browser settings and location

When you visit the Website, we register your computer's IP address and browser settings. The IP address is the numerical address of the computer used to visit the Website. Browser settings can include the type of browser you use, browser language, and time zone. We collect this information so that we can trace the computer used in cases of misuse or unlawful actions in connection with visits to or use of the Website. We also use the IP address to approximate your location (at city level) and so that we know which sets of our Terms & Conditions apply to your use of our Website.

#### 1.8 Newsletters and digest emails

We collect the information you provide us with when you subscribe to receive our newsletters, digest emails or similar (we collect your name, email address and newsletter preferences). If you no longer wish to receive our newsletters, digest emails or similar, you can unsubscribe by logging into your Account and changing your settings.

#### 1.9 For what purposes do we use your personal information?

We will use the information you provide to us to:

- Provide our services to you, including displaying your reviews, and providing you with access to your profile and our Website
- Identify you as a registered user when you log in to the Website and re-visit the Website
- Verify the legitimacy of your reviews
- Improve the Website and our services
- Invite you to leave more reviews
- Respond to your questions and provide related customer service
- Pass on a message from the company you reviewed via the Website
- Contact you if your review is flagged by other users or companies and, if necessary, ask you to provide documentation to verify your review or experience
- Send you our newsletters
- Inform you when other users find your review helpful or otherwise provide feedback concerning your review
- Facilitate the social sharing function, including giving you the option to connect with members of your network who are both users of 'hoodHeroes and users of one or more Social Networks
- Display which members of your Social Networks are users of 'hoodHeroes in order to increase confidence in reviews and to create a better user experience on our Website
- Engage in various internal business purposes, i.e data analysis, audits, fraud monitoring and prevention, developing new products and services, improving or modifying the Website, or our services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities

- Comply with legal requirements and legal process, requests from public and governmental authorities, relevant industry standards and our internal policies
- Enforce our **Terms & Conditions**
- Protect our operations or those of any of our affiliates
- Protect our rights, privacy, safety or property and/or that of our affiliates, you or others
- Allow us to pursue available remedies or limit any damages that we sustain

We will also use the information in other ways for which we provide specific notice at the time of collection.

#### 1.10 On what legal basis do we process your personal data?

We need to process your personal information in order to:

- Perform our contract with you (see Article 6.1.b of the GDPR)
- Comply with our legal obligations (see Article 6.1.c of the GDPR) and operate an online review platform in compliance with, for example, the Unfair Commercial Practices Directive, ICPEN's guidelines on online reviews and endorsements, The Consumer Protection from Unfair Trading Regulations 2008, The Competition and Markets Authority's guidance on online reviews and endorsements, the Danish Consumer Ombudsman's Guidelines on publication of user reviews, the Danish Marketing Practices Act etc.
- Pursue legitimate business interests of our own related to operating the Website and providing our services to you, or to pursue the legitimate interests of third parties as long as your interests and fundamental rights do not override those interests (see Article 6.1.f of the GDPR).
- For the establishment, exercise or defence of legal claims, where necessary (see Article 9.2.f of the GDPR)

Some of these grounds for processing your personal data overlap, so there may be several reasons which justify us processing your personal information.

In those limited circumstances where you have expressly given your consent to us to process your personal data (see Article 6.1.a of the GDPR), for example, when subscribing to our newsletters, you are free to revoke your consent at any time. However, please be aware that we may have the right to continue to process your information if it can be justified on one of the other legal bases mentioned above.

You have the right to object to how we process your personal information, or ask us to restrict the processing. Please see below, at 13, for more details.

If you would like more information about our legal basis for processing your personal information, please contact our Data Protection Officer (DPO) - see 14, below.

## 2 Disclosure of personal information

### 2.1 Disclosure of personal information on the Website

We are an open review platform and we share your review on our Website so that others can read about your experience with a specific company. When you write a review, we will disclose your review, your username and other information you have chosen to connect with your public profile. Remember that if you have selected to use your name as your username, this can reveal your identity in full or in part - unless you use a pseudonym.

We recommend that you exercise care in deciding which information to make available for disclosing on the Website, and be aware that depending on the level of information provided, you may or may not be anonymous.

### **Master Data and other information**

When you write a review on our Website and create an Account, your username, review, photo, location and the number of reviews you have written will be visible on the Website. The companies you review can also receive information about your review.

### **Geo-location**

When you write a review on the Website, we use your computer's IP address (see 1.7 of this Policy, above) to approximate your location to the nearest city. This information is made available to other users of the Website.

### **Social Networks**

If you connect to a Social Network, information such as your profile photo, your name, birth year and approximate location will be collected from your Social Network profile and used to identify you on the Website. Subject to your privacy settings and the level of information available from the Social Network, users of the Website can use this information to identify which reviews you have written.

If you have chosen to preserve anonymity by using a pseudonym for your 'hoodHeroes username, be aware that information from Social Network(s) can reveal your identity in part or in full and make it possible to identify which reviews you have written.

If your contacts or friends (referred to as "Connections") on the Social Network have also connected with 'hoodHeroes, we display on the Website how you are connected to these Connections through the Social Network. This is only visible to you. Other people on 'hoodHeroes cannot see your Connections from Social Networks.

#### **2.2 Disclosure on services to which you connect your profile**

If you choose to connect your 'hoodHeroes profile with your profile on a Social Network, information and reviews provided by you on the Website or data compiled by us about your use of the service on the Website (e.g. the number of reviews you have written) will be shared with and displayed in connection with your profile on the Social Network and will be subject to the privacy policy of the Social Network.

#### **2.3 Disclosure to other services, websites and companies**

One of 'hoodHeroes's main goals is to increase the exposure and availability of reviews on the Website. We therefore permit other services to show reviews created on the Website. This increases the potential audience for your reviews.

The categories of third party services and companies who can show your review(s) together with your public user profile are:

- Search engines, including Google and Bing
- Companies reviewed on 'hoodHeroes
- Consumer portals and business portals, including price comparison websites, shopping guides, etc.
- Application partners and platforms, such as Prestashop, Magento, Shopify, WooCommerce
- Other similar websites where, in 'hoodHeroes's assessment, it will be relevant for users to search for reviews.
- Facebook "If your review has been shared on the Social Network"

Once you submit your review, it is published on the Website. This means that the following information is disclosed:

- Your review(s), (see 1.2, above)
- Your username and the additional data you choose to add to your profile, such as your name, a profile description, photo, gender, city, country, and language.

If you write a review on 'hoodHeroes in response to an invitation sent by a company via our review invitation services, the company who sent you the invite will be able to link your review with the invitation.

If we need to verify your review, we will contact you and ask for documentation that backs up your claims about the company that you have reviewed. We therefore recommend that you keep such documentation for 12 months from the date of your review.

We do not share the documentation you send to us with the reviewed company. However, if you have a reference number or order ID, we may pass that on to the company, unless you ask us not to.

## 2.4 Other disclosures

In addition to the above, we disclose your personal information to the following parties and in the following circumstances:

- To allow third party vendors, consultants and other service providers to perform services on our behalf
- To 'hoodHeroes subsidiaries and other companies within the 'hoodHeroes group of companies
- To comply with laws or to respond to claims, legal process (including but not limited to subpoenas and court orders) and requests from public and government authorities
- To cooperate with regulatory bodies and government authorities, including but not limited to Trading Standards, The Competition and Markets Authority, and the Danish Consumer Ombudsman, in connection with investigations or case referrals
- To third parties in connection with enforcement of our [Terms & Conditions](#) and Guidelines

- To third parties in order for us to protect our operations or those of our affiliates
- To third parties in order for us to pursue available remedies, or limit damages that we may sustain
- To third parties in order for us to investigate, prevent or take action regarding suspected or actual prohibited activities, including but not limited to fraud and misuse of our Website
- To a third party in the event of any reorganization, merger, acquisition, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business or assets (including in connection with any bankruptcy or similar proceedings).

### **3 Data controller**

#### **3.1 Information for which we are the data controller**

We are the data controller of the Master Data you enter to create and maintain your profile, which includes but is not limited to your name, password and email address, as well as the registration of your IP address.

We are also the data controller of the information which is disclosed to other services (see 2.3). Denmark's data protection laws govern our collection of your data.

#### **3.2 Information for which you are the data controller**

You are the data controller for the content you choose to disclose on the Website, and for the personal data disclosed when you connect your Social Network profile(s) with your profile on the Website.

### **4 Links to websites**

Our Website contains links to other websites. Our inclusion of such links does not imply that we endorse those websites. We do not control the content of those third party websites, and assume no responsibility for the third party or their policies or practices.

We encourage you to review the privacy policies for these third party websites because their procedures for collecting, handling and processing personal data will be different from ours.

### **5 Data processors and transfer of personal information outside the EU**

We use external companies to maintain the technical operation of the Website and our services. These companies are data processors for the personal data for which we are the data controller. By accepting this Policy, you agree that we may also allow the data for which you are the data controller to be processed by these data processors.

We have data processing agreements in place with the data processors and it follows from these agreements that they must act solely in accordance with our instructions. By accepting this Policy, you authorize us to instruct the data processors to process data in accordance with the Policy and for the purposes of using the Website.

The data processors have taken reasonable technical and organizational measures to protect against the information being accidentally or illegally destroyed, becoming lost or deteriorating, and to protect against the information being disclosed to unauthorized persons, being misused, or in other ways being processed in violation of data protection laws.

On your request – and possibly in return for remuneration at the data processors' applicable hourly rates at any time for such work – the data processors must supply you with sufficient information to demonstrate that the above-mentioned technical and organizational safety measures have been taken.

Some of these data processors and third party services are located outside of the European Union, such as in the US. You consent to us using data processors in unsecure third countries provided that there is a legal framework governing the transfer of your personal data and ensuring adequate protection of it, for example if the data processor is part of the EU-US Privacy Shield framework.

## **6 Data retention**

We keep the Master Data and other personal data you provide, including your reviews, for as long as you have an Account or as needed to provide you with our services. If you choose to delete your Account please note that all your reviews will also be deleted. We will delete this information upon your request and we will only save a log with the following information: your name, email address and the date of the deletion of your Account. We will keep the log for 3 years. All other information will be deleted.

If you only use our Website for searching for reviewed companies, we will retain your information and keep your Account open until you decide to close your Account. In some cases, even if you close your account, we then choose to retain certain information (e.g. visits to our Website) in an anonymized or aggregated form.

## **7 Security measures**

We use reasonable organizational, technical and administrative measures to protect your personal information within our organization and we regularly audit our system for vulnerabilities. However, since the internet is not a 100% secure environment, we cannot ensure or warrant the security of the information you transmit to us. Emails sent via the Website may not be encrypted, and we therefore advise you not to include any confidential information in your emails to us.

To learn more about our current practices and policies regarding security and other information, please see our security practices. We are always working to improve our security practices and we will update this information as these practices evolve over time.

## **8 Cookies**

The Website uses cookies and similar technologies ("Cookies"). By using our Website, you accept that we use Cookies as described below.

### **8.1 What types of Cookies do we use?**

Cookies are small pieces of information that the Website places on your computer's hard disk, on your tablet or on your smartphone. Note that HTML5 introduced Web Storage that has a similar nature to Cookies, and that we therefore consider that as a Cookie in the following.

Cookies contain information that the Website uses to make the communication between you and your web browser more efficient. Cookies identify your computer or device rather than you as an individual user.

We use session cookies, persistent cookies, HTML5 sessionStorage and HTML5 localStorage session cookies and HTML5 sessionStorage objects are temporary in nature and are deleted



when you exit your web browser. Persistent cookies are permanent in nature and are stored and remain on your computer until they are deleted. Persistent cookies expire or auto delete after a certain period of time, which is set per cookie, but are renewed each time you visit the Website. HTML5 localStorage objects are permanent in nature and remain on your computer until they are deleted.

## 8.2 What do we use Cookies for?

We use Cookies for:

### **Generating statistics**

Measuring Website traffic such as the number of visits to the Website, which domains the visitors come from, which pages they visit on the Website and in which overall geographical areas the visitors are located.

### **Monitoring Website performance and your use of our Website**

Monitoring the performance of the Website, our applications and how you use our Website and applications.

### **Authentication and improving the functionality of our Website**

Optimizing your experience with the Website, which includes remembering your username and password when you return to the Website and remembering information about your browser and preferences (e.g. which language you prefer).

### **Connecting you to Social Networks**

We give you the option of connecting with Social Networks, such as Facebook.

### **Quality assurance**

Ensuring the quality of reviews and to prevent misuse or irregularities in connection with writing reviews and using the Website.

### **Targeted advertisements**

Displaying relevant advertisements on the Website, including interest-based advertisements, which we believe are of interest to you. We use third parties to provide these advertisements when you visit the Website and other websites. These third parties may use Cookies alone or in conjunction with web beacons or other tracking technologies to collect information about your use of our Website and other websites.

## 8.3 Third party Cookies

Third party Cookies are set by third party websites – not our Website. When you visit our Website, the following third party Cookies may be set:

- Facebook cookies, set when you log in to our Website with Facebook
- Google cookies, set when you log in to our Website with Google
- Google AdSense cookies, set when displaying relevant targeted advertisements on our Website. Some cookies may be set as DoubleClick, which is part of Google

- Hotjar localStorage, set for managing how and when surveys are displayed. Read more [here](#).

#### 8.4 Deletion of cookies

You can delete the cookies already on your device. You can typically delete cookies from the Privacy or History area, available from the Settings or Options menu in the browser. In most browsers, the same menu can be reached through the Ctrl+Shift+Del keyboard shortcut or Command+Shift+Del if you're on a Mac.

If you do not accept Cookies from our Website, you may experience inconvenience in your use of the Website, and you may be prevented from accessing some of its features.

### 9 Access and insights into the personal data we have about you

If you have an Account on 'hoodHeroes, you can log in to your Account and see what information we have about you, including your reviews, and why we have that information. You can read more about how to [here](#).

If you don't have an Account, you can email [hello@hoodheroes.co](mailto:hello@hoodheroes.co) and request information about your personal data. Upon receiving your request, we will let you know what personal information we have about you, how we collect the information, the purpose for which we process your personal data, and who we share your personal information with.

### 10 Download your personal data (data portability)

If you have a user profile on 'hoodHeroes, you can download the personal data that you have provided to us, including your reviews. You can read more about how to download your personal data [here](#).

### 11 Correction and deletion of your personal data

If any of the Master Data or other personal information that we have about you in our capacity as a data controller is incorrect or misleading, you can correct most of the information yourself via your Account. We recommend that you make any the correction(s) yourself. Otherwise, you are welcome to ask us to assist with correcting your information.

You may at any time correct or delete any content and personal information on the Website for which you are the data controller (see 3.2). If your personal information changes, or if you no longer wish to appear on the Website, you can update or delete the information by logging in to your Account.

If your Account is deleted, all the data associated with your Account will be deleted, including your Master Data and reviews on the Website.

We reserve the right to block access to your Account and/or delete it if the Account or the content associated with your Account or your review(s) on the Website is, in our assessment, discriminating, racist, sexually oriented, unethical, threatening, offensive, harassing or otherwise violates applicable laws, third party rights or our User Guidelines, or is inconsistent with the purpose of the Website. If we block access to or delete your Account, we will inform you of the reason for blocking or deleting your Account by sending an email to the address you provided when you created your Account.

### 12 Other rights

In addition to the rights set out above concerning your personal data, you also have the following rights:

- You also have the right to object to the processing of your personal data and have the processing of your personal data restricted.
- In particular, you have an unconditional right to object to the processing of your personal data for direct marketing purposes.
- If our processing of your personal information is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing of data carried out before you withdrew your consent. You may withdraw your consent by emailing us at [hello@hoodheroes.co](mailto:hello@hoodheroes.co).

In some circumstances, these rights may be limited or conditional. For example, whether or not you have the right to data portability in a particular case depends on the specific circumstances of the processing activity.

### **13 Children's information**

Our Website is not intended for children. If you become aware that a child under the age of 13 has provided us with their personal information, please contact us.

### **14 Our Data Protection Officer**

We have a Data Protection Officer (DPO). If you have any questions about the data processing activities performed by us, you are welcome to contact our DPO by email at: [hello@hoodheroes.co](mailto:hello@hoodheroes.co).

### **15 Changes to this Policy**

We reserve the right to make changes to this Policy. The date shown at the start of this Policy indicates when it was last revised. If we make material changes to it, we will provide notice through our Website, or by other means, to give you the opportunity to review the changes before they come into effect. If you object to our changes, you can close your account. Your continued use of our Website after we publish or send a notice about the changes to the Policy will mean that you accept and agree to the updated Policy.

### **16 Contact information and where to send questions or complaints**

If you have questions or concerns about our Policy, how we process your personal information, or would like us to correct your personal information, feel free to contact us at: [hello@hoodheroes.co](mailto:hello@hoodheroes.co).

You can also reach us by post.

If contacting us does not resolve your complaint, you have further options, for example you may always lodge a complaint with a data protection supervisory authority, e.g. The Danish Data Protection Agency.

Our contact details are:

PennyWorthy IVS,

Lyshøj Allé 27 4 tv, 2500 Valby, Denmark

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