

# SOCIALPOST

## PRIVACY POLICY

Last Updated: October 25, 2022

SocialPost operated by PromoRepublic Oy together with its affiliated entities 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.

Please note that we have specific privacy policies applicable to individuals in certain regions and jurisdictions:

- [Privacy Policy \(USA\)](#).
- [Privacy Policy \(Australia\)](#).
- [Privacy Policy \(New Zealand\)](#).

Our Privacy Policy covers all personal data that you submit to us or that we obtain from you when you use our site [www.socialpost.cc](http://www.socialpost.cc) (the "Site") and all other related sites, applications and Services available on or through the Site. We act as the "data controller" of personal data.

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### CONTACT US

*If you have any questions about the Privacy Policy, your personal data, or you would like to exercise any of your data protection rights.*

**PromoRepublic Oy**

Company number: 2703642-5

Address: Tammasaarenkatu 1,  
00180, Helsinki, Finland

E-mail: [support@promorepublic.com](mailto:support@promorepublic.com)



## WHAT PERSONAL DATA DO WE COLLECT?

*Personal data is any information that can be used to identify a living person. It does not include data where the identity has been removed (de-identified information).*

### Information You Give Us

*Information that you may provide to us directly through the Services or otherwise communicate with us.*



**Personal and Business Contact information** provided via registration forms or through communication with our expert, 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.), your company name and other data additionally provided by you.



**Account information** provided if you create an account, such as Personal and Business Contact information, username.



**User Content** you post on our Site, such as text, images, photographs, messages, comments, or any other kind of content.



**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 details about subscription to our Services you make through the Site and billing details. If you give us credit card or other payment means information, we use it solely to check your financial qualifications and collect payment from you.



**Marketing information**, such as your preferences for receiving marketing communications and details about how you engage with them.



**Testimonials** you post on our Site or provided to us via email, such as your full name, position, company, photo and review.



## Information We Receive

*We also receive personal information indirectly from social networks.*



**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.



**From Connected Social Media Accounts.** SocialPost may allow you to connect a Social Media Account page or profile like Facebook, Twitter, Instagram, LinkedIn, Google My Business and Pinterest to your SocialPost 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, and sent posts. This includes the content of your post and engagement data (such as click rates, likes, re-shares, questions, reviews, impressions, as well as general engagement counts), to the extent permitted by applicable law. **This data will only be used by SocialPost to provide you with the Service you expect and will not be shared with any third parties.**



**From SocialPost Social Pages.** We collect information such as following / subscriptions, likes, comments, reposts / retweets, tags or any other information about your interactions and activity on SocialPost Social Pages (Facebook, Twitter, Instagram, LinkedIn).

## Information Automatically Collected

*When you access and use our Services, we automatically collect technical information (log and usage data, device data, location data).*



**Technical information.** We log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, the site 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 and Similar Technologies.

## Information Provided to Us by Third Parties

*We obtain information about you from third party sources as required or permitted by applicable law, such as public databases, business partners, and other third parties.*



**Publicly Available Information.** When you contact us on behalf of the organisation interested in our Services, we may conduct an independent search and analysis of information about the organisation from public databases. We may collect the following data: company's legal name, country of incorporation, characteristics of services and products provided; information about you available on the organisation's site, public pages on social networks concerning your position, work experience, career, etc.



**Information Related to Legal Requirements.** We collect such information to comply with our legal obligations, such as anti-money laundering (AML) laws, which is our lawful basis for processing, and to provide you with our Services.

## No Special Categories of Information

*We do not collect any "special categories of information".*



We do not request or intend to collect any sensitive data such as any information on health, race, religion, political opinions or philosophical beliefs, sexual preferences or orientation.

## Changes to Your Personal Data

*It is important that the personal data we hold about you is accurate.*



If your personal data changes during your relationship with us, update your account or contact us at [support@promorepublic.com](mailto:support@promorepublic.com).



## **LEGAL BASES AND PURPOSES FOR THE PROCESSING**

*Our processing activities have lawful bases and fit the purpose for which personal information is gathered.*

The main lawful bases we rely on for processing this information are: consent, contract, legal obligation and legitimate interests.

We will only process information that is necessary for the purpose for which it has been collected.

### **Consent and related purposes**

*Consent is freely given, informed, and unambiguous indication of your wishes to the processing of your personal data for a specific purpose.*

Where you have provided your consent, we may use and process your information to contact you about offers, promotions, events, services or information which we think will be of interest to you.

If you do withdraw your consent, and if we do not have another legal basis for the processing of your data, then we will stop the processing of your personal data and will erase in specific situations, including in case if you request the deletion of your personal data and we are obliged to erase your personal data according to the applicable law.

If we have another legal basis for the processing of your data, then we will continue to do so, subject to your legal interests and rights.

### **Contract and related purposes**

*Contract is a legal basis for the personal data processing necessary for us to perform a contract or the Terms of Service.*

We use and process your personal data where this is necessary to perform a contract or the Terms of Service to which you are a party or in order to take steps at your request prior to entering into the contract or the Terms of Service and to deliver the Services.

### **Legal Obligations and related purposes**

*Legal obligations is a legal basis for the personal data processing when there is an obligation to comply with a legal obligation to which we are subject.*

We will process your personal data to comply with our legal or regulatory requirements, for example, anti-money laundering (AML) and know your client (KYC) rules.

Applicable laws have other legal bases for the processing and when they are applicable we will rely on such bases.

### **Legitimate Interests and related purposes**

*Legitimate Interest is a legal basis for the personal data processing when it is based on our legitimate interests or the legitimate interests of a third party.*

We use and process your personal data as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so. Those interests are not outweighed by your rights and interests and those interests have a specific purpose, they are necessary, and they are balanced.



*Users support:* to respond to your feedback and correspondence and fulfil your requests; to help you through support chat.



*Promotion of our business:* to contact you with marketing information in certain cases; to contact you with targeted advertising delivered online through social media, search engines, third party sites and applications and other platforms operated by other companies, unless you object or such activity requires your consent.



*Communication with you:* to manage legal and regulatory requests and requirements; to respond to queries, complaints or claims; to enforce or protect our legal rights or to establish, bring or defend legal claims.



*Administrative and technical aspects:* to verify the accuracy of information that we hold about you; for network and information security purposes; to comply with a request from you in connection with the exercise of your rights; to inform you of updates to our terms and policies; for essential cookies.



*Preventing any violation of the Terms of Service or Privacy Policy:* we may disable access to the Services, erase or correct personal data in some cases.



## COOKIES AND SIMILAR TRACKING TECHNOLOGY

*We use “cookies” and other tracking technologies to process your data. A “cookie” is a small file stored by your device when told to do so by a Site.*

The Services 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.

SocialPost’s cookies are typically used to quickly identify your device and to “remember” your device during subsequent visits for purposes of functionality, preferences, and Site 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.



## WHO DO WE SHARE YOUR PERSONAL DATA WITH?

*To conduct our business and provide our Services we share your personal data with the following categories of recipients.*

- Our employees, contractors, group companies, third party services providers and partners who provide data processing services to us, or who otherwise process personal data for purposes that are described in this Privacy Policy or notified to you when we collect your personal data.
- Any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary as a matter of applicable law or regulation.
- 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 data only for the purposes disclosed in this Privacy Policy.
- Any other person with your consent to the disclosure.

**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.



## HOW DO WE STORE YOUR PERSONAL DATA?

*Your personal data is processed in the EEA and in any data processing facilities operated by the service providers.*

The personal data collected by SocialPost is processed at the company's offices in the European Economic Area (EEA) and in any data processing facilities operated by the service providers.



## INTERNATIONAL DATA TRANSFERS

*Your personal data may be transferred to, and processed in, countries other than the country in which you are resident.*

Specifically, our group companies, third party service providers and partners operate around the world. If we transfer or store your information outside the EEA, we rely on Adequacy Decisions as adopted by the European Commission on the basis of Article 45 of Regulation (EU) 2016/679 (GDPR), or Standard Contractual Clauses issued by the European Commission.

We implement adequate safeguards and additional technical measures to ensure your data are kept secure. By providing your data to us you agree to these transfers taking place.



## DATA RETENTION PERIODS

*We will not retain your personal data longer than necessary to achieve the purposes for which it is processed or to comply with legal requirements.*

- **Contact information** – until the purpose of collecting is reached; e.g. if you register for the webinar or event, we will erase your personal data within 6 months unless there is legal basis for future processing.
- **Account information and User Content** – as long as you have a user account: we will erase uncommitted and inactive accounts after 12 months since the last authorization; after deactivation of account we will erase your personal data within 3 months.
- **Feedback and correspondence** – until the purpose of communication is reached.
- **Transaction information and Information Related to Legal Requirements** – up to 6 years to comply with applicable legal, tax or accounting requirements.
- **Marketing information** – as long as our relations continue.
- **Information Collected from Connected Social Media Sites and Accounts** – as long as such accounts and pages are connected to your SocialPost account.
- **Information Collected from SocialPost Social Pages** – as long as the relevant page/content/user exists on a certain Social Page.
- **Technical information** – up to 2 years starting from the date of the last use of our Services.
- **Publicly available information** – as long as our communication continues.

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





## HOW DO WE KEEP YOUR PERSONAL DATA SECURE?

*We use appropriate technical and organisational measures designed to protect the personal data 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 data. Specific measures we use include encrypting your personal data 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 your privacy has been breached, please contact us immediately on [support@promorepublic.com](mailto:support@promorepublic.com).



## YOUR DATA PROTECTION RIGHTS

*You have data protection rights. Your rights will differ depending on our lawful basis for processing.*

- **Right of access** – You have the right to ask us for copies of your personal data.
- **Right to rectification** – You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Right to erasure (right to be forgotten)** – You have the right to ask us to erase your personal data in certain circumstances.

You may do so either through your account settings or by contacting us.

- **Right to restriction of processing** – You have the right to ask us to restrict the processing of your personal data in certain circumstances. This means we are permitted to store the data but not further process it. We keep just enough data to make sure we respect your request in the future.
- **Right to object to processing** – You have the right to object to the processing of your personal data (which is processed on the grounds of legitimate interests) in certain circumstances.

- **Right to data portability** – You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances. Please note that transferring your personal data does not mean that it will be erased from our systems, unless you file a request to erase your data.
- **Right 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.
- **Right to withdraw consent** – If we are processing your personal data 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 data conducted in reliance on lawful processing bases other than consent.
- **Right to complain** to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection supervisory authority. If you are a resident in the European Economic Area, you can find their contact details here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm)

### **Control**

*You can control and limit the nature of personal data that we collect and process about you in a number of ways.*

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).

### **Requests**

*We will respond to all requests we receive from individuals wishing to exercise their data protection rights.*

You can do so by contacting us at [support@promorepublic.com](mailto:support@promorepublic.com). You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.



## CHILDREN'S POLICY

*We kindly remind you that our Services are not intended for use by children under 18 years of age according to the Terms of Service.*

We do not intentionally gather personal data from visitors who are under the age of 18, without their parental or guardian's consent. If a parent or guardian becomes aware that personal data has been provided to us on behalf of a child without their consent, they should contact us. We will delete such information from our files as soon as reasonably practicable.



## UPDATES TO THIS PRIVACY POLICY

*We will take appropriate measures to inform you about changes and updates.*

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will notify you on changes on our home page or, where appropriate, by email.



## THIRD PARTY SERVICES

*Our Services may contain links to third party services.*

Be aware that by following the third party links you leave our Services. As we do not operate those sites, applications and platforms, we are not responsible for the privacy practices of the entities that operate them.

# SOCIALPOST

## PRIVACY POLICY

### (USA)

Last Updated: October 25, 2022

SocialPost operated by PromoRepublic Oy together with its affiliated entities 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.

Our Privacy Policy covers all personal data that you submit to us or that we obtain from you when you use our site [www.socialpost.cc](http://www.socialpost.cc) (the "Site") and all other related sites, applications and Services available on or through the Site.

We act as the "data controller" of personal data.

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#### CONTACT US

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**PromoRepublic Oy**

Company number: 2703642-5

Address: Tammasaarenkatu 1,  
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E-mail: [support@promorepublic.com](mailto:support@promorepublic.com)



## WHAT PERSONAL DATA DO WE COLLECT?

*Personal data is any information that can be used to identify a living person. It does not include data where the identity has been removed (de-identified information).*

### Information You Give Us

*Information that you may provide to us directly through the Services or otherwise communicate with us.*



**Personal and Business Contact information** provided via registration forms or through communication with our expert, 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.), your company name and other data additionally provided by you.



**Account information** provided if you create an account, such as Personal and Business Contact information, username.



**User Content** you post on our Site, such as text, images, photographs, messages, comments, or any other kind of content.



**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 details about subscription to our Services you make through the Site and billing details. If you give us credit card or other payment means information, we use it solely to check your financial qualifications and collect payment from you.



**Marketing information**, such as your preferences for receiving marketing communications and details about how you engage with them.



**Testimonials** you post on our Site or provided to us via email, such as your full name, position, company, photo and review.



## Information We Receive

*We also receive personal information indirectly from social networks.*



### **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.



### **From Connected Social Media Accounts**



SocialPost may allow you to connect a Social Media Account page or profile like Facebook, Twitter, Instagram, LinkedIn, Google My Business and Pinterest to your SocialPost 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, and sent posts. This includes the content of your post and engagement data (such as click rates, likes, re-shares, questions, reviews, impressions, as well as general engagement counts), to the extent permitted by applicable law. **This data will only be used by SocialPost to provide you with the Service you expect and will not be shared with any third parties.**



### **From SocialPost Social Pages**

We collect information such as following / subscriptions, likes, comments, reposts / retweets, tags or any other information about your interactions and activity on SocialPost Social Pages (Facebook, Twitter, Instagram, LinkedIn).

## Information Automatically Collected

*When you access and use our Services, we automatically collect technical information (log and usage data, device data, location data).*



**Technical information.** We log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, the site 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 and Similar Technologies.

## Information Provided to Us by Third Parties

*We obtain information about you from third party sources as required or permitted by applicable law, such as public databases, business partners, and other third parties.*



**Publicly Available Information.** When you contact us on behalf of the organisation interested in our Services, we may conduct an independent search and analysis of information about the organisation from public databases. We may collect the following data: company's legal name, country of incorporation, characteristics of services and products provided; information about you available on the organisation's site, public pages on social networks concerning your position, work experience, career, etc.



**Information Related to Legal Requirements.** We collect such information to comply with our legal obligations, such as anti-money laundering (AML) laws, which is our lawful basis for processing, and to provide you with our Services.

## No Special Categories of Information

*We do not collect any "special categories of information".*



We do not request or intend to collect any sensitive data such as any information on health, race, religion, political opinions or philosophical beliefs, sexual preferences or orientation.

## Changes to Your Personal Data

*It is important that the personal data we hold about you is accurate.*



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## **LEGAL BASES AND PURPOSES FOR THE PROCESSING**

*Our processing activities have lawful bases and fit the purpose for which personal information is gathered.*

The main lawful bases we rely on for processing this information are: consent, contract, legal obligation and legitimate interests.

We will only process information that is necessary for the purpose for which it has been collected.

### **Consent and related purposes**

*Consent is freely given, informed, and unambiguous indication of your wishes to the processing of your personal data for a specific purpose.*

Where you have provided your consent, we may use and process your information to contact you about offers, promotions, events, services or information which we think will be of interest to you.

If you do withdraw your consent, and if we do not have another legal basis for the processing of your data, then we will stop the processing of your personal data and will erase in specific situations, including in case if you request the deletion of your personal data and we are obliged to erase your personal data according to the applicable law.

If we have another legal basis for the processing of your data, then we will continue to do so, subject to your legal interests and rights.

### **Contract and related purposes**

*Contract is a legal basis for the personal data processing necessary for us to perform a contract or the Terms of Service.*

We use and process your personal data where this is necessary to perform a contract or the Terms of Service to which you are a party or in order to take steps at your request prior to entering into the contract or the Terms of Service and to deliver the Services.

### **Legal Obligations and related purposes**

*Legal obligations is a legal basis for the personal data processing when there is an obligation to comply with a legal obligation to which we are subject.*

We will process your personal data to comply with our legal or regulatory requirements, for example, anti-money laundering (AML) and know your client (KYC) rules.

Applicable laws have other legal bases for the processing and when they are applicable we will rely on such bases.

### **Legitimate Interests and related purposes**

*Legitimate Interest is a legal basis for the personal data processing when it is based on our legitimate interests or the legitimate interests of a third party.*

We use and process your personal data as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so. Those interests are not outweighed by your rights and interests and those interests have a specific purpose, they are necessary, and they are balanced.





*Users support:* to respond to your feedback and correspondence and fulfil your requests; to help you through support chat.



*Promotion of our business:* to contact you with marketing information in certain cases; to contact you with targeted advertising delivered online through social media, search engines, third party sites and applications and other platforms operated by other companies, unless you object or such activity requires your consent.



*Communication with you:* to manage legal and regulatory requests and requirements; to respond to queries, complaints or claims; to enforce or protect our legal rights or to establish, bring or defend legal claims.



*Administrative and technical aspects:* to verify the accuracy of information that we hold about you; for network and information security purposes; to comply with a request from you in connection with the exercise of your rights; to inform you of updates to our terms and policies; for essential cookies.



*Preventing any violation of the Terms of Service or Privacy Policy:* we may disable access to the Services, erase or correct personal data in some cases.



## COOKIES AND SIMILAR TRACKING TECHNOLOGY

We use “cookies” and other tracking technologies to process your data. A “cookie” is a small file stored by your device when told to do so by a Site.

The Services 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.

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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.



## WHO DO WE SHARE YOUR PERSONAL DATA WITH?

*To conduct our business and provide our Services we share your personal data with the following categories of recipients.*

- Our employees, contractors, group companies, third party services providers and partners who provide data processing services to us, or who otherwise process personal data for purposes that are described in this Privacy Policy or notified to you when we collect your personal data.
- Any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary as a matter of applicable law or regulation.
- 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 data only for the purposes disclosed in this Privacy Policy.
- Any other person with your consent to the disclosure.

**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.



## HOW DO WE STORE YOUR PERSONAL DATA?

*Your personal data is processed in the EEA and in any data processing facilities operated by the service providers.*

The personal data collected by SocialPost is processed at the company's offices in the European Economic Area (EEA) and in any data processing facilities operated by the service providers.



## INTERNATIONAL DATA TRANSFERS

*Your personal data may be transferred to, and processed in, countries other than the country in which you are resident.*

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.

By providing your data to us you agree to these transfers taking place



## DATA RETENTION PERIODS

*We will not retain your personal data longer than necessary to achieve the purposes for which it is processed or to comply with legal requirements.*

- *Contact information* – until the purpose of collecting is reached; e.g. if you register for the webinar or event, we will erase your personal data within 6 months unless there is legal basis for future processing.
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*We use appropriate technical and organisational measures designed to protect the personal data 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 data. Specific measures we use include encrypting your personal data 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 your privacy has been breached, please contact us immediately on [support@promorepublic.com](mailto:support@promorepublic.com).

## YOUR DATA PROTECTION RIGHTS

*You have data protection rights. Your rights will differ depending on our lawful basis for processing.*

- **Right of access** – You have the right to ask us for copies of your personal data.
- **Right to rectification** – You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Right to erasure (right to be forgotten)** – You have the right to ask us to erase your personal data in certain circumstances.

You may do so either through your account settings or by contacting us.

- **Right to restriction of processing** – You have the right to ask us to restrict the processing of your personal data in certain circumstances. This means we are permitted to store the data but not further process it. We keep just enough data to make sure we respect your request in the future.
- **Right to object to processing** – You have the right to object to the processing of your personal data (which is processed on the grounds of legitimate interests) in certain circumstances.

- **Right to data portability** – You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances. Please note that transferring your personal data does not mean that it will be erased from our systems, unless you file a request to erase your data.
- **Right 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.
- **Right to withdraw consent** – If we are processing your personal data 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 data conducted in reliance on lawful processing bases other than consent.
- **Right to complain** to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection supervisory authority.

### **Control**

*You can control and limit the nature of personal data that we collect and process about you in a number of ways.*

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).

### **Requests**

*We will respond to all requests we receive from individuals wishing to exercise their data protection rights.*

You can do so by contacting us at [support@promorepublic.com](mailto:support@promorepublic.com). You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.



## CALIFORNIA PRIVACY RIGHTS

This CCPA sub-section of Privacy Policy describes personal information we generally collect, use, disclose and sell in accordance with the California Consumer Privacy Act (CCPA).

- **Right to Know** – You have the right to request that we disclose what personal information we collect, use, disclose and sell about you specifically.


To submit a request to exercise the right to know, please submit an email request to [support@promorepublic.com](mailto:support@promorepublic.com) and include “California Request to Know” in the subject line. Please specify in your request the details you would like to know.

We will ask that you provide certain information to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. We will respond to your request in accordance with the CCPA.

Below is a list of the categories of personal information collected and for each category, the categories of third parties with whom we share the personal information for a business or commercial purpose.

Category of Personal Information	Categories of sources	Categories of third parties to whom it was disclosed for a business purpose
Identifiers	From the data subject, our affiliates, counterparties to transactions or disputes with the data subjects, employers, agents, or professional advisers authorised to disclose data on behalf of the data subject and from other publicly available or subscription-based sources.	Our employees, contractors, group companies, third party services providers and partners who provide data processing services to us, or who otherwise process personal data for purposes that are described in this Privacy Policy or notified to you when we collect your personal data. ...
Profile information	Via Site	

Content		
Feedback and correspondence	Via the Site, emails, calls, surveys, video conferences	
Transaction information	From the data subject, our affiliates, counterparties to transactions or disputes with the data subjects, employers, agents or professional advisers authorised to disclose data on behalf of the data subject and from other publicly available or subscription based sources.	...
Marketing information		Any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary as a matter of applicable law or regulation.
Information from Social Networking Sites	Via Facebook social media account	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 data only for the purposes disclosed in this Privacy Policy.
Personal Information Collected from Connected Social Media Accounts	Via Social Media Account page or profile like Facebook, Twitter, Instagram, LinkedIn	Any other person with your consent to the disclosure.
Information automatically collected	Via the Site	

-  **Right to Opt-out of the Sale** – California Consumers have the right to request that we not sell your personal information to third parties. We do not and will not sell California residents' personal information.

- **Right to Delete** – California Consumers have the right to request that we delete personal information about you that we have collected from you.

To submit a request to delete personal information, please submit an email request to [support@promorepublic.com](mailto:support@promorepublic.com) and include “California Request to Delete” in the subject line. Please specify in your request the personal information about you that you would like to have deleted, which can be all of your personal information as required by the CCPA.

We will ask that you provide certain information to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. Once we have verified your identity, we will ask you to confirm that you wish to have your personal information deleted. Once confirmed, we will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

- **Right to Non-Discrimination** – You may not be discriminated against because you exercise any of your rights under the CCPA.

### **Authorized Agent**

*You can designate an authorized agent to make a request under the CCPA.*

The authorized agent is a natural person or a business entity registered with the Secretary of State of California.

You should sign a written declaration that you authorize the authorized agent to act on your behalf.

If you are making any of the requests above as an authorized agent, we will require written authorization or a valid Power of Attorney. Additionally, we will seek to verify your identity in the manner stated above.



### **CHILDREN'S POLICY**

*We kindly remind you that our Services are not intended for use by children under 18 years of age according to the Terms of Service.*

We do not intentionally gather personal data from visitors who are under the age of 18, without their parental or guardian’s consent. If a parent or guardian becomes aware that personal data has been provided to us on behalf of a child without their consent, they should contact us. We will delete such information from our files as soon as reasonably practicable.





## UPDATES TO THIS PRIVACY POLICY

*We will take appropriate measures to inform you about changes and updates.*

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will notify you on changes on our home page or, where appropriate, by email.



## THIRD PARTY SERVICES

*Our Services may contain links to third party services.*

Be aware that by following the third party links you leave our Services. As we do not operate those sites, applications and platforms, we are not responsible for the privacy practices of the entities that operate them.

# SOCIALPOST

## PRIVACY POLICY

### (Australia)

Last Updated: October 25, 2022

SocialPost operated by PromoRepublic Oy together with its affiliated entities 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.

Our Privacy Policy covers all personal data that you submit to us or that we obtain from you when you use our site [www.socialpost.cc](http://www.socialpost.cc) (the "Site") and all other related sites, applications and Services available on or through the Site. We act as the "data controller" of personal data.

When handling personal information we will comply with the Australian Privacy Act 1988 and its Australian Privacy Principles (the Privacy Act). Where applicable, we will also comply with data protection laws of other jurisdictions, such as the European General Data Protection Regulation (GDPR).

- [CONTACT US](#)
- [WHAT PERSONAL DATA DO WE COLLECT?](#)
- [LEGAL BASES AND PURPOSES FOR THE PROCESSING](#)
- [COOKIES AND SIMILAR TRACKING TECHNOLOGY](#)
- [WHO DO WE SHARE YOUR PERSONAL DATA WITH?](#)
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- [YOUR DATA PROTECTION RIGHTS](#)
- [CHILDREN'S POLICY](#)
- [UPDATES TO THIS PRIVACY POLICY](#)
- [THIRD PARTY SERVICES](#)



#### CONTACT US

*If you have any questions about the Privacy Policy, your personal data, or you would like to exercise any of your data protection rights.*

**PromoRepublic Oy**

Company number: 2703642-5

Address: Tammasaarenkatu 1,  
00180, Helsinki, Finland

E-mail: [support@promorepublic.com](mailto:support@promorepublic.com)



## WHAT PERSONAL DATA DO WE COLLECT?

*Personal data is any information that can be used to identify a living person. It does not include data where the identity has been removed (de-identified information).*

### Information You Give Us

*Information that you may provide to us directly through the Services or otherwise communicate with us.*



**Personal and Business Contact information** provided via registration forms or through communication with our expert, 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.), your company name and other data additionally provided by you.



**Account information** provided if you create an account, such as Personal and Business Contact information, username, password.



**User Content** you post on our Site, such as text, images, photographs, messages, comments, or any other kind of content.



**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 details about subscription to our Services you make through the Site and billing details. If you give us credit card or other payment means information, we use it solely to check your financial qualifications and collect payment from you.



**Marketing information**, such as your preferences for receiving marketing communications and details about how you engage with them.



**Testimonials** you post on our Site or provided to us via email, such as your full name, position, company, photo and review.



## Information We Receive

*We also receive personal information indirectly from social networks.*



### **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.



### **From Connected Social Media Accounts**



SocialPost may allow you to connect a Social Media Account page or profile like Facebook, Twitter, Instagram, LinkedIn, Google My Business and Pinterest to your SocialPost 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, and sent posts. This includes the content of your post and engagement data (such as click rates, likes, re-shares, questions, reviews, impressions, as well as general engagement counts), to the extent permitted by applicable law. **This data will only be used by SocialPost to provide you with the Service you expect and will not be shared with any third parties.**



### **From SocialPost Social Pages**

We collect information such as following / subscriptions, likes, comments, reposts / retweets, tags or any other information about your interactions and activity on SocialPost Social Pages (Facebook, Twitter, Instagram, LinkedIn).

## Information Automatically Collected

*When you access and use our Services, we automatically collect technical information (log and usage data, device data, location data).*



**Technical information.** We log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, the site 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 and Similar Technologies.

## Information Provided to Us by Third Parties

*We obtain information about you from third party sources as required or permitted by applicable law, such as public databases, business partners, and other third parties.*



**Publicly Available Information.** When you contact us on behalf of the organisation interested in our Services, we may conduct an independent search and analysis of information about the organisation from public databases. We may collect the following data: company's legal name, country of incorporation, characteristics of services and products provided; information about you available on the organisation's site, public pages on social networks concerning your position, work experience, career, etc.



**Information Related to Legal Requirements.** We collect such information to comply with our legal obligations, such as anti-money laundering (AML) laws, which is our lawful basis for processing, and to provide you with our Services.

## No Special Categories of Information

*We do not collect any "special categories of information".*



We do not request or intend to collect any sensitive data such as any information on health, race, religion, political opinions or philosophical beliefs, sexual preferences or orientation.

## Changes to Your Personal Data

*It is important that the personal data we hold about you is accurate.*



If your personal data changes during your relationship with us, update your account or contact us at [support@promorepublic.com](mailto:support@promorepublic.com).



## **LEGAL BASES AND PURPOSES FOR THE PROCESSING**

*Our processing activities have lawful bases and fit the purpose for which personal information is gathered.*

The main lawful bases we rely on for processing this information are: consent, contract, legal obligation and legitimate interests.

We will only process information that is necessary for the purpose for which it has been collected.

### **Consent and related purposes**

*Consent is freely given, informed, and unambiguous indication of your wishes to the processing of your personal data for a specific purpose.*

Where you have provided your consent, we may use and process your information to contact you about offers, promotions, events, services or information which we think will be of interest to you.

If you do withdraw your consent, and if we do not have another legal basis for the processing of your data, then we will stop the processing of your personal data and will erase in specific situations, including in case if you request the deletion of your personal data and we are obliged to erase your personal data according to the applicable law.

If we have another legal basis for the processing of your data, then we will continue to do so, subject to your legal interests and rights.

### **Contract and related purposes**

*Contract is a legal basis for the personal data processing necessary for us to perform a contract or the Terms of Service.*

We use and process your personal data where this is necessary to perform a contract or the Terms of Service to which you are a party or in order to take steps at your request prior to entering into the contract or the Terms of Service and to deliver the Services.

### **Legal Obligations and related purposes**

*Legal obligations is a legal basis for the personal data processing when there is an obligation to comply with a legal obligation to which we are subject.*

We will process your personal data to comply with our legal or regulatory requirements, for example, anti-money laundering (AML) and know your client (KYC) rules.

Applicable laws have other legal bases for the processing and when they are applicable we will rely on such bases.

### **Legitimate Interests and related purposes**

*Legitimate Interest is a legal basis for the personal data processing when it is based on our legitimate interests or the legitimate interests of a third party.*

We use and process your personal data as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so. Those interests are not outweighed by your rights and interests and those interests have a specific purpose, they are necessary, and they are balanced.



*Users support:* to respond to your feedback and correspondence and fulfil your requests; to help you through support chat.



*Promotion of our business:* to contact you with marketing information in certain cases; to contact you with targeted advertising delivered online through social media, search engines, third party sites and applications and other platforms operated by other companies, unless you object or such activity requires your consent.



*Communication with you:* to manage legal and regulatory requests and requirements; to respond to queries, complaints or claims; to enforce or protect our legal rights or to establish, bring or defend legal claims.



*Administrative and technical aspects:* to verify the accuracy of information that we hold about you; for network and information security purposes; to comply with a request from you in connection with the exercise of your rights; to inform you of updates to our terms and policies; for essential cookies.



*Preventing any violation of the Terms of Service or Privacy Policy:* we may disable access to the Services, erase or correct personal data in some cases.



## COOKIES AND SIMILAR TRACKING TECHNOLOGY

We use “cookies” and other tracking technologies to process your data. A “cookie” is a small file stored by your device when told to do so by a Site.

The Services 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.

SocialPost’s cookies are typically used to quickly identify your device and to “remember” your device during subsequent visits for purposes of functionality, preferences, and Site 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.



## WHO DO WE SHARE YOUR PERSONAL DATA WITH?

*To conduct our business and provide our Services we share your personal data with the following categories of recipients.*

- Our employees, contractors, group companies, third party services providers and partners who provide data processing services to us, or who otherwise process personal data for purposes that are described in this Privacy Policy or notified to you when we collect your personal data.
- Any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary as a matter of applicable law or regulation.
- 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 data only for the purposes disclosed in this Privacy Policy.
- Any other person with your consent to the disclosure.

**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.



## HOW DO WE STORE YOUR PERSONAL DATA?

*Your personal data is processed in the EEA and in any data processing facilities operated by the service providers.*

The personal data collected by SocialPost is processed at the company's offices in the European Economic Area (EEA) and in any data processing facilities operated by the service providers.



## TRANSFERRING DATA OVERSEAS

*Your personal data may be transferred to, and processed in, countries other than the country in which you are resident.*

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, 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 and the Privacy Act.

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



## DATA RETENTION PERIODS

*We will not retain your personal data longer than necessary to achieve the purposes for which it is processed or to comply with legal requirements.*

- *Contact information* – until the purpose of collecting is reached; e.g. if you register for the webinar or event, we will erase your personal data within 6 months unless there is legal basis for future processing.
- *Account information and User Content* – as long as you have a user account: we will erase uncommitted and inactive accounts after 12 months since the last authorization; after deactivation of account we will erase your personal data within 3 month.
- *Feedback and correspondence* – until the purpose of communication is reached.
- *Transaction information and Information Related to Legal Requirements* – up to 6 years to comply with applicable legal, tax or accounting requirements.
- *Marketing information* – as long as our relations continue.
- *Information Collected from Connected Social Media Sites and Accounts* – as long as such accounts and pages are connected to your SocialPost account.
- *Information Collected from SocialPost Social Pages* – as long as the relevant page/content/user exists on a certain Social Page.
- *Technical information* – up to 2 years starting from the date of the last use of our Services.
- *Publicly available information* – as long as our communication continues.

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



## HOW DO WE KEEP YOUR PERSONAL DATA SECURE?

*We use appropriate technical and organisational measures designed to protect the personal data 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 data. Specific measures we use include encrypting your personal data 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 your privacy has been breached, please contact us immediately on [support@promorepublic.com](mailto:support@promorepublic.com).

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- **Right to rectification** – You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Right to erasure (right to be forgotten)** – You have the right to ask us to erase your personal data in certain circumstances.

You may do so either through your account settings or by contacting us.

- **Right to restriction of processing** – You have the right to ask us to restrict the processing of your personal data in certain circumstances. This means we are permitted to store the data but not further process it. We keep just enough data to make sure we respect your request in the future.
- **Right to object to processing** – You have the right to object to the processing of your personal data (which is processed on the grounds of legitimate interests) in certain circumstances.

- **Right to data portability** – You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances. Please note that transferring your personal data does not mean that it will be erased from our systems, unless you file a request to erase your data.
- **Right 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.
- **Right to withdraw consent** – If we are processing your personal data 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 data conducted in reliance on lawful processing bases other than consent.
- **Right to complain** to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection supervisory authority.

### **Control**

*You can control and limit the nature of personal data that we collect and process about you in a number of ways.*

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).

### **Requests**

*We will respond to all requests we receive from individuals wishing to exercise their data protection rights.*

You can do so by contacting us at [support@promorepublic.com](mailto:support@promorepublic.com). You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.



## CHILDREN'S POLICY

*We kindly remind you that our Services are not intended for use by children under 18 years of age according to the Terms of Service.*

We do not intentionally gather personal data from visitors who are under the age of 18, without their parental or guardian's consent. If a parent or guardian becomes aware that personal data has been provided to us on behalf of a child without their consent, they should contact us. We will delete such information from our files as soon as reasonably practicable.



## UPDATES TO THIS PRIVACY POLICY

*We will take appropriate measures to inform you about changes and updates.*

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will notify you on changes on our home page or, where appropriate, by email.



## THIRD PARTY SERVICES

*Our Services may contain links to third party services.*

Be aware that by following the third party links you leave our Services. As we do not operate those sites, applications and platforms, we are not responsible for the privacy practices of the entities that operate them.

# SOCIALPOST

## PRIVACY POLICY

### (New Zealand)

Last Updated: October 25, 2022

SocialPost operated by PromoRepublic Oy together with its affiliated entities 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.

Our Privacy Policy covers all personal data that you submit to us or that we obtain from you when you use our site [www.socialpost.cc](http://www.socialpost.cc) (the “Site”) and all other related sites, applications and Services available on or through the Site.

When handling personal information we will comply with the New Zealand Privacy Act 2020 (the Privacy Act). Where applicable, we will also comply with data protection laws of other jurisdictions, such as the European General Data Protection Regulation (GDPR).

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#### CONTACT US

*If you have any questions about the Privacy Policy, your personal data, or you would like to exercise any of your data protection rights.*

#### PromoRepublic Oy

Company number: 2703642-5

Address: Tammasaarenkatu 1,  
00180, Helsinki, Finland

E-mail: [support@promorepublic.com](mailto:support@promorepublic.com)



## WHAT PERSONAL DATA DO WE COLLECT?

*Personal data is any information that can be used to identify a living person. It does not include data where the identity has been removed (de-identified information).*

### Information You Give Us

*Information that you may provide to us directly through the Services or otherwise communicate with us.*



**Personal and Business Contact information** provided via registration forms or through communication with our expert, 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.), your company name and other data additionally provided by you.



**Account information** provided if you create an account, such as Personal and Business Contact information, username, password.



**User Content** you post on our Site, such as text, images, photographs, messages, comments, or any other kind of content.



**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 details about subscription to our Services you make through the Site and billing details. If you give us credit card or other payment means information, we use it solely to check your financial qualifications and collect payment from you.



**Marketing information**, such as your preferences for receiving marketing communications and details about how you engage with them.



**Testimonials** you post on our Site or provided to us via email, such as your full name, position, company, photo and review.



## Information We Receive

*We also receive personal information indirectly from social networks.*



**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.



**From Connected Social Media Accounts.** SocialPost may allow you to connect a Social Media Account page or profile like Facebook, Twitter, Instagram, LinkedIn, Google My Business and Pinterest to your SocialPost 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, and sent posts. This includes the content of your post and engagement data (such as click rates, likes, re-shares, questions, reviews, impressions, as well as general engagement counts), to the extent permitted by applicable law. **This data will only be used by SocialPost to provide you with the Service you expect and will not be shared with any third parties.**



**From SocialPost Social Pages.** We collect information such as following / subscriptions, likes, comments, reposts / retweets, tags or any other information about your interactions and activity on SocialPost Social Pages (Facebook, Twitter, Instagram, LinkedIn).

## Information Automatically Collected

*When you access and use our Services, we automatically collect technical information (log and usage data, device data, location data).*



**Technical information.** We log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, the site 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 and Similar Technologies.

## Information Provided to Us by Third Parties

*We obtain information about you from third party sources as required or permitted by applicable law, such as public databases, business partners, and other third parties.*



**Publicly Available Information.** When you contact us on behalf of the organisation interested in our Services, we may conduct an independent search and analysis of information about the organisation from public databases. We may collect the following data: company's legal name, country of incorporation, characteristics of services and products provided; information about you available on the organisation's site, public pages on social networks concerning your position, work experience, career, etc.



**Information Related to Legal Requirements.** We collect such information to comply with our legal obligations, such as anti-money laundering (AML) laws, which is our lawful basis for processing, and to provide you with our Services.

## No Special Categories of Information

*We do not collect any "special categories of information".*



We do not request or intend to collect any sensitive data such as any information on health, race, religion, political opinions or philosophical beliefs, sexual preferences or orientation.

## Changes to Your Personal Data

*It is important that the personal data we hold about you is accurate.*



If your personal data changes during your relationship with us, update your account or contact us at [support@promorepublic.com](mailto:support@promorepublic.com).



## **LEGAL BASES AND PURPOSES FOR THE PROCESSING**

*Our processing activities have lawful bases and fit the purpose for which personal information is gathered.*

The main lawful bases we rely on for processing this information are: consent, contract, legal obligation and legitimate interests.

We will only process information that is necessary for the purpose for which it has been collected.



### **Consent and related purposes**

*Consent is freely given, informed, and unambiguous indication of your wishes to the processing of your personal data for a specific purpose.*

Where you have provided your consent, we may use and process your information to contact you about offers, promotions, events, services or information which we think will be of interest to you.

If you do withdraw your consent, and if we do not have another legal basis for the processing of your data, then we will stop the processing of your personal data and will erase in specific situations, including in case if you request the deletion of your personal data and we are obliged to erase your personal data according to the applicable law.

If we have another legal basis for the processing of your data, then we will continue to do so, subject to your legal interests and rights.

### **Contract and related purposes**

*Contract is a legal basis for the personal data processing necessary for us to perform a contract or the Terms of Service.*

We use and process your personal data where this is necessary to perform a contract or the Terms of Service to which you are a party or in order to take steps at your request prior to entering into the contract or the Terms of Service and to deliver the Services.

### **Legal Obligations and related purposes**

*Legal obligations is a legal basis for the personal data processing when there is an obligation to comply with a legal obligation to which we are subject.*

We will process your personal data to comply with our legal or regulatory requirements, for example, anti-money laundering (AML) and know your client (KYC) rules.

Applicable laws have other legal bases for the processing and when they are applicable we will rely on such bases.

### **Legitimate Interests and related purposes**

*Legitimate Interest is a legal basis for the personal data processing when it is based on our legitimate interests or the legitimate interests of a third party.*

We use and process your personal data as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so. Those interests are not outweighed by your rights and interests and those interests have a specific purpose, they are necessary, and they are balanced.



*Users support:* to respond to your feedback and correspondence and fulfil your requests; to help you through support chat.



*Promotion of our business:* to contact you with marketing information in certain cases; to contact you with targeted advertising delivered online through social media, search engines, third party sites and applications and other platforms operated by other companies, unless you object or such activity requires your consent.



*Communication with you:* to manage legal and regulatory requests and requirements; to respond to queries, complaints or claims; to enforce or protect our legal rights or to establish, bring or defend legal claims.



*Administrative and technical aspects:* to verify the accuracy of information that we hold about you; for network and information security purposes; to comply with a request from you in connection with the exercise of your rights; to inform you of updates to our terms and policies; for essential cookies.



*Preventing any violation of the Terms of Service or Privacy Policy:* we may disable access to the Services, erase or correct personal data in some cases.



## COOKIES AND SIMILAR TRACKING TECHNOLOGY

We use “cookies” and other tracking technologies to process your data. A “cookie” is a small file stored by your device when told to do so by a Site.

The Services 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.

SocialPost’s cookies are typically used to quickly identify your device and to “remember” your device during subsequent visits for purposes of functionality, preferences, and Site 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.



## WHO DO WE SHARE YOUR PERSONAL DATA WITH?

*To conduct our business and provide our Services we share your personal data with the following categories of recipients.*

- Our employees, contractors, group companies, third party services providers and partners who provide data processing services to us, or who otherwise process personal data for purposes that are described in this Privacy Policy or notified to you when we collect your personal data.
- Any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary as a matter of applicable law or regulation.
- 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 data only for the purposes disclosed in this Privacy Policy.
- Any other person with your consent to the disclosure.

**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.



## HOW DO WE STORE YOUR PERSONAL DATA?

*Your personal data is processed in the EEA and in any data processing facilities operated by the service providers.*

The personal data collected by SocialPost is processed at the company's offices in the European Economic Area (EEA) and in any data processing facilities operated by the service providers.



## TRANSFERRING DATA OVERSEAS

*Your personal data may be transferred to, and processed in, countries other than the country in which you are resident.*

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, 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 and the Privacy Act.

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



## DATA RETENTION PERIODS

*We will not retain your personal data longer than necessary to achieve the purposes for which it is processed or to comply with legal requirements.*

- *Contact information* – until the purpose of collecting is reached; e.g. if you register for the webinar or event, we will erase your personal data within 6 months unless there is legal basis for future processing.
- *Account information and User Content* – as long as you have a user account: we will erase uncommitted and inactive accounts after 12 months since the last authorization; after deactivation of account we will erase your personal data within 3 months.
- *Feedback and correspondence* – until the purpose of communication is reached.
- *Transaction information and Information Related to Legal Requirements* – up to 6 years to comply with applicable legal, tax or accounting requirements.
- *Marketing information* – as long as our relations continue.
- *Information Collected from Connected Social Media Sites and Accounts* – as long as such accounts and pages are connected to your SocialPost account.
- *Information Collected from SocialPost Social Pages* – as long as the relevant page/content/user exists on a certain Social Page.
- *Technical information* – up to 2 years starting from the date of the last use of our Services.
- *Publicly available information* – as long as our communication continues.

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



## HOW DO WE KEEP YOUR PERSONAL DATA SECURE?

*We use appropriate technical and organisational measures designed to protect the personal data 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 data. Specific measures we use include encrypting your personal data 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 your privacy has been breached, please contact us immediately on [support@promorepublic.com](mailto:support@promorepublic.com).

## YOUR DATA PROTECTION RIGHTS

*You have data protection rights. Your rights will differ depending on our lawful basis for processing.*

- **Right of access** – You have the right to ask us for copies of your personal data.
- **Right to rectification** – You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Right to erasure (right to be forgotten)** – You have the right to ask us to erase your personal data in certain circumstances.

You may do so either through your account settings or by contacting us.

- **Right to restriction of processing** – You have the right to ask us to restrict the processing of your personal data in certain circumstances. This means we are permitted to store the data but not further process it. We keep just enough data to make sure we respect your request in the future.
- **Right to object to processing** – You have the right to object to the processing of your personal data (which is processed on the grounds of legitimate interests) in certain circumstances.

- **Right to data portability** – You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances. Please note that transferring your personal data does not mean that it will be erased from our systems, unless you file a request to erase your data.
- **Right 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.
- **Right to withdraw consent** – If we are processing your personal data 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 data conducted in reliance on lawful processing bases other than consent.
- **Right to complain** to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection supervisory authority.

For further information about privacy and the protection of privacy, visit the Office of the Privacy Commissioner’s site at [www.privacy.org.nz](http://www.privacy.org.nz).

### **Control**

*You can control and limit the nature of personal data that we collect and process about you in a number of ways.*

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).

### **Requests**

*We will respond to all requests we receive from individuals wishing to exercise their data protection rights.*

You can do so by contacting us at [support@promorepublic.com](mailto:support@promorepublic.com). You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.



## CHILDREN'S POLICY

*We kindly remind you that our Services are not intended for use by children under 18 years of age according to the Terms of Service.*

We do not intentionally gather personal data from visitors who are under the age of 18, without their parental or guardian's consent. If a parent or guardian becomes aware that personal data has been provided to us on behalf of a child without their consent, they should contact us. We will delete such information from our files as soon as reasonably practicable.



## UPDATES TO THIS PRIVACY POLICY

*We will take appropriate measures to inform you about changes and updates.*

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will notify you on changes on our home page or, where appropriate, by email.



## THIRD PARTY SERVICES

*Our Services may contain links to third party services.*

Be aware that by following the third party links you leave our Services. As we do not operate those sites, applications and platforms, we are not responsible for the privacy practices of the entities that operate them.