



# Privacy & Cookie Policy

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## PRIVACY NOTICE

Last updated May 25, 2018

Thank you for choosing to be part of our community at Feedink Sp. z o.o. (“company”, “we”, “us”, or “our”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at [contact@feedink.com](mailto:contact@feedink.com).

When you visit our website <https://feedink.com>, and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites and our services.

This privacy policy applies to all information collected through our website (such as <https://feedink.com>), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the “**Sites**”).

**Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.**



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## 1. WHAT INFORMATION DO WE COLLECT?

### Personal information you disclose to us

***In Short:** We collect personal information that you provide to us such as name, address, contact information, passwords and security data, and payment information.*

We collect personal information that you voluntarily provide to us when registering at the Sites expressing an interest in obtaining information about us or our products and services, when participating in activities on the Sites or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the Sites, the choices you make and the products and features you use. The personal information we collect can include the following:

**Name and Contact Data.** We collect your first and last name, email address, postal address, phone number, and other similar contact data.

**Credentials.** We collect passwords, password hints, and similar security information used for authentication and account access.



**Payment Data.** We collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by our payment processor and you should review its privacy policies and contact the payment processor directly to respond to your questions.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

### **Information automatically collected**

***In Short:** Some information – such as IP address and/or browser and device characteristics – is collected automatically when you visit our Sites.*

We automatically collect certain information when you visit, use or navigate the Sites. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Sites and other technical information. This information is primarily needed to maintain the security and operation of our Sites, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

### **Information collected from other sources**

***In Short:** We may collect limited data from public databases, marketing partners, and other outside sources.*

We may obtain information about you from other sources, such as public databases, joint marketing partners, as well as from other third parties. Examples of the information we receive from other sources include: social media profile information; marketing leads and search results and links, including paid listings (such as sponsored links).

## **2. HOW DO WE USE YOUR INFORMATION?**

***In Short:** We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our Sites for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests ("Business Purposes"), in order to enter into or perform a



contract with you ("Contractual"), with your consent ("Consent"), and/or for compliance with our legal obligations ("Legal Reasons"). We indicate the specific processing grounds we rely on next to each purpose listed below.


We use the information we collect or receive:

- **To facilitate account creation and logon process** with your Consent. If you choose to link your account with us to a third party account \*(such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process. See the section below headed "HOW DO WE HANDLE YOUR SOCIAL LOGINS" for further information.
- **To send you marketing and promotional communications** for Business Purposes. We and/or our third party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the "WHAT ARE YOUR PRIVACY RIGHTS" below).
- **To send administrative information to you** for Business Purposes and/or Legal Reasons. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- **Fulfill and manage your orders** for Contractual reasons. We may use your information to fulfill and manage your orders, payments, returns, and exchanges made through the Sites.
- **Deliver targeted advertising to you** for our Business Purposes. We may use your information to develop and display content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.
- **To respond to legal requests and prevent harm** for Legal Reasons. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **For other Business Purposes.** We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites, products, services, marketing and your experience.

### 3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

*In Short: We only share information with your consent, to comply with laws, to protect your rights, or to fulfill business obligations.*

We only share and disclose your information in the following situations:

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- **Compliance with Laws.** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
  - **Vital Interests and Legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
  - **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Sites, which will enable them to collect data about how you interact with the Sites over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.
  - **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
  - **Business Partners.** We may share your information with our business partners to offer you certain products, services or promotions.
  - **With your Consent.** We may disclose your personal information for any other purpose with your consent.

## 4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

*In Short: We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy.

## 5. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?



***In Short:*** We are not responsible for the safety of any information that you share with third-party providers who advertise, but are not affiliated with, our websites.

The Sites may contain advertisements from third parties that are not affiliated with us and which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Sites. You should review the policies of such third parties and contact them directly to respond to your questions.

## **6. HOW LONG DO WE KEEP YOUR INFORMATION?**

***In Short:*** We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than the period of time in which users have an account with us.

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


## **7. HOW DO WE KEEP YOUR INFORMATION SAFE?**

***In Short:*** We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Sites is at your own risk. You should only access the services within a secure environment.

## **8. DO WE COLLECT INFORMATION FROM MINORS?**

***In Short:*** We do not knowingly collect data from or market to children under 18 years of age.



We do not knowingly solicit data from or market to children under 18 years of age. By using the Sites, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Sites. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at [contact@feedink.com](mailto:contact@feedink.com).

## 9. WHAT ARE YOUR PRIVACY RIGHTS?

***In Short:** In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the **contact details** provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. 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)

### **Account Information**


If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log into your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain





features or services of our Sites. To opt-out of interest-based advertising by advertisers on our Sites visit <http://www.aboutads.info/choices/>.

**Opting out of email marketing:** You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we will still need to send you service-related emails that are necessary for the administration and use of your account. To otherwise opt-out, you may:

- Contact us using the contact information provided.

## 10. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

***In Short:** Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.*

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Sites, you have the right to request removal of unwanted data that you publicly post on the Sites. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Sites, but please be aware that the data may not be completely or comprehensively removed from our systems.

## 11. DO WE MAKE UPDATES TO THIS POLICY?

***In Short:** Yes, we will update this policy as necessary to stay compliant with relevant laws.*

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.





## 12. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, you may contact our Data Protection Officer (DPO), Piotr Zabuda, by email at [piotr@feedink.com](mailto:piotr@feedink.com), or by post to:

Feedink Sp. z o.o.  
Piotr Zabuda  
Al. Prymasa Tysiąclecia  
48A/44A  
Warsaw, \_\_\_\_\_ 01-242  
Poland

If you have any further questions or comments about us or our policies, email us at [contact@feedink.com](mailto:contact@feedink.com) or by post to:

Feedink Sp. z o.o.  
Al. Prymasa Tysiąclecia  
48A/44A  
Warsaw, \_\_\_\_\_ 01-242  
Poland  
Phone: 602366277

## PERSONAL DATA MANAGEMENT

According to the Privacy Policy, you agree to share your personal data with our service. However you still have the right to update, transfer or delete it from us. If you need further management for your data, please contact us.



# Cookie Policy

Last updated May 25, 2018

This Cookie Policy explains how Feedink Sp. z o.o. ("**feedink.com**", "**we**", "**us**", and "**ours**") use cookies and similar technologies to recognize you when you visit our websites at <https://feedink.com>, ("**Websites**"). It explains what these technologies are and why we use them, as well as your rights to control our use of them.

## What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners in order to make their websites work, or to work more efficiently, as well as to provide reporting information.

Cookies set by the website owner (in this case, feedink.com) are called "first party cookies". Cookies set by parties other than the website owner are called "third party cookies". Third party cookies enable third party features or functionality to be provided on or through the website (e.g. like advertising, interactive content and analytics). The parties that set these third party cookies can recognize your computer both when it visits the website in question and also when it visits certain other websites.

## Why do we use cookies?

We use first and third party cookies for several reasons. Some cookies are required for technical reasons in order for our Websites to operate, and we refer to these as "essential" or "strictly necessary" cookies. Other cookies also enable us to track and target the interests of our users to enhance the experience on our Online Properties. Third parties serve cookies through our Websites for advertising, analytics and other purposes. This is described in more detail below.

The specific types of first and third party cookies served through our Websites and the purposes they perform are described below (please note that the specific cookies served may vary depending on the specific Online Properties you visit):

### **Performance and functionality cookies:**



These cookies are used to enhance the performance and functionality of our Websites but are non-essential to their use. However, without these cookies, certain functionality (like videos) may become unavailable.

■ **Who serves these cookies:**

- Cookie provider: Chatra

Website URL: <https://chatra.io/privacy-policy/>

- Cookie provider: Disqus

Website URL: <https://help.disqus.com/terms-and-policies/disqus-privacy-policy>

**Analytics and customization cookies:**

These cookies collect information that is used either in aggregate form to help us understand how our Website are being used or how effective our marketing campaigns are, or to help us customize our Websites for you.

■ **Who serves these cookies:**

- Cookie provider: Google

Website URL: <https://policies.google.com/privacy>

- Cookie provider: Facebook

Website URL: <https://www.facebook.com/privacy/explanation>

- Cookie provider: Yandex

Website URL: <https://yandex.com/legal/privacy/>

- Cookie provider: Mixpanel

Website URL: <https://mixpanel.com/legal/privacy-policy/>

**Advertising cookies:**

These cookies are used to make advertising messages more relevant to you. They perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed for advertisers, and in some cases selecting advertisements that are based on your interests.

■ **Who serves these cookies:**

- Cookie provider: Facebook

Website URL: <https://www.facebook.com/privacy/explanation>

- Cookie provider: Google

Website URL: <https://policies.google.com/privacy>

### **Social networking cookies:**

These cookies are used to enable you to share pages and content that you find interesting on our Websites through third party social networking and other websites. These cookies may also be used for advertising purposes too.

#### **■ Who serves these cookies:**

- Cookie provider: Twitter

Website URL: <https://twitter.com/en/privacy>

- Cookie provider: Google

Website URL: <https://policies.google.com/privacy>

- Cookie provider: Facebook

Website URL: <https://www.facebook.com/privacy/explanation>

### **What about other tracking technologies, like web beacons?**

Cookies are not the only way to recognize or track visitors to a website. We may use other, similar technologies from time to time, like web beacons (sometimes called "tracking pixels" or "clear gifs"). These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Websites or opened an e-mail that we have sent them. This allows us, for example, to monitor the traffic patterns of users from one page within our Websites to another, to deliver or communicate with cookies, to understand whether you have come to our Websites from an online advertisement displayed on a third-party website, to improve site performance, and to measure the success of e-mail marketing campaigns. In many instances, these technologies are reliant on cookies to function properly, and so declining cookies will impair their functioning.

### **Do you serve targeted advertising?**

Third parties may serve cookies on your computer or mobile device to serve advertising through our Websites. These companies may use information about your visits to this and other websites in order to provide relevant advertisements about goods and services that you may be interested in. They may also employ technology that is used to measure the effectiveness of advertisements. This can be accomplished by them using cookies or web beacons to collect information about your visits to this and other sites in order to provide



relevant advertisements about goods and services of potential interest to you. The information collected through this process does not enable us or them to identify your name, contact details or other details that directly identify you unless you choose to provide these.

### **How can I control cookies?**

You have the right to decide whether to accept or reject cookies. You can exercise your cookie preferences by clicking on the appropriate opt-out links provided in the cookie table above.

You can set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our website though your access to some functionality and areas of our website may be restricted. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information.

In addition, most advertising networks offer you a way to opt out of targeted advertising. If you would like to find out more information, please visit <http://www.aboutads.info/choices/> or <http://www.youronlinechoices.com>.

### **How often will you update this Cookie Policy?**

We may update this Cookie Policy from time to time in order to reflect, for example, changes to the cookies we use or for other operational, legal or regulatory reasons. Please therefore re-visit this Cookie Policy regularly to stay informed about our use of cookies and related technologies.

The date at the top of this Cookie Policy indicates when it was last updated.

### **Where can I get further information?**

If you have any questions about our use of cookies or other technologies, please email us at [contact@feedink.com](mailto:contact@feedink.com) or by post to:

Feedink Sp. z o.o.  
Al. Prymasa Tysiąclecia  
48/44A  
Warsaw, \_\_\_\_\_ 01-242  
Poland