

## WEBSITE PRIVACY POLICY

This Privacy Policy is intended to explain how information about you is collected and used when you enter Gazetkowo (in Poland), Promoacro (in France), Promotons websites in other countries (“Website”), and our social media page (“Social Media”) on [Facebook](#).

### 1. GENERAL INFORMATION

Our Website, and Social Media allow you to browse leaflets with the current offers and check relevant information about selected retailers and their products. You can contact us directly or otherwise interact with us.

If you visit our Website or our Social Media, **we may collect certain information about you** that may be considered personal data. Below you will find detailed information about it and the purpose of such usage, as well as how to control your preferences.

### 2. WHAT DATA DO WE COLLECT

We may collect two main groups of data combined with your use of the Website or Social Media:

- If you are posting comments on our Social Media or otherwise interacting with the content we publish (likes, follows, shares, survey answers, etc.). The scope of such information will depend on the type of interaction and may include: your name, content of messages you send us, etc. In Social Media, each message you send or post you publish will include the name of your Social Media profile, which is likely to be your full name, as well as your profile picture, the date of interaction, and a link to your Social Media profile.
- Information is collected automatically by our Website or App, e.g. through cookies or other tracking technologies.

Such information is recorded under a unique identification number (e.g. cookie ID) we assign to your browser or device and include (1) data related to your activity on a Website along with timestamps recording moment of particular events, (2) technical information about the browser or device you are using; (3) IP address indicating your non-specific geographic location e.g. country or region.

This data does not directly disclose your identity – it only identifies the browser or device you use to enter our Website and allows us to measure the use of our Website and personalize its content and our ads to that browser or device, as described below.

Please note that Social Media platforms may collect other data in connection with your use of those platforms. Please consult their privacy policies to learn more.

### 3. HOW DO WE USE YOUR DATA

We use the collected data to:

- answer your queries

For this purpose we use the data you provide us voluntarily. For example, if you send us a message via a contact form or by on-site chat bot tool on our Website or in a direct message on Social Media,

we will process your contact data and the content of such message to handle your query, provide you with relevant information and remember what the query was about.

- run our Website properly

We achieve this by means of necessary cookies. These include technical cookies required by our system to ensure security of our Website and make certain elements accessible and operational. We may set necessary cookies without your specific consent. You may delete them and disable subsequent settings in your browser settings, however, this may prevent certain websites from displaying properly.

- personalize the content of our Website

Preference cookies are used to adjust the Website to your preferences, so that you do not have to adjust the settings each time you enter the Website. We display our offers to you based on your non-specific location data derived from a hashed IP address or based on your browsing activity on the website.

- analyze the use of our Website and Social Media pages

On our Website, the statistics cookies help us know how you interact with the content we publish, so that we may monitor and improve Website's functionalities. Statistic cookies may store information such as time and duration of your visit, subpages you entered, items you clicked etc.

To conduct these analyses, we use third party tools, such as Google Analytics. It uses the data stored in a cookie related to the device or browser, IP address and on-site activities to measure and report statistics about your interactions with our Website. Please note, that Google may link this information with data related to your activity from other sites that use Google Analytics. [Learn more about Google Analytics.](#)

You may disable sharing your data with Google Analytics by adding to your browser an extension tool that blocks Google Analytics: [Google Analytics Opt-out Add-on \(by Google\)](#). To learn more about privacy at Google, see [Google Privacy Policy](#).

We may also use other third party analytics tools providers which track your actions on our Website, such as Hotjar software which creates a map of users' clicks.

On Social Media, we may contribute to processing of your personal data by the respective platforms, by requesting aggregated insight to your interactions with our Social Media pages. To learn more, please see the description of such processing at [Facebook](#).

We may also from time to time ask for your feedback by conducting surveys or inviting you to comment and share the content we publish on our Social Media.

- conduct marketing activities

If you consent to ad personalization, we will record information concerning your visit on our Website in order to display to you personalized advertising on third party digital properties. In order to record your activity on our Website, we will use tracking technologies such as our own or third parties' marketing cookies.

We may conduct advertising campaigns by means of our own technology or third party tools (e.g. advertising on Facebook).

Third parties' technology we use to conduct marketing activities include:

- GoogleAds advertising platform. Click on the following links to [manage your data preferences at Google](#), [learn more about Google ads](#) and check [Google Privacy Policy](#).

- Facebook pixel. Click on the following links to manage your [ad preferences at Facebook](#), learn [how Facebook ads work](#) and check [Facebook Privacy Policy](#).

Based on data collected this way we may conduct advertising campaigns either using our own technology or by tools provided by those third parties (e.g. Facebook Ads). It allows us to define our audience for ad personalization and measure the effectiveness of the ads displayed by conversion tracking.

You may allow the delivery of push notifications to your browser. Such campaigns are conducted based on your IP address and by using 'cookie' technology. Once you subscribe to receive notifications, we will send you them on a regular basis with current offers of selected retailers or other marketing materials. We use the services of Pushpushgo sp. z o.o. To send you these notifications. Click [here](#) to know more about Pushpushgo's privacy practices.

- allow third party partners to advertise on our Website

If you consent to the delivery of personalized ads, we will allow our partners, such as Google (AdSense) and RTB House, to display third party advertisers' personalized ads on our Website, based on your previous activity on such advertisers' digital properties. They will collect certain technical information about your browser and the page you are entering in order to place an ad there, as the page is loading. For more information on how digital advertising works, please check [Google Privacy Policy](#) or [RTB House Privacy Policy](#) where you can disable (opt out from) such personalized advertising. Here you may check the full list of cookies we use on this Website along with their description.

We may also process your personal data to:

- defend our rights or pursue claims

This may happen e.g. if you file a complaint regarding the operation of our Website, or in case we discover an external attack on our Website.

#### **4. WHAT IS THE LEGAL BASIS FOR PROCESSING**

In order to lawfully process your personal data we need to have legal basis for such processing.

The legal basis will depend on the particular operation of processing. It may be: (i) performing a contract with you, (ii) our legitimate interests (such as developing functionalities of the Website), or (iii) your explicit consent for data processing.

If you need further information concerning the legal basis for collection and use your personal information, please contact our Data Protection Officer at: [dpo.promotons@rtbhouse.com](mailto:dpo.promotons@rtbhouse.com).

## **5. WITH WHOM WE SHARE YOUR DATA**

In order to pursue the purposes indicated above your data may be shared with the following categories of third party recipients:

- affiliated companies

We share data collected on the Website or the Social Media with our affiliated companies who are responsible for securely running the Website and the Social Media for us.

- third party contractors

For the analytical and marketing purposes, we use tools provided by third parties. Please see section 3 to learn about the purposes of processing and find useful links.

The data we process is stored in third party data centers.

- competent authorities

Your personal data may also be disclosed also to authorities which are competent by the applicable laws to receive such data, including law enforcement authorities.

We carefully select third parties to whom your data may be disclosed, in particular we make sure they grant an appropriate level of privacy security to your data and process your data only for the intended purposes as well as in compliance with this Privacy Policy and the applicable laws.

We will not transfer or permit any of your personal data to be transferred to a territory outside of the European Economic Area unless we have taken measures necessary to ensure the transfer is in compliance with applicable laws. Such measures are either transferring the personal data to a recipient in a country that the European Commission has decided provides adequate protection for Personal Data as referred to in Article 45 GDPR or conclusion of standard contractual clauses, as referred to in Article 46.2 (c).

## **6. FOR HOW LONG WILL YOUR DATA BE STORED**

We implement the following retention periods with regard your data:

- 3 years for queries submitted via the contact form on our Website,
- up to 25 months for data collected automatically via cookies or other tracking technologies on our Website,
- the period of validity of the legal basis for processing, e.g. until you object to processing, for data collected via our Social Media.

After the expiry of the following retention periods, and in any case upon your request, we will either delete or anonymize your personal data.

## **7. HOW CAN YOU EXERCISE YOUR PRIVACY RIGHTS**

To the extent provided by the applicable data protection laws, in particular the GDPR, you have the right to:

- access your personal data,

- rectify your personal data,
- request erasure of your personal data,
- object to data processing,
- restrict processing of your personal data,
- receive a copy of your data in a structured, commonly used and machine-readable format or to request transmission of the data to another controller,
- lodge a complaint with a competent supervisory authority,
- withdraw consent for data processing you gave at any time (without affecting the lawfulness of processing based on consent before its withdrawal).

We have appointed a Data Protection Officer to assist you in any privacy related matters, in particular to help you exercise the above rights. You may contact our DPO at [dpo.promotons@rtbhouse.com](mailto:dpo.promotons@rtbhouse.com).

## **8. CHILDREN'S PRIVACY**

We do not knowingly collect or solicit any information from anyone under the age of 16. Neither our Website nor App or our Social Media pages are directed to children under the age of 16. In case we learn that we have collected personal information from a child under age 16 without verification of parental consent, we will delete that information as quickly as possible.

## **9. TECHNICAL REQUIREMENTS FOR WEBSITE AND APP ACCESS**

In order to access the website you need at least:

- Internet access (dedicated line of 128 kbit/s per user at least);
- web browser: Internet Explorer ver. 5.5 and higher, Opera ver. 7.x and higher, Firefox ver. 1.x and higher, Google Chrome ver. 5.0 and higher, Safari 5 or higher.

In order to access the App you need at least:

- Internet access (dedicated line of 128 kbit/s per user at least);
- Access to Google Play, App Store or App Gallery
- Smartphone with Android System 5.0 or higher or iPhone/iPad/iPod Touch with iOS 13.0 or later

## **10. AMENDMENTS**

We keep this privacy policy under regular review to make sure it is up to date and accurate. We will notify you about its changes in advance.

## **11. CONTACT US**

The operator of the Website and the controller of personal data collected on the Website as well as on the Social Media is:

RTB Marketing & Tech Services Ltd.,  
 Kyriakou Matsi 18, 2nd Floor,  
 Egkomi, Nicosia 2408, Cyprus  
[dpo.promotons@rtbhouse.com](mailto:dpo.promotons@rtbhouse.com)

With regard to certain data collected and processed on Social Media, we and the operator of the respective social media platform may be joint controllers of your personal data, as the purposes and means of processing of such data are agreed jointly by us and such platform. If you have any

questions regarding the processing of your personal data on our Social Media, please contact our Data Protection Officer first.

You may file a complaint regarding the operation of this website to the above address or to [contact@promotons.com](mailto:contact@promotons.com). Please contact our Data Protection Officer at: [dpo.promotons@rtbhouse.com](mailto:dpo.promotons@rtbhouse.com) in any matters regarding this Privacy Policy.

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