

If you are a user located in the European Union.

Last Updated: April 10, 2020

Welcome to ScrEad. The Platform is provided or controlled by QwantumData (“ScrEad”, “we” or “us”). We are controller of your personal data in the sense of Art. 4 (7) of the General Data Protection Regulation (“GDPR”) and other data protection or data privacy laws in the Member State of the European Union and other Guidelines with a data protection nature regarding the Platform and as such, we are committed to protecting and respecting your privacy.

Our contact details are: Sint-Elisabethgaarde 2a, 7103 ZZ, Winterswijk, Netherlands. You may also contact us under info@qwantumdata.com.

To provide our services to you, we offer you a website and a free app that you can download onto your mobile phone. This policy sets out the basis on which any Personal Data from you will be processed, collected, used, and disclosed by us when you access or use our website, applications, products and content (collectively, the “Services”).

Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it. Capitalized terms that are not defined in this policy have the meaning given to them in the Terms of Service.

1. The Personal Data We Process Within Our Service

We collect and process Personal Data either directly from you (e.g. when you provide certain information to us) or indirectly (e.g. through our Platform’s technology).

“**Personal Data**” means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Information you give us as a registered user. If you register an account with us to use the Platform, you must provide us with certain Personal Data, including your unique account name, your e-mail address and, if provided, your telephone number and your photograph. You may also be able to register using your user credentials to certain social media sites, such as Facebook, LinkedIn or Google+.

Information we collect about you when you use the Services. You may use the public facing portion of the Services without registering an account. When you visit the Platform without registration we automatically collect information which will contain Personal Data, including your IP address (not using GPS data) and your language selection.

When you use our Services – whether registered or not – we automatically collect your IP address (not using GPS data) or other unique device identifiers, Cookies (as defined below), browsing records, mobile carrier, time zone and locale setting, mobile or device model, operating system and platform as well as information regarding your use of the Platform, e.g. the comments you make on our Platform (only when you are registered) or any other user-generated content and video content that you broadcast on our Platform.

Furthermore, we collect behavioral information, for example profiles and your presumed interests, alongside marketing information such as opt-ins and communication preferences. We also collect information about linking your contact or subscriber information with your activity across our Platform or by linking your activity on our Platform across all your devices using your email or social media log-in details.

Information we collect when you use the Service over the App. When you use our Service over the App on your mobile device and you are not registered to our services the Personal Data that we process consists of your IP address (not using GPS-data) and your language selection within the app. If you have registered for our service we collect your account name, e-mail address, telephone number, photographs (if provided), mobile phone model and the mobile phone system version.

Further, when you use the Platform on a mobile device, we process information about your location, including location information based on IP address or mobile device location settings, and if activated on your mobile device, by use of a Global Positioning System (GPS). If you do not wish to share your GPS location with us, you can switch off GPS functionality on your mobile device.

Information you choose to share from your social networks. If you choose to link the Platform to your social network or public forum account (such as Facebook or LinkedIn), you may provide us or allow your social network to provide us with information from your social network or public forum accounts. This data may include your use of the Platform on such public forums and/or social networks. For further information as to how and for what purpose the social network provider processes your Personal Data, please see their privacy policies.

Information from third parties. We may receive information if you use any of the other websites we operate or other Services we provide. We may also receive information, for instance, GAID, from third party SDKs, and from other sources, including business directories and other commercially or publicly available sources.

Cookies. We use cookies and other similar technologies (e.g. web beacons, Flash cookies, etc.) (“Cookies”) to enhance your experience using the Platform. Cookies are used to indirectly collect information, including Personal Data, from you. Cookies are small files which, when placed on your device, enable us to provide certain features and functionality. To learn more, please read our Cookies Policy.

2. How We Use Your Personal Data

We will use your Personal Data for the following purposes:

Personal Data that we collect from your visit on our website without your registration is processed for system administration (e.g. to improve our Website and services to you), for statistical or security purposes (e.g. to guarantee the website’s stability and security) of our website as well as to solicit your feedback. The processing of this Personal Data is necessary for the purposes of our legitimate interests pursuant to Art. 6 (1) lit. f GDPR.

In particular, we will process your Personal Data to be responsive to you and to ensure the proper functioning of our products and organization, Art. 6 (1) lit. f GDPR. As it is in our legitimate interests, we may use your Personal Data to:

- improve the Platform and to ensure content from the Platform is presented in the most effective manner for you and your device;

- administer the Platform and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- allow you to participate in interactive features of the Platform, when you choose to do so;
- personalize the content you receive and provide you with tailored content that may be of interest to you (except in regard to personalized advertising, where we will obtain your consent before providing you with any personalized ads. You can also choose whether to allow personalized ads anytime by setting your preference);
- keep the Platform safe and secure;
- develop our Platform and conduct product development;
- measure and understand the effectiveness of the advertising we serve to you and others;
- make suggestions and recommendations to you and other users of the Platform about goods or services that may interest you or them; or
- provide you – or permit selected third parties to provide you – with information about goods or services we feel may interest you. Where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

It is in our legitimate interests to promote the Platform and to use information that you give to us, such as user-generated content and video content that you may choose to broadcast on our Platform, as part of our advertising and marketing campaigns to promote the Platform in accordance with Art. 6 (1) lit. f GDPR.

If you choose to share your location with us, we will also use your data to provide you with location-based services, such as advertising and other personalized content.

When you register as user of our services, we obtain personal data to create your user account, which is necessary to provide you with you the Services according to Art. 6 (1) lit. b) of the GDPR.

We may further use your Personal Data from your registration in accordance with Art. 6 (1) lit. b) GDPR to:

- notify you about changes to our Services;
- provide you with user support;
- enforce our terms, conditions and policies; or
- communicate with you.

3. How We Share Your Personal Data

We may share your personal data with selected third parties in or outside your country, including:

- our business partners so that we can make you special offers via the Platform;
- with respect to on-screen advertisements, advertisers and advertising networks that require the data to select and serve advertisements to you and others. We will not share your contact details with our business parties so they will not contact you directly, but we will share other information so that they can make offers tailored to your requirements;
- our suppliers and subcontractors who help us run the Platform; or
- analytics and search engine providers that assist us in the improvement and optimization of the Platform.

We may share your information with any member or affiliate of our group, which includes our subsidiaries, our ultimate holding company and its subsidiaries, and companies that we control, are controlled or under common control, and our service providers and strategic business partners, and their respective subsidiaries, in each case in or outside your country, for the purposes set out above (“How We Use Your Personal Data”). For the purposes of developing and maintaining the product, we share your personal data with our group company QwantumData.

We may share your information with law enforcement agencies, public or tax authorities or other organizations if legally required to do so, or if we have a good faith belief that such use is reasonably necessary to:

- comply with a legal obligation, process or request (including tax and related reporting requirements);
- enforce our Terms of Service and other agreements, policies, and standards, including investigation of any potential violation thereof;
- detect, prevent or otherwise address security, fraud or technical issues; or
- protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law (including exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction).

We may also disclose your information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your data to the prospective seller or buyer of such business or assets; or
- if we sell, buy, merge, are acquired by, or partner with other companies or businesses, or sell some or all of our assets. In such transactions, user information may be among the transferred assets.

4. Where We Store Your Personal Data

The Personal Data that we collect from you will be transferred to, and stored at, a destination outside of your country and the European Economic Area (“EEA”), specifically, to third party servers in the United

States. We transfer your Personal Data to the servers of our host provider Amazon Web Services, Inc in the United States of America.

It may also be processed by staff operating outside your country or the EEA who work for us, for one of our suppliers or one of our business partners. Please refer below to “The Security of Your Personal Data” for the security of your Personal Data in connection with the storage.

5. The Security of Your Personal Data

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted through the Platform; any transmission is at your own risk. We do have appropriate technical and organizational measures to ensure a level of security appropriate to the risk of varying likelihood and severity for the rights and freedoms of you and other Users. We maintain these technical and organizational measures and may amend them from time to time to improve the overall security of our systems.

The transfer of your Personal Data to our host provider Amazon Web Services, Inc. is conducted under an adequate level of data protection as compared to the GDPR because Amazon.com, Inc. has certified itself under the EU-US-Privacy Shield.

We may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any information to these websites.

6. Data Retention

We will retain your information for so long as we are required to retain such information under applicable laws.

We delete your browser behavior information after 90 days. We installed a periodic review for the deletion of your browsing information and designated someone who is responsible for the review and deletion.

After you have terminated your use of our services, we may store your information in an aggregated and anonymized format. Notwithstanding the foregoing, we may also retain any personal information as reasonably necessary to comply with our legal obligations, allow us to resolve and litigate disputes, and to enforce our agreements.

7. Information Relating to Children

The Platform is not directed at children under the age of 16. Users under the relevant age are not allowed to use the Platform or register an account on the Platform without the consent of their parent or guardian. If we become aware that Personal Data has been collected from a person under such age in the relevant jurisdiction and parental or guardian consent has not been provided, we will delete this information and terminate the person’s account. If you believe that we may have Personal Data about or collected from a child under the specified age in the relevant jurisdiction without the consent of their parent or guardian, please contact us at info@qwantumdata.com.

8. Your Rights

You have the right to access your Personal Data that we hold about you and to correct, update, amend, suppress, delete or otherwise modify any Personal Data where it is inaccurate, or has been processed in violation of the applicable data protection regulations, unless we have to keep the Personal Data for legitimate business or legal purposes. Prior to the fulfilment of your request concerning your Personal Data, we may ask you to verify your identity before we can act upon your request. You may object to the use or processing of your Personal Data or withdraw consent to use your Personal Data at any time.

You have the following rights:

- The right to require free of charge (i) information whether your Personal Data is retained and (ii) access to and/or (iii) duplicates of the Personal Data retained. However, if the request affects the rights and freedoms of others or is manifestly unfounded or excessive, we reserve the right to charge a reasonable fee (taking into account the administrative costs of providing the information or communication or taking the action requested) or refuse to act on the request;
- The right to request proper rectification, removal or restriction of your Personal Data;
- Where processing of your Personal Data is either based on your consent or necessary for the performance of a contract with you and processing is carried out by automated means, the right to receive the Personal Data concerning you in a structured, commonly used and machine-readable format or to have your Personal Data transmitted directly to another company, where technically feasible (data portability);
- Where the processing of your Personal Data is based on your consent, the right to withdraw your consent at any time without impact to data processing activities that have taken place before such withdrawal or to any other existing legal justification of the processing activity in question;
- The right not to be subject to any automatic individual decisions which produces legal effects on you or similarly significantly affects you; and
- The right to take legal actions in relation to any breach of your rights regarding the processing of the Personal Data, as well as to lodge complaints before the competent data protection regulators.

As far as we process your Personal Information on the basis of our legitimate interests (Art. 6(1) lit. f) GDPR), you may object to processing (Art. 21(1) GDPR) at any time. You may find a detailed description of our processing activities and the legal basis in the section before. If you object to such processing, we ask you to state the grounds of your objection in order for us to examine the processing of your personal data and decide whether to adjust the processing accordingly.

Please note that the processing of your personal data may involve direct marketing activities as described above. If you do not want to have your activity on ScrEad's Services processed for direct marketing activities, you can object to any data processing free of charge at any time via e-mail (Art. 21(2) GDPR) (for the other Contact Details see above).

Please send an e-mail to us if you would like to exercise any of your rights (info@qwantumdata.com).

9. Complaints

In the event that you wish to make a complaint about how we process your Personal Data, please contact us in the first instance at info@qwantumdata.com and we will endeavor to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with your data protection authority or follow the dispute resolution process provided in the Terms of Service.

10. Changes

We will use commercially reasonable efforts to generally notify all users of any material changes to this Policy, such as through a notice on our Platform, however, you should look at this Policy regularly to check for such changes. We will also update the “Last Updated” date at the top of this Policy, which reflects the effective date of such Policy. Your continued access to or use of the Services after the date of the updated Policy constitutes your acceptance of the updated Policy. If you do not agree to the updated Policy, you must stop accessing or using the Services.

11. Contact

Questions, comments and requests regarding this Policy are welcomed and should be addressed to info@qwantumdata.com.