

PRIVACY POLICY

Effective date 22/12/2022

INTRODUCTION

<http://promoking.io/> is serious about protecting your privacy. This Privacy Policy governs the manner in which Repartira Digital Marketing Ltd collects, uses, maintains and discloses information collected from users ("User", "you", "yours") of the <http://promoking.io/> website ("Website"). This Privacy Policy applies to the Website and all services offered by Repartira Digital Marketing Ltd ("Company", "We", "Us", "Our").

DEFINITIONS

GDPR means the General Data Protection Regulation: the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

Controller determines the purposes and means of processing personal data.

Personal data means any information relating to a natural person who can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, and an online identifier.

Processing means any operation or set of operations which is performed on personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Processor processes personal data on behalf of the controller.

WHO COLLECTS AND HOLDS YOUR PERSONAL DATA?

Repartira Digital Marketing Ltd acts as a Controller.

Personal Data is processed on the lawful bases set out in the GDPR.

WHAT INFORMATION WE MAY COLLECT?

We may collect the following information:

A. Personal Contact Information

We may collect the following information when you contact us through the Contact Us form or directly at business@promoking.io:

- Your email address
- Your name
- Your phone number
- Other personal information willingly provided by you

B. Log Data

When interacting with our Website, certain data is automatically collected from your device or web browser. This data includes Log Data and Cookies.

We may collect information through third-party products on your devices. We use it to track our customers' usage of the Website and to understand our customers' preferences (such as country and language choices).

This Log Data may include the following information:

- Your device's Internet Protocol ("IP") address
- Device name
- Operating system version
- The configuration of the app
- The time and date of your use of the Website
- Other statistics

C. Cookies

Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser from the websites that you visit and are stored on your device's internal memory.

We use cookies to obtain aggregate data about website traffic and interaction, to identify trends and obtain statistics so that we can improve our Website. This enables us to provide services to our customers and improve their online experience.

Please refer to our Cookies Policy to better understand the usage of Cookies.

HOW DO WE USE YOUR PERSONAL DATA?

We rely on various legal grounds to process your personal information, depending on how you interact with our Website. When you request and purchase services from us, we require your personal information to fulfill the terms of our agreement. For example, we need your payment information and contact information to provide services to you.

We process your personal information on a lawful basis, such as our legitimate business interests, to fulfill a legal obligation, or to protect your vital interests.

A. We use your personal information to provide the services you request.

When you contact us, we will use the personal data you give us to communicate with you about the requested service. If you contact our customer services, we will use information about you, such as your personal contact information, payment information, or the service you have purchased to help you resolve an issue or question.

B. We use your personal information to provide details about our services and events, as well as for other promotional purposes.

We may use your contact details to send you marketing communications and news about our services, events, and other promotions with your consent. After providing consent, you are free to opt out at any time.

C. We use your personal information to improve and maintain our business and services.

We use the personal information you provide to run our business. When you make a purchase of our services, for example, we use the information for accounting, audits, and other internal purposes. We may also use information about how you use our services to improve your user experience, analyse technical and service issues, and administer our Website. We use data about how our visitors use our Website and services to understand customer behaviour and preferences.

D. We use your personal information to ensure safety.

We may use your personal information regarding how you use our Website to prevent or detect fraud, abuse, and illegal use, as well as to comply with court orders, government requests, or applicable laws.

E. We may use your personal information for other purposes.

In case we use your personal data for other purposes not mentioned above, we will notify you at the time of collection and obtain your consent where necessary.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We may share your personal data with third-party companies and individuals for the following reasons:

- To provide the services on our behalf;
- To facilitate our services;
- To assist us in analysing how our services are used.

When using third-party service providers, we enter into agreements with them that require them to keep your personal information confidential.

We may also share your personal data with other third parties to comply with a government request, a court order or applicable law; to assist in fraud prevention or investigation; to defend ourselves against third-party claims.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We retain your Personal Data only for as long as it is necessary for the purposes set out in this Privacy Policy.

We will retain and use your Personal Data to the extent necessary to comply with our legal obligations, resolve disputes, and enforce legal agreements.

We will also retain Log Data for internal security purposes. Log Data is generally retained for 2 months, except when this data is used to strengthen the security or to improve the functionality of our services, or we are legally obligated to retain this data for longer time periods.

COOKIES POLICY

Use of cookies

We use cookies to track the activity on our Website and keep certain information. A cookie is a small piece of data that is transferred to your device (e.g. your mobile device or your

computer). A cookie could allow the Website to recognize your browser, to store your preferences and other information.

The Website uses two types of cookies, namely "persistent cookies" and "session cookies." Persistent cookies remain on your device after you close your browser and can be accessed again the next time you visit the Site, while session cookies expire when you close the browser.

We use cookies to ease the use of the website, monitor and analyse the Website performance and operation, improve and optimize our Website, detect and prevent fraud, to show more relevant content to you.

Our cookies and third-party cookies

We may place our cookies on your device via the Website. These cookies include:

| Name | Type | Duration | Purpose |
|-------------------|---------|----------------------------|---|
| XSRF-TOKEN | session | When the browser is closed | Necessary Cookies that are essential to use some of the Website features. |
| promoking_session | session | When the browser is closed | Cookies that recognize users within a Website. |

We use Google Analytics for web analytics, so Google may also set cookies on your device. As further explained below, Third Parties may also place cookies on your device for advertising purposes.

These cookies collect information that helps us understand how our Website is being used and how effective our marketing campaigns are.

| Name | Type | Duration | Purpose |
|-------|------------|----------|--|
| _utma | persistent | 2 years | This cookie allows identifying unique visitors |
| _utmz | persistent | 6 months | This cookie stores the type of referral used by the visitor to reach your site, whether via a direct method, a referring link or a website search. |
| _ga | persistent | 2 years | This cookie allows identifying a unique visitor that is used to generate statistical data on how the visitor uses the website. |

Disabling Cookies

By visiting the Help section of your browser's toolbar, you can modify your browser's settings to decline cookies. Please note that if you reject cookies, you may not be able to sign in, customize the site, or use certain interactive features.

Information about managing and deleting cookies can be obtained via these links:

- [Chrome](#)
- [Firefox](#)
- [Opera](#)
- [Internet Explorer](#)
- [Safari](#)
- [Edge](#)

Changes to this Cookie Policy

We can update this Cookie Policy from time to time. If we make material changes to the Cookie Policy, we will let you know either by posting the changed Cookie Policy on the Website or by sending you an email. It is essential that you review the revised Cookie Policy. If you do not agree to the revised Cookie Policy, we cannot continue to provide you with access to the Website.

YOUR RIGHTS

For the European Union, please note that, as a data subject, pursuant to the GDPR, you have the following rights in connection with the processing of your personal data:

- I. Right of access according to Article 15, GDPR
- II. Right to rectification according to Article 16, GDPR
- III. Right to erasure according to Article 17, GDPR
- IV. Right to restriction of processing according to Article 18, GDPR
- V. Right to data portability according to Article 20, GDPR
- VI. Right to object to processing your personal data according to Article 21, GDPR
- VII. Right to withdraw your consent according to Article 7, GDPR

SECURITY

We strive to use commercially acceptable means of protecting your Personal Information because we value the trust you have placed in us by providing it. However, keep in mind that no method of data transmission over the Internet or method of electronic storage is 100% secure and reliable; therefore, we cannot guarantee its absolute security.

LINKS TO OTHER WEBSITES

This Website may contain external links. If you click on a link to a third-party website, you will be redirected there. Note that we do not operate these external websites. Therefore, we advise you to thoroughly review the Privacy Policies of these websites. We have no control

over the content, privacy policies, or practices of any third-party websites or services and assume no responsibility for them.

CONTACT US

If you require any further clarifications regarding the Privacy Policy, please do not hesitate to contact us by sending an inquiry form through the website or directly at business@promoking.io.