

## PRIVACY POLICY

*THIS PRIVACY POLICY OF PERSONAL DATA SHALL APPLY TO ALL PERSONAL DATA THAT WILL BE RECEIVED FROM USERS DURING THE REGISTRATION AND USE OF THE SITE SERVICES, PARTICIPATION IN PROMOTIONAL AND MARKETING CAMPAIGNS OR PROMOTIONS AND/OR OTHER INTERACTION WITH THE PHOTOGRAM WEBSITE*

### 1. Introduction

PHOTOGRAM website located at the address <https://photogram2020.com/> owned by PHOTOGRAM LTD Company.

The Company shall undertake to comply with any confidentiality provided to Us by our Users. This privacy policy shall describe Our current policy and practice in relation to personal data collected by Us directly from You and/or through the PHOTOGRAM website, where such personal data shall be protected by the Data Protection Law (hereinafter the "Law").

### 2. Defined Terms

The "PHOTOGRAM", "we", "us" and "our" terms when used in this Privacy Policy shall mean PHOTOGRAM LTD Company which shall include subsidiaries, divisions, branches or companies controlled by PHOTOGRAM LTD.

The "You", "You" and "Your" terms when used in this Privacy Policy shall mean any User of the PHOTOGRAM website [www.photogram2020.com](http://www.photogram2020.com) and its mobile applications.

Other terms in this document shall have the following meanings:

• **Personal data** is personal information that the User shall provide about himself/herself when registering on the PHOTOGRAM Website or in the process of using the services provided by the site, including:

- Your name;
- sex;
- date of birth;
- e-mail address;
- phone number;
- geolocation data/post address;
- other necessary data required to fill in when registering on the PHOTOGRAM website [www.photogram2020.com](http://www.photogram2020.com)

• **Privacy Policy** shall mean this Policy.

### 3. Collection of personal data

3.1 We do not store or transfer financial data to third parties, with the exception of payment service providers who make payments on our service.

3.2 We may collect, store and use the following types of personal data obtained from you upon registration: Your name, gender, address / geolocation, e-mail address, date of birth and phone number;

3.3 When you contact us by email, phone, or through any contact form provided on the website, we may ask you to provide some or all of the information specified in paragraph (a) above;

3.4 We may collect, store and use information about your computer, mobile phone or other device through which you access the website, as well as your visits to and use of the Website (including without limitation your IP- address, geolocation, browser/platform type and version, internet service provider, operating system, source of links / exit page, length of visit, page views, website navigation and search parameters you use);

3.5 If you access the Website [www.photogram2020.com](http://www.photogram2020.com) through a social network profile, then we may collect, store and use the data of that social network profile and any information contained therein to fill out any forms that you may wish to fill out on the Website.

3.6 We may ask you to complete questionnaires and provide feedback that we use for research purposes, although you do not need to answer them.

3.7 We reserve the right to monitor and/or record your communications with us by mail, voice, e-mail or any other form of transmission for the purposes of quality control, security and other business needs. Any personal data contained in such registered information shall be processed in accordance with this Privacy Policy.

3.8 We may receive your personal data from social media (Facebook, Instagram) via API, from our service providers, agents, consultants or business partners, including but not limited to news agencies, as well as from other content sources and SNS registration sites.

3.9 In cases where personal data is disclosed to us by third parties, the disclosing party shall be obliged to ensure that such personal data is disclosed with the necessary authority and consent, and we shall also process such personal data in accordance with this Privacy Policy.

#### **4. Use of personal data**

We process your personal data and transfer it to PHOTOGRAM LTD Company We only request personal data that is adequate, relevant and not excessive for the purposes for which we use your personal data. Some of these goals may include the following:

4.1 To manage your account and content that you download or license from the website [www.photogram2020.com](http://www.photogram2020.com) ;

4.2 To process any request from You;

4.3 To help diagnose any problems with our server and administer the website [www.photogram2020.com](http://www.photogram2020.com) ;

4.4 To improve your browsing experience by personalizing the website [www.photogram2020.com](http://www.photogram2020.com) ;

- 4.5 To send you newsletters or other targeted advertising messages;
- 4.6 To deal with inquiries, complaints and feedback from you and our service providers;
- 4.7 To provide third parties with statistical anonymous information about our users;
- 4.8 To send You e-mails inviting you to participate in the survey and / or provide feedback;
- 4.9 To analyze and improve the services offered on the website [www.photogram2020.com](http://www.photogram2020.com) ;
- 4.10 To show You personalized information about PHOTOGRAM on and off the website [www.photogram2020.com](http://www.photogram2020.com) and to improve your user experience;
- 4.11 We shall only disclose your personal information to others for specific and limited purposes. To be exact, when:

## **5. Disclosure of your personal data**

5.1 We shall not disclose your personal information to any third party, exception to the above is when it is required by any applicable law, government or judicial authority, or as necessary in order to allow a third party to provide its services to us.

5.2 To the extent that we shall provide personal information to third parties to enable them to perform services on our behalf, those services may include payment processing, data analysis, e-mail delivery, marketing services, hosting services and customer service. We shall require all such third-party service providers to maintain the confidentiality of the information they provide and not use your personal information for any other purpose other than providing services to us or on our behalf.

5.3 We may share or transfer information in our databases to comply with legal or regulatory requirements, to administer justice, interact with anti-fraud databases, to protect your vital interests, to protect the security or integrity of our databases or website [www.photogram2020.com](http://www.photogram2020.com) , to take precautions against legal liability, or in the event of our sale, merger, reorganization, business transfer, dissolution or similar event.

5.4 If we sell or buy any business or assets, we may disclose your personal information to a potential seller or buyer of such business or assets pursuant to a non-disclosure agreement.

5.5 If applicable, before disclosing personal data to a third party, we shall contractually require the third party to take appropriate precautions to protect that data and comply with applicable law.

## **6. Where we store your personal data**

6.1 The personal data that we shall collect from you may be transferred and stored at a destination outside the European Economic Area (“EEA”). It may also be processed by employees outside the EEA who work for us or one of our suppliers. By submitting your personal data, you agree to their transfer, storage or processing. We shall take all steps reasonably necessary to ensure that your personal data is processed securely and in accordance with this Privacy Policy.

6.2 All information that you provide to us shall be stored on our secure servers.

6.3 We take the security of your personal data very seriously. In particular, we shall make every reasonable effort to ensure that appropriate security measures are in place to protect your personal information. Unfortunately, the transmission of information over the Internet is not completely secure and therefore we cannot guarantee the security of your personal data transmitted through the website [www.photogram2020.com](http://www.photogram2020.com) ; any transmission is at your own risk. Once we shall receive your information, we shall use strict procedures and security features trying to prevent unauthorized access.

## **7. Your public profile**

7.1 Thereupon you shall have become a registered user of the website, you may provide additional information to your profile on the website [www.photogram2020.com](http://www.photogram2020.com) .

7.2 Providing additional information about yourself in excess of what is minimum required at registration is entirely up to you. Any information you shall provide during registration or in your profile section may be used by us as described in our terms of use and this Privacy Policy. You may review the personal information you shall provide to us and make any necessary changes to the information you shall post or to your account settings (including your e-mail and contact preferences) at any time by logging into your account on the website [www.photogram2020.com](http://www.photogram2020.com) .

7.3 Please note that even after processing your change request, we may temporarily store residual information about you in our backups and/or archived copies of our database.

## **8. Publicly Available Information**

8.1 We shall offer you the ability to post, provide and share content and information in public areas of the website. You should exercise caution if you choose to disclose personally identifiable information in a public domain.

8.2 Please note that this information may remain indefinitely in the public domain of the website [www.photogram2020.com](http://www.photogram2020.com) . In addition, other users may be able to view two or more of your individual transactions together. You alone are responsible for any information that you disclose and distribute in the public domain. If you are concerned about any personal information that you have posted in any public areas and you cannot delete or edit it yourself, please contact us.

## **9. Anonymous data collected through the PHOTOGRAM website** [www.photogram2020.com](http://www.photogram2020.com)

9.1 In addition to the personal data and other information we collect as described above, we use technology to collect anonymous information about website usage. For example, we use technology to track which pages of a website our users are viewing. We also use technology to determine which web browsers our users are using. This technology does not personally identify you; it simply allows us to collect statistics about our users and their use of the website [www.photogram2020.com](http://www.photogram2020.com) .

9.2 We use this anonymous data to improve the content and functionality of the website [www.photogram2020.com](http://www.photogram2020.com) and our e-mail updates to better understand our customers and visitors, and to improve the services we offer.

## **10. Cookie files**

Cookie files are text files that are stored temporarily or permanently on your computer's hard drive. Cookie files are used to authenticate, track sessions and store specific information about the use and users of the website [www.photogram2020.com](http://www.photogram2020.com). Cookie files do not damage your computer.

10.1 The data collected by cookie files is anonymous. You may delete all cookies that are already on your computer hard drive by searching for and deleting the files with “cookies” in it. In addition, if you want to prevent the storage of cookies on your computer, you may change your browser settings so that cookies are blocked. Unfortunately, if you block cookies, you may not be able to use the entire functionality of the website. For more information on cookies, please visit: [www.allaboutcookies.org](http://www.allaboutcookies.org)

10.2 If you register with us or continue to use the website [www.photogram2020.com](http://www.photogram2020.com), you agree to our use of cookies.

10.3 We also use your IP-address to help diagnose problems with our server and to administer the website [www.photogram2020.com](http://www.photogram2020.com). IP-address is a numeric code that identifies your computer on a network, or the Internet in this case. Your IP address shall also be used to collect extensive demographic information, such as determining the number of our visitors.

10.4 PHOTOGRAM may use log file information. The log file information shall be automatically reported by your browser every time you make a request to access (i.e. visit) a web-page or application. It may also be provided when the content of a web page or application is downloaded to your browser or device.

10.5 When you shall use the website, our servers shall automatically record certain information about the log file, including your web request, IP-address, browser type, link / exit pages and URLs, number of clicks and how you interact with links on the website [www.photogram2020.com](http://www.photogram2020.com), domain names, landing pages, pages viewed and other similar information. We may also collect similar information from e-mails sent to our users, which then help us track which emails are opened and which links are clicked by recipients. This information allows for more accurate reporting and website [www.photogram2020.com](http://www.photogram2020.com) improvement.

## **11. Device IDs**

11.1 We may collect information from device IDs. When you use a mobile device, such as a tablet or phone, to access our services, we may access, collect, track, store on your device and/or store one or more device identifiers remotely.

11.2 Device IDs are small data files or similar data structures stored on or associated with your mobile device that uniquely identify your mobile device. A device ID may be data stored in connection with the hardware of a device, data stored in connection with a device's

operating system or other software, or data sent to a device using a website or third party application such as Instagram.

11.3 Device ID may provide us or a third-party partner with information about how you browse and use the website [www.photogram2020.com](http://www.photogram2020.com), and may help us or other users provide reports or personalized content and advertisements. Some features of the website may not function properly if the use or availability of device IDs is unpaired or disabled.

## **12. Integrity and security of data**

12.1 We strive to maintain the reliability, accuracy, completeness and up-to-dateness of the personal data in our databases, and to protect the confidentiality and security of our databases. Current security measures on the website [www.photogram2020.com](http://www.photogram2020.com) and computer systems shall be designed to protect against loss, misuse or alteration of the information you provide to us. We only store your personal information for as long as it is reasonably necessary for the purposes for which it was collected, or to comply with any applicable legal or regulatory requirements or our data storage policy.

12.2 We use industry standard Secure Sockets Layer ("SSL") authentication to maintain confidentiality of confidential information. SSL authentication and encryption of information that you send to us over the Internet helps protect such information on the Internet from interception by third parties.

12.3 We strongly recommend You to protect your privacy. We recommend You not to share your password with anyone or share your password in an unsolicited phone call or email.

12.4 Unfortunately, despite our best efforts, there is always a risk that third parties may unlawfully intercept transmissions. For example, we cannot ensure the security of your data during transmission to us or the security of your data on iPhone, Android (or other phone devices that may use phone apps) or on another computer. This situation is true for all uses of the Internet or data transmission. As a result, we cannot guarantee the security of any information that you transfer, therefore you transfer all information at your own responsibility.

## **13. Metadata**

13.1 Metadata is usually technical data associated with user generated content. For example, metadata may describe how, when, and by whom a piece of user-generated content was collected and how that content is formatted.

13.2 The users may add or may have metadata added to their User Content, including hashtag (for example, to indicate keywords when posting a photo or video), geotag (for example, to indicate your location in a photo or video), comments, or other data. This makes your user generated content more searchable by other contributors and more interactive. If you use tags on your photo or video using other API-interfaces, then your latitude and longitude will be saved from the photo or video and are available for search (for example, via location or map function), in case your photo or video is published by you according to your privacy settings. We collect metadata directly and / or from a content source through an API.

## **14. Location based services**

14.1 We collect various forms of location data related to the content you provide. In particular, we collect general geographic location data to enable us to accurately display the geographic location of your content on the website or to allow you to search for content near your location on the website. We may collect this information directly or via API from content sources;

14.2 We collect the image file data from the EXIF file metadata. This metadata is usually automatically tagged for Your content (eg. images/photos). We collect and use this information to check the geolocation of the content You provide, and we share this information with our third party media buyers for the same purpose. We shall have Your consent to collect this data on the registration page of the website [www.photogram2020.com](http://www.photogram2020.com).

## **15. Inaccurate data**

We recommend You to ensure that your personal data is accurate and up-to-date. Please regularly update any information You have provided to us by emailing us if it changes. We shall correct or delete any personal data if you report inaccuracies to us, and also notify any third party recipients of the necessary changes.

## **16. Links to third party websites**

The site may contain links to third party websites. We are not responsible for the content of third party websites. Please ensure that You have read and understood its privacy policy and terms of use before using any such website. These documents shall govern Your rights and obligations when using the respective third party website.

## **17. Your right**

The law shall give You the right to ask us not to process your personal data for marketing purposes. We shall usually inform You (prior to collecting your data) if we intend to use Your data for such purposes or if we intend to disclose Your information to any third party for such purposes. You may exercise your right to prevent such processing by checking certain boxes on the forms we use to collect Your data. You may also exercise this right at any time by contacting us at [office@photogram.com](mailto:office@photogram.com)

## **18. Access to information**

The law shall give you the right to access the information held about you. Your right to access may be exercised in accordance with the law. Any request for access may be subject to a fee of EUR 50 to cover our costs of providing you with the detailed information we hold about you.

## **19. Changes to our Privacy Policy**

We shall reserve the right to make changes to this Privacy Policy. Any changes that we may make to our privacy policy in the future shall be posted on this page and, if necessary, communicated to You by e-mail.

## **20. Contacts**

You may send personal data requests using the address [office@photogram.com](mailto:office@photogram.com)