**Privacy Policy**

This policy was last reviewed and updated on [CURRENT DATE].

This privacy policy explains how [CONTROLLER'S LEGAL NAME] (“[CONTROLLER'S NAME]”, “we” or “us”) collects and uses information about you when you use our products and services (“services”) and why we collect certain personal data. This policy also explains the choices that you can make about the way that we use your information. We have also included relevant resources which you may use to engage with us to ensure your personal data is protected.

We adopt the European Union General Data Protection Regulation (“GDPR”) to protect your personal data and privacy. [Q104-BOOL.YES->C1->Q1] [Q104-BOOL.NO->W1->END]

[Q129-BOOL.YES->C102 AND C103->Q130]

[Q129-BOOL.NO->W10->Q130]

[Q130-BOOL.YES->C104 AND C105->Q131]

[Q130-BOOL.NO->NC45->Q131]

# SECTION 1 - ABOUT US

[Q1-INFO->[CONTROLLER'S LEGAL NAME]->C2 AND C3->Q2]

[Q2-BOOL.YES->Q166]

[Q2-BOOL.NO->Q3]

[Q166-INFO->[CONTROLLER'S REGISTER NUMBER]->C4->Q3]

# SECTION 2 – HOW YOUR PERSONAL DATA IS COLLECTED

*What is personal data?*

‘Personal data’ means any information that can be used to identify you either directly (e.g., your name and identification number) or indirectly.

*Why do we collect your personal data?*

[Q100-BOOL.YES->C77 AND C78->Q101]

[Q100-BOOL.NO->NC30->Q124]

[Q101-BOOL.YES->C79->Q102]

[Q101-BOOL.NO->NC31->Q102]

[Q109-BOOL.YES->Q110]

[Q109-BOOL.NO->NC36->Q114]

[Q110-MTPC->[LEGITIMATE INTERESTS]->Q111]

[Q111-BOOL.YES->Q112]

[Q111-BOOL.NO->Q113]

[Q112-INFO->[ADDITIONAL LEGITIMATE INTERESTS]->Q113]

[Q113-BOOL.YES->C84 AND C85 AND C86->Q114]

[Q113-BOOL.NO->NC37->Q114]

[Q114-BOOL.YES->C87->Q115]

[Q114-BOOL.NO->Q115]

[Q115-BOOL.YES->C88->Q116]

[Q115-BOOL.NO->NC38->Q118]

[Q116-BOOL.YES->C89->Q117]

[Q116-BOOL.NO->NC39->Q117]

[Q117-BOOL.YES->C90->Q118]

[Q117-BOOL.NO->NC40->Q118]

[Q118-BOOL.YES->C91 AND C92->Q119]

[Q118-BOOL.NO->Q119]

[Q119-BOOL.YES->C93->Q120]

[Q119-BOOL.NO->Q120]

[Q120-BOOL.YES->C94->Q121]

[Q120-BOOL.NO->Q121]

[Q121-BOOL.YES->C95->Q122]

[Q121-BOOL.NO->Q123]

[Q122-BOOL.YES->C96->Q123]

[Q122-BOOL.NO->Q123]

[Q123-BOOL.YES->C97->Q124]

[Q123-BOOL.NO->Q124]

[Q105-BOOL.YES->Q106]

[Q105-BOOL.NO->Q109]

[Q106-BOOL.YES->C82->Q107]

[Q106-BOOL.NO->NC34->Q109]

[Q107-BOOL.YES->Q108]

[Q107-BOOL.NO->Q109]

[Q108-BOOL.YES->C83->Q109]

[Q108-BOOL.NO->NC35->Q109]

[Q102-BOOL.YES->C80->Q103]

[Q102-BOOL.NO->NC32->Q103]

[Q103-BOOL.YES->C81->Q105]

[Q103-BOOL.NO->NC33->Q105]

[Q82-BOOL.YES->Q83]

[Q82-BOOL.NO->NC22->Q84]

[Q83-BOOL.YES->C64->Q84]

[Q83-BOOL.NO->NC23->Q84]

[Q84-BOOL.YES->C65->Q85]

[Q84-BOOL.NO->NC24->Q85]

[Q85-BOOL.YES->C66->Q86]

[Q85-BOOL.NO->NC25->Q86]

What personal data do we collect?

[Q61-BOOL.YES->Q62]

[Q61-BOOL.NO->Q70]

[Q62-MTPC->[PERSONAL DATA]->Q63]

[Q63-BOOL.YES->Q64]

[Q63-BOOL.NO->Q165]

[Q64-INFO->[ADDITIONAL PERSONAL DATA]->Q165]

[Q165-BOOL.YES->C52->Q65]

[Q165-BOOL.NO->NC58->Q65]

How do we collect your personal data?

**Collect directly from you**

[Q65-MTPC->[DIRECT SOURCES]->Q66]

[Q66-BOOL.YES->Q67]

[Q66-BOOL.NO-Q68]

[Q67-INFO->[ADDITIONAL DIRECT SOURCES]->Q68]

[Q68-BOOL.YES->C50 AND C51->Q69]

[Q68-BOOL.NO->NC20->Q69]

**Collect through our partners, third parties or data collection tools**

[Q70-BOOL.YES->C54 AND C55->Q71]

[Q70-BOOL.NO->Q79]

[Q71-MTPC->[INDIRECT SOURCES]->Q72]

[Q72-BOOL.YES->Q73]

[Q72-BOOL.NO->Q74]

[Q73-INFO->[ADDITIONAL INDIRECT SOURCES]->Q74]

[Q74-MTPC->[COOKIE SOURCES]->Q75]

[Q75-BOOL.YES->Q76]

[Q75-BOOL.NO->Q77]

[Q76-INFO->[ADDITIONAL COOKIE SOURCES]->Q77]

[Q77-BOOL.YES->C56 AND C57 AND C58->Q78]

[Q77-BOOL.NO-NC21->Q79]

[Q78-BOOL.YES->C59 AND C60->Q82]

[Q78-BOOL.NO->W9->Q82]

[Q79-BOOL.YES->C61->Q80]

[Q79-BOOL.NO->Q81]

[Q80-BOOL.YES->C62->Q81]

[Q80-BOOL.NO->Q81]

[Q81-BOOL.YES->C63->Q82]

[Q81-BOOL.NO->Q82]

[Q54-BOOL.YES->Q55]

[Q54-BOOL.NO->Q56]

[Q55-BOOL.YES->C46->Q56]

[Q55-BOOL.NO->W4-Q56]

[Q56-BOOL.YES->Q57]

[Q56-BOOL.NO->W8->Q58]

[Q57-BOOL.YES->C47->Q58]

[Q57-BOOL.NO->W5->Q58]

**Collect through email communication/direct marketing**

[Q58-BOOL.YES->Q59]

[Q58-BOOL.NO->W12->Q61]

[Q59-BOOL.YES->C48 AND C49->Q60]

[Q59-BOOL.NO->W6->Q61]

[Q60-BOOL.YES->Q61]

[Q60-BOOL.NO->W7->Q61]

# SECTION 3 - HOW YOUR PERSONAL DATA IS USED

[Q131-BOOL.YES->Q132]

[Q131-BOOL.NO->NC46->Q136]

[Q132-MTPC->[PROCESSING PURPOSES]-Q133]

[Q133-BOOL.YES->Q134]

[Q133-BOOL.NO->Q135]

[Q134-INFO->[ADDITIONAL PROCESSING PURPOSES]->Q135]

[Q135-BOOL.YES->C106->Q136]

[Q135-BOOL.NO->NC46->Q136]

[Q136-BOOL.YES->Q137]

[Q136-BOOL.NO->Q141]

[Q137-MTPC->[THIRD PARTY PURPOSES]->Q138]

[Q138-BOOL.YES->Q139]

[Q138-BOOL.NO->Q140]

[Q139-INFO->[ADDITIONAL THIRD PARTY PURPOSES]->Q140]

[Q140-BOOL.YES->C107->Q141]

[Q140-BOOL.NO->NC147->Q141]

[Q141-BOOL.YES->Q164]

[Q141-BOOL.NO->Q142]

[Q164-BOOL.YES->C108->Q142]

[Q164-BOOL.NO->NC48->Q142]

[Q142-BOOL.YES->Q143]

[Q142-BOOL.NO->Q147]

[Q143-MTPC->[USE OF COOKIES PURPOSES]->Q144]

[Q144-BOOL.YES->Q145]

[Q144-BOOL.NO->Q146]

[Q145-INFO->[ADDITIONAL USE OF COOKIES PURPOSES]->Q146]

[Q146-BOOL.YES->C109->Q147]

[Q146-BOOL.NO->NC49->Q147]

[Q147-BOOL.YES->Q148]

[Q147-BOOL.NO->Q153]

[Q148-MTPC->[RECIPIENTS]->Q149]

[Q149-BOOL.YES->Q150]

[Q149-BOOL.NO->Q151]

[Q150-INFO->[ADDITIONAL RECIPIENTS]->Q151]

[Q151-BOOL.YES->C110->Q152]

[Q151-BOOL.NO->NC50->Q152]

[Q152-BOOL.YES->C111->Q153]

[Q152-BOOL.NO->NC51->Q153]

# SECTION 4 – HOW YOUR PERSONAL DATA IS STORED

How do we store your data?

[Q88-BOOL.YES->Q89]

[Q88-BOOL.NO->Q93]

[Q89-MTPC->[PD TIME STORED CRITERIA]->Q90]

[Q90-BOOL.YES->Q91]

[Q90-BOOL.NO->Q92]

[Q91-INFO->[ADDITIONAL PD TIME STORED CRITERIA]->Q92]

[Q92-BOOL.YES->C71 AND C72 AND C73->Q93]

[Q92-BOOL.NO->NC27->Q93]

How do we retain your data?

[Q93-BOOL.YES->Q94]

[Q93-BOOL.NO->Q98]

[Q94-MTPC->[RETENTION CRITERIA]->95]

[Q95-BOOL.YES->Q96]

[Q95-BOOL.NO->Q97]

[Q96-INFO->[ADDITIONAL RETENTION CRITERIA]->Q97]

[Q97-BOOL.YES->C74 AND C75->Q98]

[Q97-BOOL.NO->NC28->Q98]

[Q98-BOOL.YES->Q99]

[Q98-BOOL.NO->Q100]

[Q99-BOOL.YES->C76->Q100]

[Q99-BOOL.NO->NC29->Q100]

# SECTION 5 – INDIVIDUAL RIGHTS

We would like to make sure you are fully aware of all your data protection rights.

[Q27-BOOL.YES->C21 AND C22->Q28]

[Q27-BOOL.NO->NC7->Q88]

You have the following rights:

* *Right to access*   
  [Q28-BOOL.YES->C23 AND C24->Q29]

[Q28-BOOL.NO->NC8->Q32]

[Q29-BOOL.YES->Q30]

[Q29-BOOL.NO->Q31]

[Q30-INFO->[CONTROLLER'S EMAIL2]->C25->Q31]

* *Right to judicial review*

[Q31-BOOL.YES->C26->Q32]

[Q31-BOOL.NO->NC9->Q32]

* *Right to rectification*  
  [Q37-BOOL.YES->C32 AND C33->Q38]

[Q37-BOOL.NO->NC13->Q40]

[Q38-BOOL.YES->Q39]

[Q38-BOOL.NO->Q40]

[Q39-INFO->[CONTROLLER'S EMAIL4]->C34->Q40]

* *Right to erasure*  
  [Q32-BOOL.YES->C27->Q33]

[Q32-BOOL.NO->NC10->Q35]

[Q33-BOOL.YES->Q34]

[Q33-BOOL.NO->Q35]

[Q34-INFO->[CONTROLLER'S EMAIL3]->C28->Q35]

* *Right to restrict of processing*  
  [Q40-BOOL.YES->C35 AND C36->Q41]  
  [Q40-BOOL.NO->NC14->Q41]
* *Right to object to processing*  
  [Q35-BOOL.YES->C29->Q36]

[Q35-BOOL.NO->NC11->Q36]

* *Right to object to automated processing*  
  [Q52-BOOL.YES->Q53]

[Q52-BOOL.NO->Q54]

[Q53-BOOL.YES->C45->Q54]

[Q53-BOOL.NO->NC19->Q54]

* *Right to data portability*  
  [Q36-BOOL.YES->C30 AND C31->Q37]  
  [Q36-BOOL.NO->NC12->Q37]

[Q41-BOOL.YES->Q42]

[Q41-BOOL.NO->NC15->Q44]

[Q42-BOOL.YES->C37->Q43]

[Q42-BOOL.NO->NC16->Q44]

[Q43-BOOL.YES->C38->Q44]

[Q43-BOOL.NO->W2->Q44]

# SECTION 6 – TRANSFER OUTSIDE EUROPE

[Q153-BOOL.YES->Q154]

[Q153-BOOL.NO->W14->Q159]

[Q154-BOOL.YES->C112 AND C113->Q155]

[Q154-BOOL.NO->NC52->Q155]

[Q155-BOOL.YES->C114 AND C115->Q156]

[Q155-BOOL.NO->Q159]

[Q156->BOOL.YES->C116->Q157]

[Q156-BOOL.NO->NC53->Q159]

[Q157-BOOL.YES->C117->Q158]

[Q157-BOOL.NO->NC54->Q159]

[Q158-BOOL.YES->C118->C159]

[Q158-BOOL.NO->NC55->Q159]

[Q69-BOOL.YES->Q167]

[Q69-BOOL.NO->Q70]

[Q167-INFO->[US CONTROLLER'S NAME]->C53->Q70]

# SECTION 7 – CHILDREN’S DATA

[Q159-BOOL.YES->Q160]

[Q159-BOOL.NO->C119 AND C120 AND C121->Q161]

[Q160-BOOL.YES->C122 AND C123->Q162]

[Q160-BOOL.NO->NC56->Q161]

[Q161-BOOL.YES->C124->Q162]

[Q161-BOOL.NO->NC57->END]

[Q162-BOOL.YES->C125->END]

[Q162-BOOL.NO->W11->END]

# SECTION 8 – COMPLAINT HANDLING

Complaint handling with the controller

[Q49-BOOL.YES->Q50]

[Q49-BOOL.NO->NC18->Q52]

[Q50-INFO->[CONTROLLER'S NAME2]->Q51]

[Q51-INFO->[CONTROLLER’S EMAIL5]->C44->Q52]

[Q87-BOOL.YES->C69 AND C70->Q88]

[Q87-BOOL.NO->Q88]

Complaint handling with a supervisory authority

[Q44-BOOL.YES->C39 AND C40->Q45]

[Q44-BOOL.NO->NC17->Q49]

[Q45-BOOL.YES->Q163]

[Q45-BOOL.NO->W3->Q49]

[Q163-INFO->C7->Q46]

[Q46-INFO->C41->Q47]

[Q47-INFO->C42->Q48]

[Q48-INFO->C43->Q49]

# SECTION 9 – HOW YOUR PERSONAL DATA IS PROTECTED

[Q124.BOOL.YES->C98->Q125]

[Q124-BOOL.NO->NC41->Q129]

[Q125-BOOL.YES->Q126]

[Q125-BOOL.NO->C99->Q127]

[Q126-BOOL.YES->Q127]

[Q126-BOOL.NO->NC42->Q127]

[Q127-BOOL.YES->C100->Q128]

[Q127-BOOL.NO->NC43->Q128]

Notification of data breaches

[Q86-BOOL.YES->C67 AND C68->Q87]

[Q86-BOOL.NO->NC26->Q87]

[Q128-BOOL.YES->C101->Q129]

[Q128-BOOL.NO->NC44->Q129]

# SECTION 10 – CONTACT INFORMATION

Contact us

[Q3-INFO->[CONTROLLER'S LEGAL ADDRESS]->Q4]

[Q4-INFO->[CONTROLLER'S EMAIL]->Q5]

[Q5-BOOL.YES->C5 AND C6->Q6]

[Q5-BOOL.NO->NC1->Q6]

Contact our Controller Representative

[Q6-BOOL.YES->Q7]

[Q6-BOOL.NO->W13->Q12]

[Q7-INFO->[CONTROLLER REPRESENTATIVE'S LEGAL NAME]->Q8]

[Q8-INFO->[CONTROLLER REPRESENTATIVE'S LEGAL ADDRESS]->Q9]

[Q9-INFO->[CONTROLLER REPRESENTATIVE'S EMAIL]->Q10]

[Q10-INFO->[CONTROLLER REPRESENTATIVE'S PHONE NUMBER]->Q11]

[Q11-BOOL.YES->C8 AND C9 AND C10 AND C11->Q12]

[Q11-BOOL.NO->NC2->Q12]

Contact our Data Protection Officer (DPO)

[Q12-BOOL.YES->Q13]

[Q12-BOOL.NO->NC3->Q27]

[Q13-BOOL.YES->Q14]

[Q13-BOOL.NO->Q18]

[Q14-INFO->[DPO'S LEGAL NAME]->Q15

[Q15-INFO->[DPO'S LEGAL ADDRESS]->Q16]

[Q16-INFO->[DPO'S EMAIL]->Q17]

[Q17-BOOL.YES->C12 AND C13 AND C14-Q27]

[Q17-BOOL.NO->NC4->Q27]

[Q18-BOOL.YES->Q19]

[Q18-BOOL.NO->Q23]

[Q19-INFO->[EU DPO'S LEGAL NAME]->Q20]

[Q20-INFO->[EU DPO'S LEGAL ADDRESS]->Q21]

[Q21-INFO->[EU DPO'S EMAIL]->Q22]

[Q22-BOOL.YES->C15 AND C16 AND C17->Q27]

[Q22-BOOL.NO->NC5->Q27]

[Q23-INFO->[NON-EU DPO'S LEGAL NAME]->Q24]

[Q24-INFO->[NON-EU DPO'S LEGAL ADDRESS]->Q25]

[Q25-INFO->[NON-EU DPO'S EMAIL]->Q26]

[Q26-BOOL.YES->C18 AND C19 AND C20->Q27]

[Q26-BOOL.NO->NC6->Q27]