

RAFFLEE PRIVACY POLICY

Webmaster and Data Controller

SAS RAFFLEE

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Webmaster's contact email: contact@rafflee.io

- **DEFINITIONS**

Personal Data	Any information which, directly, indirectly or in connection with other information - including a personal identification number - enables the identification or potential identification of a natural person.
Use Data	Information collected automatically by the Website (or by third party services employed by the Website), which may include the IP addresses or domain names of the computers used by Users using the Website, the URI (Uniform Resource Identifier) addresses, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numeric code indicating the status of the server's response (favorable result, error, etc.) and the number of times the request was submitted to the server.), the country of origin, the characteristics of the browser and operating system used by the User, various details relating to the time per visit (e.g. time spent on each page in the Website) and details relating to the path followed in the Website with special reference to the sequence of pages visited, and other parameters relating to the User's operating system or computer environment.
User	The person using the Website which, unless otherwise specified, corresponds to the Concerned Person.
Concerned Person	The natural person to whom the Personal Data refers.
Subcontractor (or Data Controller)	The natural or legal person, public authority, institution or any other body that processes Personal Data on behalf of the Data Controller, as described in this privacy policy
Data controller (or Webmaster)	The natural or legal person, public authority, institution or any other body that, alone or jointly with others, determines the purposes and the means of processing Personal Data, including security measures concerning the operation and use of the Website. Unless otherwise specified, the Data Controller is the Webmaster of the Website.
Website	The medium by which the User's Personal Data is collected and processed.
Service	The service provided by the Website as described in the terms and conditions relating thereto (if any) and on the Website.

European Union (or EU)

Unless otherwise stated, all references in this document to the European Union include all current Member States of the European Union and the European Economic Area.

Cookies

Small data sets stored in the User's device.

- **TYPES OF COLLECTED DATA**

Among the types of Personal Data that the Website collects directly or through third parties are: Cookies; Use Data; unique device identifier for advertising (e.g., login Google advertising); first name; last name; email address; profile picture; social media accounts; device information; geographic area; session length; Website openings; first launches; operating systems; unique universal identifier (UUID); failure information; Authorization for approximate (non-continuous) location; Authorization for storage.

Full details of each type of Personal Data collected are provided in the sections dedicated to this privacy policy of the service or by means of explanatory specific texts published prior to the collection of the Data.

Personal Data may be freely provided by the User, or, in the case of Use Data, collected automatically when you use the Website.

Unless otherwise specified, all Data requested by the Website are mandatory for the provision of the Service and their absence may make it impossible for the Website to provide the Services. In the event that the Website specifies that certain Data is not mandatory, Users are free not to communicate them without any consequences on the availability or functioning of the Service.

Users who have any doubts about the required Personal Data are invited to contact the Webmaster.

Any use of Cookies - or other tracking tools - by the Website or by Webmasters of third party services used by the Website is intended to provide the Service requested by the User, in addition to the other finalities described in this document and in the Cookie Policy, if available.

Users are responsible for any Personal Data of third parties obtained, published or communicated through the Website and confirm that they obtain the consent of the third party to provide the Data to the Webmaster.

- **METHOD AND PLACE OF DATA PROCESSING**

- **Methods of treatment**

The Webmaster takes appropriate security measures in order to prevent unauthorized access, disclosure, modification or destruction of Data.

Data processing is carried out with the help of computers or computer tools, following the procedures and organizational modes closely related to the indicated purposes. In addition to the Webmaster, the Data may be accessible, in certain cases, to certain categories of persons in charge of the operation of the Website (administration, sales, marketing, legal department, system administration) or to external parties (such as third party technical service providers, messaging services, hosting providers, IT companies, communication agencies) designated, where applicable, as subcontractors by the Webmaster. An updated list of these parties may be requested at any time through the Webmaster's contact address.

- **Legal basis of the processing operation**

The Webmaster may process Personal Data relating to Users if one of the following conditions apply:

- Users have given their consent for one or several specific purposes. According to certain legislation, Webmaster may be authorized to process Personal Data until a potential Opt-Out of the Users, and until then, without having to depend on the Users consent. However, this condition does not apply when the processing of Personal Data is subject to the General Data Protection Regulation (GDPR) ;
- the supply of Data is necessary for the execution of an agreement with the User or for any pre-contractual obligation of the User;
- the processing is necessary to comply with a legal obligation to which the Webmaster is subject ;
- the processing is related to a task carried out in the public interest or in the exercise of official authority vested in the Webmaster ;
- the treatment is necessary to legitimate interests pursued by the Webmaster or a third party.

In any case, the Webmaster will gladly help you to clarify the specific legal basis which applies to the processing, and in particular if the provision of Personal Data is a legal or contractual requirement, or a requirement necessary to conclude a contract.

- **Place of treatment**

The Data is processed at the Webmaster's headquarters and in all other places where the parties responsible for the processing are located, in a strictly limited manner within the European Union.

Depending on the User's location, data transfers may involve the transfer of the User's Data to a European Union country other than his/her own. To learn more about the location of the processing of such transferred Data, Users may consult the section that contains details on the processing of Personal Data.

Users also have the right to know the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or created by two or more countries, such as the United Nations, as well as the security measures taken by the Webmaster to safeguard their Data.

If such a transfer takes place, Users may find out more by consulting the corresponding sections of this document or by contacting the Webmaster using the information provided in the contact section.

- **Data retention period**

Personal Data is processed and kept for as long as required for the purpose for which it was collected. Therefore:

- Personal Data collected pursuant to the execution of a contract between the Webmaster and the User must be kept until the full execution of the contract;
- Personal Data collected at fins from the Webmaster's legitimate interests must be kept for as long as necessary to achieve these purposes. Users can find specific information concerning the legitimate interests pursued by the Webmaster in the corresponding sections of this document or by contacting the Webmaster.

The Webmaster may be permitted to retain Personal Data longer whenever the User has consented to such processing, as long as such consent is not withdrawn. In addition, the Webmaster may be obliged to retain Personal Data for longer periods whenever this is required for the performance of a legal obligation or by order of an authority.

Once the retention period has expired, the Personal Data will be deleted. Therefore, the right of access, the right of deletion, the right of rectification and the right of data portability cannot be applied after the expiration of the retention period.

- **Purposes of processing**

User Data is to protect its rights and interests (or those of its Users or third parties), to detect any malicious or

fraudulent activity, as well as the following: Advertising, Registration and authentication, Contact Management and Message Sending, Content Performance and Functionality Testing (A/B Testing), Analytics, Website Monitoring, Platform Services and Hosting, show of content from external platforms, Access to Third Party Service Accounts, Beta Testing, Device Authorizations to access Personal Data, Interaction with Support and Feedback Platforms, Management of Support and Contact Requests and Social Functionality.

For precise information on the Personal Data used for each objective, the User may consult the section "More information on the processing of Personal Data".

- **Detailed information on the processing of Personal Data**

Personal Data is collected for the following purposes using several services:

- Access to Third Party Service Accounts
- Display of content from external platforms
- Analysis
- Authorizations of the device to access Personal Data
- Social Features
- Managing contacts and sending messages
- Management of support and contact requests
- Registration and authentication
- Interaction with support and feedback platforms
- Advertising
- Direct Marketing
- Platform services and hosting
- Website Monitoring
- Beta test
- Performance and functionality testing of content (A/B testing).

- **Other information about Personal Data**

- **Analysis and predictions based on User Data ("Profiling")**

The Webmaster may use the Personal and Use Data collected by the Website to create or update profiles User. This type of Data processing allows the Webmaster to evaluate the User's choices, preferences and behavior for the purposes described in the corresponding section of this document.

Users profiles can also be created through the use of automated tools such as algorithms, which may also be provided by third parties. To learn more about the activities of profiling carried out, Users can check the corresponding sections of this document.

The User always has the right to oppose this type of activity of profiling. To learn more about the User's rights and how to exercise them, the User is invited to consult the section of this document describing the User's rights.

The Service is not intended for children under the age of 13.

- **User Rights**

Users may exercise certain rights regarding their Data processed by the Webmaster.

In particular, Users have the right to do the following:

- withdraw their consent at any time. Users have the right to withdraw their consent if they have already

given their consent to the processing of their Personal Data.

- oppose the processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are added in the corresponding section below.
- access their Data. Users have the right to know whether the Data is being processed by the Webmaster, to obtain information on certain aspects of the processing and to obtain a copy of the Data being processed.
- check and get a rectification. Users have the right to check the accuracy of their Data and to request that it be updated or corrected.
- limit the processing of their Data. Users have the right, under certain conditions, to limit the processing of their Data. In this case, the Webmaster will only process their Data for storage purposes.
- have their Personal Data deleted or erased. Users have the right, under certain conditions, to obtain the deletion of their Data from the Webmaster.
- retrieve their Data and transfer them to another controller. Users have the right to retrieve their Data in a structured, commonly used and machine-readable format and, if technically possible, to transfer it to another controller without hindrance of any kind. This provision applies provided that the Data is processed by automated means and that the processing is based on the consent of the User, on a contract to which the User is a party or on pre-contractual obligations.
- file a complaint. Users have the right to lodge a complaint with their data protection authority.

- **Information concerning the right to object to the processing**

When Personal Data is processed in the public interest, in the exercise of an official authority devolved to the Webmaster or to fins of the legitimate interests pursued by the latter, Users may object to such processing by providing a reason related to their particular situation justifying this opposition.

Users should be aware, however, that if their Personal Data is processed for direct marketing, they may object to such processing at any time without any justification. To find out if the Webmaster processes Personal Data for direct marketing ends, Users may refer to the corresponding sections of this document.

- **How to exercise these rights**

Any request to exercise the User's rights may be addressed to the Webmaster using the contact details provided in this document. These requests can be exercised free of charge and will be studied by the Webmaster as soon as possible and always within one month.

Additional Information on Data Processing and Collection

- **Legal action**

The User's Personal Data may be used at fins by the Webmaster in legal proceedings or in steps that may lead to legal action resulting from improper use of the Website or related Services.

The User is aware that the Webmaster may be required to disclose Personal Data at the request of public authorities.

Additional information regarding the User's Personal Data

In addition to the information contained in this privacy policy, the Website may provide the User with additional information and background information regarding particular services or the collection and processing of Personal Data.

- **System logs and maintenance**

Regarding operating and maintenance, the Website and any third party service may collect files which record interactions with the Website (system logs) or use at this fin other Personal Data (such as IP address).

- **Information not included in this policy**

Further information regarding the collection or processing of Personal Data may be requested at any time from the Webmaster. Please consult the contact details figurant at the beginning of this document.

- **How are "Do Not Track" requests processed?**

The Website does not support "Do Not Track" requests.

Refer to the confidentialité policy of third party services to determine whether or not they accept "Do Not Track" requests.

- **Amendments of this privacy policy**

The Webmaster reserves the right to add modifications to the present privacy policy, at any time, by informing its Users on this page and possibly in this Website or - insofar as technically and legally possible - by sending a notification to Users via the contact details available to the Webmaster. It is strongly recommended to consult this page frequently, referring to the date of the last modification indicated at the bottom.

If the amendments influence the processing activities carried out on the basis of the User's consent, the Webmaster must obtain new consent from the User where necessary.