

# Krizma\_Privacy Policy

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## Who we are

Brandech built the Krizma app as a Free app. This SERVICE is provided by Brandech at no cost and is intended for use as is. Krizma has designated a Data Protection Officer and they can be reached by emailing [privacy@krizma.me](mailto:privacy@krizma.me).

## What information does Krizma process?

Krizma is a meeting place for adults, and we provide that service by operating a social network site offering users the opportunity to connect to our global community of users. By joining Krizma, you enter a legal agreement with us and we process your data in order to provide your service under the terms of that agreement. You can only become a member of krizma or use its features if you're aged 18 or over or the age of majority in the country in which you reside if that happens to be greater than 18.

To join the Krizma network you will have to complete our online registration form, where we may ask you to provide us with information about you such as your name, your email address, your gender, your date of birth, your location details. You also have the opportunity to provide other details about yourself, but these are optional. Because you control your user profile, these details are available to you at any time by accessing your "Profile" page, which gives you the chance to correct or update (other than your email address and gender) your information at any time by just logging in to Krizma. You can contact Krizma's Customer Support Team at our [Feedback Page](#) to change the gender on your profile and/or email address.

Please be careful about posting sensitive details about yourself on your Profile such as your religious denomination and health details. While you may voluntarily provide this information to us when you create your Profile, including your sexual preferences and ethnic background, there is no requirement to do so. Please remember that photographs or any video clips that you post on Krizma may reveal these kinds of sensitive personal data. Where you do upload and choose to tell us sensitive data about yourself, you are explicitly consenting to our processing your information and making this public to other users.

For safety and security and to ensure you have the best possible user experience, we require users to verify their accounts and might ask for your phone number for using video calls. We want to make sure you are not a robot! And we also want to avoid fake Krizma accounts being created which can be used for malicious activities and cyber crime – they threaten the Krizma network and spoil things for everyone. We use a third party provider for account verification who will keep your phone number for up to 90 days for fraud identification purposes across a range of online platforms and services like Krizma's. We collect and use your phone number on the basis of our legitimate interests identified above and for the prevention of fraud.

To enable Krizma to provide a free service, we process some limited data (demographics and location) to drive targeted advertising in our legitimate interest including sharing such data with advertising networks. We may also receive data indirectly from such advertising networks. You can stop this within Settings but you will still see adverts though they will be less relevant to you. Through your device's security settings you also have the option to prevent or limit device identifiers being shared with third party advertisers and what use is made of the device identifiers. If you would like more information about this practice and to know your choices about not having this information used by these companies, please send us a mail [privacy@krizma.me](mailto:privacy@krizma.me). Finally, we want to keep in touch with you to make sure you know about the great promotions and offers we have available. If you've told us it's OK, we will use your email address and phone number

to send you information on these. You can withdraw this consent at any time via Settings in the app or send us a mail at [privacy@krizma.me](mailto:privacy@krizma.me)

## What does Krizma collect about me if I use the mobile App?

Krizma offers you the opportunity to stay in touch with the friends and contacts you've made no matter where you are. You can do this by using your mobile phone or by downloading an application to your desktop that allows you to share your location with other users.

When you use your mobile application, we will collect information about WiFi access points as well as other location information about your longitude and latitude. That information helps us identify your physical location so that it can be displayed and shared with other members choosing to view "nearby" posts.

If you have enabled location services, but wish to turn it off, you can do so by the following methods:

1. iPhone app — settings, privacy, location services, Krizma
2. Android — profile, privacy, off

We, or our third-party advertising partners, may also collect and use your device identifier to serve relevant ads to you through the App. You can opt out of targeted advertising by (i) becoming payers and/ or (ii) opting not to share data with any partner platforms but still to receive advertisements.

## What is the legal basis that allows Krizma to use my data?

We are only permitted to use your data when we have a lawful basis to do so. The table below provides an overview of the legal bases that Badoo relies on to use your data. Where the legal basis is consent, you can withdraw consent at any time. Where the legal basis is legitimate interests, you have a right to object to our use of your data. We explain in the relevant sections in this privacy notice how you can withdraw consent or opt-out of certain data uses (where applicable).

Purpose for which data is used	Data	Legal basis
To provide you with the Krizma social networking service	Name, email address, gender date of birth, location	Contractual necessity
To facilitate networking opportunities on the Krizma application.	Optional information that you choose to provide in your profile, which may include information about your description, languages, genre, authors you like, photos etc.	Consent
To verify your identity and prevent fraud and to ensure the safety and security of users	Phone number	Legitimate interests – it is in our interests to ensure that accounts are not set up fraudulently For and to safeguard

		users of the site
To serve targeted advertisements to users of the site	Demographic and location information	Legitimate interests – it is in our legitimate interests to target advertisements so that users see relevant advertisements and to allow us to generate income from advertising revenue.
To send you marketing information about our offers and services	Email address and mobile phone number	Legitimate interests – it is in our legitimate interests to promote our products and services
To show “nearby” location information to you and other users of the site	Wifi access points and location data when you use the mobile app	Consent
To serve advertisements through the Krizma mobile app	Device ID	Legitimate interests – it is in our legitimate interests and the interests of third party advertisers to deliver advertisements to you to promote their products
To carry out analysis to help us improve the app	Log and usage data, including IP address, browser type, referring domain, pages accessed, mobile carrier and search terms	Legitimate interests – it is in our interests to analyse the way in which users are accessing and using our services so that we can further develop the app and improve the service
To respond to correspondence and queries that you submit to us	Email address and IP address	Legitimate interests – it is in our legitimate interests to respond to your queries to ensure that we provide a good service to users and troubleshoot problems

## How long will Krizma keep my data?

We keep your personal information only as long as we need it for legitimate business purposes (as set out above) and as permitted by applicable law. To protect the safety and security of our users on and off our services, we implement a safety retention window of three months following account deletion. During this period, account information will be retained although the account will of course not be visible on the services anymore.

In practice, we delete or anonymous your information upon deletion of your account (following the safety retention window), unless:

1. we must keep it to comply with applicable law (for instance, some “traffic data” is kept for one year to comply with statutory data retention obligations);
2. We must keep it to evidence our compliance with applicable law (for instance, records of consents to our Terms, Privacy Policy and other similar consents are kept for five years);
3. There is an outstanding issue, claim or dispute requiring us to keep the relevant information until it is resolved; or
4. The information must be kept for our legitimate business interests, such as fraud prevention and enhancing users’ safety and security. For example, information may need to be kept to prevent a user who was banned for unsafe behaviour or security incidents from opening a new account.

## **What information does Krizma collect about me if I’m under 18?**

Badoo does not knowingly collect any information about or market to children, minors or anyone under the age of majority. If we become aware that a child, minor or anyone under the age of 18 has registered with us and provided us with personal data, we will take steps to terminate that person’s registration and delete their Profile information from Krizma. If we do delete a Profile because you violated our no children rules, we may retain your email and IP address to ensure that you do not try to get around our rules by creating a new Profile.

## **What information does Krizma collect about my friends and contacts?**

You can choose to invite your friends to join Krizma to make sure that they also get the benefits of meeting new people who loves books. To make it easier to search and find friends on Krizma, users may search for other members by email address. If you want to invite your friends and contacts to Krizma, we will send an email invitation from Krizma in your name or you can send an SMS (if you use our Android or iPhone App) to your friends and contacts encouraging them to sign up to Krizma. If any of the individuals you have invited do not register within a few days, Krizma may occasionally send reminder emails on your behalf to those individuals. You can choose to invite all your friends or only a select few by simply unticking the names of those friends you do not wish to invite, but please remember you must not invite any children to join. You are responsible for ensuring that your friend has agreed to receiving a Krizma invite.

When you import your contacts, we store their name and email address or their mobile number so that we can automatically connect you and your friend. Krizma does not sell these email addresses or mobile numbers or use them to send any other communication besides email invitations. The friend may contact krizma to request the removal of their information from our database by sending us an email at [privacy@krizma.me](mailto:privacy@krizma.me). Any such request will only apply to addresses or mobile numbers we have at the time of the request and not to any addresses or mobile numbers that the member/user provides to us later.

## **Who does Krizma share information with?**

We may share aggregated information with such parties as Foursquare that includes your personal data (but which doesn’t identify you directly), together with other information including log data with third parties for industry analysis and demographic profiling and to deliver targeted advertising about other products and services.

We share your data with the following categories of third-parties:

1. Information technology companies (hardware and software) which provide services to support our products
2. Fraud prevention and anti-spam providers to protect the service from criminal activity
3. Moderators to monitor activity on the site/apps and approve content
4. Advertising partners, market places and providers of targeted advertising, including, but not limited to.
5. Law enforcement agencies, where we are required to by law or to protect the vital interests of a person

We ensure these parties must adhere to strict data protection and confidentiality provisions that are consistent with this Policy. Measures are taken to ensure that the data shared is non-attributable to the greatest extent possible.

In the event that krizma or any of its affiliates undergoes a business transition or change of ownership, such as a merger, acquisition by another company, re-organisation, or sale of all or a portion of its assets, or in the event of insolvency or administration, we may be required to disclose your personal data.

## **Your rights as an Krimza user.**

Under UK and EU law, you have the right to lodge a complaint with data protection regulators. Badoo has its main office in the UK and the Information Commissioners' Office (ICO) is our lead regulator. You can find out how to raise a concern with the ICO by visiting their website at [www.ico.org.uk](http://www.ico.org.uk). If you're within the EU, you may also get in touch with your local Data Protection Regulator who may liaise with the ICO on your behalf.

You have a number of rights under European Data Protection law if you are an EU citizen.

1. Right to be informed: what personal data an organisation is processing and why (this notice).
2. Right of access: you can request a copy of your data.
3. Right of rectification: if the data held is inaccurate, you have the right to have it corrected.
4. Right to erasure: you have the right to have your data deleted in certain circumstances.
5. Right to restrict processing: in limited circumstances, you have the right to request that processing is stopped but the data retained.
6. Right to data portability: you can request a copy of your data in a machine-readable form that can be transferred to another provider.
7. Right to object: in certain circumstances (including where data is processed on the basis of legitimate interests or for the purposes of marketing) you may object to that processing.
8. Rights related to automated decision making including profiling: there are several rights in this area where processing carried out on a solely automated basis results in a decision which

has legal or significant effects for the individual. In these circumstances your rights include the right to ensure that there is human intervention in the decision-making process.

If you want to exercise any of your rights listed above please visit Feedback Page or email us at [privacy@krizma.me](mailto:privacy@krizma.me).

## **How does Krimza protect my personal data?**

Krizma has implemented appropriate security measures to protect and prevent the loss, misuse, and alteration of the information under our control, including your personal data. Our technical experts at Krizma work hard to ensure your secure use of our site.

While we take reasonable precautions against possible security breaches of our website, member database and records, no website or internet transmission is completely secure and we cannot guarantee that unauthorised access, hacking, data loss, or other breaches will never occur. We urge you to take steps to keep your personal data safe (including your password) and to log out of your account after use. If you lose your password or give it out, or another service provider that you use suffers a data breach and you have used the same credentials with that service provider as you have with Krizma, your personal data may be compromised. If that happens, please report it to Support via our Feedback page or email at [privacy@krizma.me](mailto:privacy@krizma.me).

## **Where is my personal data kept?**

We want you to be able to access krizma wherever you happen to be in the world. To enable us to provide that service, we operate a global network of servers and third party service provider like hostgator. The hardware is located in third-party data centres but is owned by Krizma. Data collected by advertising partners may also be held outside the European Economic Area. We ensure that the data is adequately protected by ensuring that valid, legal mechanisms are in place such as: EU approved model clauses. If you want more information relating to the nature of the safeguards we have in place please email [privacy@krizma.me](mailto:privacy@krizma.me).

## **Does Krizma collect any other personal data about me?**

If you contact our Customer Support team via our [Feedback page](#) or sending us email, we will receive your email address, and may track your IP address as well as the information you send to us to help resolve your query. We will keep records of our communications with you, including any complaints that we receive from you about other users (and from other users about you) for 2 years after deletion of your account.

## **Does Krizma use my personal data for any other purpose?**

We may use material that you post on the open access areas of Krizma in advertising and promotional materials on our partner sites and partner products. We believe these uses are in line with our legitimate interests in enabling us to improve our site and better tailor your online experience to meet your needs. If we intend to do this, we will contact you for your prior approval.

From time to time we may run surveys for research purposes and we may contact you to find out if you would like to take part. Such surveys are optional and more information will be provided at the

point of contact. If you do not wish to be contacted to take part in a survey, please contact our Customer Support or send us email at [privacy@krizma.me](mailto:privacy@krizma.me) . We use your personal data to resolve disputes, troubleshoot problems and enforce our Term and conditions.

## What ‘cookies’ does Krizma use?

We collect information by placing cookies on your computer or mobile. A cookie is a piece of text stored on your computer or mobile by your web browser. They are basically a tool that stores information about website visits, recognises you and your preferences each time you visit Krizma, and ensures application functionality and enables us to provide the services our members request.

When you visit the publicly available sections of Krizma, a session ID cookie is placed on your computer that only lasts while you’re visiting. We also place persistent cookies (also known as local storage devices) on members’ computers, so that Krizma remembers them and makes their login experience faster and easier. We may use persistent tracking cookies on your mobile device, mainly for security protection purposes, such as to prevent phishers, scammers, unauthorised login attempts, and to help you access your hacked account. We do not use any information whilst you are logged off.

You may set your browser and your mobile settings to block cookies and local storage devices, but if you do so, you may not be able to access the features that Krizma offers.

Krizma’s use of cookies and local storage devices basically falls into the following categories:

- those that are strictly necessary to deliver the services and products you have requested.
- cookies related to the performance of krizma’s application, such as analytics that help us determine how our app. is performing and ensuring a smooth and trouble free experience for our users and visitors;
- cookies related to the functionality of Krizma’s application, such as remembering your preferences at login or your preferred language or allowing you to chat, add photos and instant message Krizma users;
- third party cookies which link to other social networks and which you request via social plugins; and
- cookies used to improve and target advertising to you based on what’s relevant to you, to improve reporting on any advertising campaign and to avoid showing you ads you have already seen.

Cookie Functions	Cookie Purposes
Analytics and research	krizma uses Google Analytics to collect information about how visitors use the krizma application. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including



	the number of visitors to the site, where visitors have come to the site from and the pages they visited. For more information about Google's privacy policy, please visit <a href="http://www.google.com/intl/en/policies/">http://www.google.com/intl/en/policies/</a>
Authentication	These cookies help us to identify our members so that when you're logged in, you can enjoy Krizma's experiences and various features, such as uploading photographs, chatting and can localise your experience. These cookies also help to remember who invited you to join Krizma.
Security and app integrity	We use cookies and other devices, such as CAPTCHAs, to help keep Krizma and our members safe and secure. These cookies do things like protect Krizma users from spam and fraud, by ensuring the safety of your personal data. We may use persistent cookies, which will help us to ensure we have identified the same device is logging in to the correct account. These types of cookies also help with our anti-spam measures and may help us to prevent phishers, scammers, unauthorised login attempts to your account and accessing any hacked accounts.
Site features and services	<p>These cookies and local storage devices provide the functionality that our Krizma members enjoy, such as uploading of photographs, chats, instant messaging, video call, your account settings and your request to have Krizma as your homepage or your search preference. We also use cookies to help provide experiences, such as links to other social media sites, social plugins and video content, including making it easier for you to share content between Krizma with your other favourite social networks.</p> <p>In some cases, the site feature you choose may allow a third party to place cookies or local storage devices on your computer. The third party who places cookies on your device is responsible for how they process their data and Krizma recommends that you read their privacy policies. Third parties who place cookies on your device when you use Krizma include, and we have included a link to their privacy policies:</p> <ul style="list-style-type: none"> <li>• Twitter, <a href="https://twitter.com/privacy">https://twitter.com/privacy</a></li> <li>• Facebook, <a href="https://en-gb.facebook.com/policy.php">https://en-gb.facebook.com/policy.php</a></li> <li>• LinkedIn, <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a></li> </ul>
Performance	We need to use certain cookies and local storage devices to ensure our members have the best possible experience, such as assisting with your navigation of our site, ensuring pages load up quickly and respond faster to your requests for Badoo services
Targeted advertising	We sometimes conduct advertising campaigns using DoubleClick, a Google company, who will also place cookies. To find out about DoubleClick cookies and how to control those cookies, go to: <a href="https://policies.google.com/technologies/ads">https://policies.google.com/technologies/ads</a> .

Our use of cookies and local share devices, including the specific cookie names, may change over time, but will generally fall into the above categories. We will notify you of any important changes to our use of cookies and local storage devices. If you would like to know more about cookies, including flash cookies/local storage devices, the following websites provide useful information:

## Changes to This Privacy Policy

Krizma may update our Privacy Policy from time to time. Thus, you are advised to review this page periodically for any changes. Krizma will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately after they are posted on this page.

## **Contact Us**

If you have any questions or suggestions about [my/our] Privacy Policy, do not hesitate to contact [privacy@krizma.me](mailto:privacy@krizma.me).

This Privacy Policy was last updated on 04.02.2019.