

PRIVACY NOTICE

For the purposes of this notice, the words 'we' / 'us' / 'our' are in reference to Passoa SAS. We are committed to safeguarding privacy and ensure that we process personal data in a fair and transparent manner. Personal data is data that relates to an identified or an identifiable natural person (the 'data subject'). We process personal data in accordance with Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, also known as the European General Data Protection Regulation (GDPR). This notice sets out how we will treat personal data.

WHAT INFORMATION DO WE COLLECT?

We may collect, store and use the following kinds of personal data:

- Name;
- Address;
- Email address;
- Date of birth;
- Phone number;
- IP addresses.

HOW DO WE USE PERSONAL DATA?

The purposes of these processing activities vary according to the services we provide. The purposes for which we collect data are either:

- preventing fraud;
- handling consumer contests
- communication with the Consumer, about possible wins in contests and competitions, and to maintain user accounts;
- sending our digital newsletter;
- sending various marketing emails;
- improving and analysing (the security of) our website;
- compliance with our legal (financial) obligations or to disclose data in connection with legal processes or litigation.

The processing of personal data is always either necessary in light of the performance of a contract with you as a consumer, based on your consent or necessary for the purposes of our legitimate business interests. For processing activities based on the consent, the Consumer has the right to withdraw his consent at any time. The withdrawal of consent will not affect the lawfulness of processing activities based on his consent before its withdrawal.

We process personal data in a manner that ensures appropriate security of the data. Where necessary, we conclude data processing agreements with third parties that process personal data on our behalf. We store personal data for as long as is necessary for the purposes for which they are processed.

TRANSFER OF PERSONAL DATA

We will not share personal data with third parties, unless:

- we are obliged to do so by law;
- transfer is necessary for the purpose of an agreement to which the Consumer is party, e.g. to inform the delivery service about the address where the prize needs to be delivered;
- such transfer is permitted in light of our legitimate interests, e.g. to prevent fraud;
- we have obtained consent to do so;
- It concerns our referral program.

CONSUMER RIGHTS

The Consumer has a right of access to the personal data we process about him. Additionally, he has the right to rectification of inaccurate personal data concerning him, the right to erasure, restriction of processing and data portability. If the Consumer want to exercise any of these rights, such request can be sent to info@passoa.com. We will respond to incoming requests within four weeks. Additionally, the Consumer has the right to lodge a complaint with the data protection authority of the country where he resides.

The Consumer needs to let us know if personal data which we hold needs to be corrected or updated by contacting us at info@passoa.com.

DISCLAIMER

This website may contain links to other websites for reference purposes only. We are not responsible for the content, privacy notices or practices of third-party websites in these circumstances. Please contact them directly for more information.

AMENDMENTS

We may update this notice from time-to-time by posting a new version on our website. The Consumer is advised to check this page regularly to ensure he is informed about any changes. We may also notify of changes to this notice by email.

ARE CHILDREN ALLOWED TO USE OUR WEBSITE?

We do not sell products or services for purchase by children. When entering a contest, the Consumer confirms he is aged 18 or over for EU, 21 or over for the UK and the USA.

COOKIE NOTICE COOKIES

WHAT ARE THEY?

A "cookie" is a piece of information, like a tag, that is stored on the computer, tablet or phone when visiting a website. It can help identify the device – like the PC or mobile phone – whenever the Consumer visits that website. Cookies are used by most major websites, including ours. To make the best use of our website, on whichever device the Consumer uses, he can make sure his web browser is set to accept cookies. We use analytical and functional cookies. Additionally, we use tracking cookies, only if we have obtained consent to the use of such cookies.

WHAT ARE COOKIES USED FOR?

We use cookies and some other data stored on devices to:

- give a better online experience;
- allow to set personal preferences;
- protect security;
- measure and improve our service, and;
- work with partners and measure marketing.

WHAT INFORMATION IS KEPT BY THE COOKIE?

A cookie will typically hold:

- the name of the website that it has come from;
- how long the cookie will stay on the device, and;
- a value – usually a randomly generated unique number.

THE COOKIES WE SET

We use the following categories of cookies on our website:

Category 1: Strictly necessary cookies

These cookies are essential in order to enable to move around the website and use its features. Without these cookies, services the Consumer has asked for such as remembering login details cannot be provided.

Category 2: Performance cookies

These cookies collect anonymous information on how people use our website. For example, we use Google Analytics cookies to help us understand how customers arrive at our website, browse or use our website and to highlight areas where we can improve, such as navigation, shopping experience and marketing campaigns. The data stored by these cookies never records personal details from which individual identity can be established.

Category 3: Functionality cookies

These cookies remember choices the Consumer makes such as the country the Consumer visits our website from, language preferences, and search parameters such as size, colour or product line. These can then be used to provide with an experience more appropriate to his selections and to make visits more personalised and pleasant. The information these cookies collect may be anonymised and they cannot track the browsing activity on other websites

Category 4: Targeting cookies or advertising cookies

These cookies collect information about browsing habits in order to make advertising more relevant to the Consumer and his interests. They are also used to limit the number of times he sees an advert as well as help measure the effectiveness of an advertising campaign. The cookies are usually placed by third party advertising networks. They remember the websites the Consumer visits and that information is shared with other parties such as advertisers. For example, we use third party companies to provide the Consumer with more personalized adverts when visiting other websites.

Category 5: Social media cookies

These cookies allow the Consumer to share what he has been doing on the website on social media networks such as Facebook and Twitter. These cookies are not within our control. Please refer to the respective privacy policies of the relevant social media networks to find out how their cookies work.

HOW LONG DO COOKIES STAY ON THE COMPUTER?

Session cookies only last until the Consumer closes the browser. They are not stored on the hard drive. They are usually used to track the pages that the Consumer visits so that information can be customized for him for that visit. Persistent cookies are stored on the hard drive until either the Consumer deletes them, or they reach their expiry date. These cookies may, for example, be used to remember preferences when the Consumer uses the site.

WHAT CAN THE CONSUMER DO TO MANAGE COOKIES STORED ON THE COMPUTER OR PHONE

He can accept or refuse cookies. Accepting cookies is usually the best way to make sure the Consumer gets the best from a website. Most PCs automatically accept them, but the Consumer can change the browser settings to restrict, block or delete cookies if he wants. Each browser is different, so check the 'Help' menu of the particular browser (or mobile phone's handset manual) to learn how to change the cookie preferences. Many browsers have universal privacy settings to choose from.

WHAT HAPPENS IF THE CONSUMER DOESN'T ACCEPT COOKIES?

If the Consumer declines cookies, some aspects of the site may not work on the device and the Consumer may not be able to access areas he wants on the website. For this reason we recommend to accept cookies.