

# Privacy Policy for the Antavo Loyalty Management Platform, Antavo Contest and antavo.com

**Antavo Limited takes your privacy seriously. We recognize that privacy is an important issue, so we design and operate our services with the protection of your privacy in mind. Please read the following to learn more about our Privacy Policy.**

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## Introduction

Welcome and thank you for visiting the Antavo website (“Site”). Antavo offers a hosted software as a service platform to Clients that have contracted with Antavo Limited for User data orchestration and engagement (“Clients”). Clients include our partners or resellers that offer our Services in connection or combination with services they provide to their customers, most often through their websites, webshops or social media pages. Antavo helps Clients understand their Users and provide their Users (“Users”) with personalised offers, campaigns, and loyalty programs. Our platform includes tools for creating reward clubs contests, quizzes, season campaigns and audience “segments” based on information about Users. These tools enable Clients to send relevant communications and promotions to certain their customers. Using the Loyalty Management Platform or the Contest Tools (defined below), Clients can configure and manage contests and loyalty programs on their websites, and offer and manage promotions and rewards.

In this Privacy Policy we refer to the Antavo contest and Loyalty platform and applications as our “Services”.

## Scope

This Policy only applies to Personal Data (as defined below) and other information collected by us from: (i) visitors to our Site and Clients that use our Services, and (ii) job applicants. While providing our Services to Clients, we may receive information related to the Clients’ Users, and other third parties. Our use of information, including Personal Data on behalf of our Clients is governed by our contract with that Client, our General Data Processing Terms and Conditions and the Client’s own privacy policies.

## Information tracking and usage

To the extent it is permitted by applicable laws, Antavo tracks and gathers certain information on this website that helps us to better understand our visitors’ needs related to our website and our services.

This Privacy Policy describes how we manage, process and store personal data submitted in the context of providing our services. “Personal Data” refers to any information relating to an identifiable individual or their personal identity.

Except as set forth in this Privacy Policy and our Terms and other published guidelines, we do **antavo** not release Personal Data about our clients or users without their permission. The use of information collected through the website shall be limited to the purpose of providing the services for which you have registered.

If you do not agree with these terms, then please do not provide any Personal Data to us. If you refuse or withdraw your consent, or if you choose not to provide us with any required Information, you will not be able to use our Services.

## Identity and contact details of the data processor

Personal data is collected on our website by Antavo Limited, a company registered under the laws of England and Wales under number 8046168 with the Companies House, and having its registered office at 107 Cheapside, 7th Floor, EC2V 6DN London, United Kingdom.

Please find our contact details further below in this Privacy Policy.

In connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company: In any such event, we will provide notice if your data is transferred and becomes subject to a different privacy policy.

## Data Protection Authority Declarations

Declarations on the automated processing of data have been registered with the Information Commissioner's Office (ICO) under number ZA140007. You may contact the Information Commissioner's Office (ICO) under the contact information provided here: <https://ico.org.uk/global/contact-us>

You retain the right to lodge any complaints on data protection with this supervisory authority.

## Consent

In subscribing to our Services or filling in a contact form on our website ([www.antavo.com](http://www.antavo.com), [www.contests.antavo.com](http://www.contests.antavo.com)) or other sites owned by Antavo, you agree and accept that we may gather, process, store and/or use the Personal Data submitted in accordance with the rules set forth below in this Privacy Policy regulation (in the following referred to as "Privacy Policy").

By giving your consent to us, you also retain the right to have your personal data rectified, to be forgotten and/or to be erased.

According to the applicable data protection regulations (GDPR) the Users need to consent to the data processing of Antavo described in this Privacy Policy. However only our Clients are in direct contact with the Users and Antavo is not in direct contact with them. Since the Services require the use of Personal Data of the Users, therefore the consent of the Users need to be obtained by the Client from the Client's Users for Antavo using the User's Personal Data according to this Privacy Policy before Antavo obtains the User's Personal Data. The obtainment of the User's consent is the responsibility and liability of the Client.

## Collected Personal Information

Antavo collects information from you in several ways when you use our Services. Please note that by the use of the Sites you grant Antavo permission to use, transfer, store, etc. your Personal Data under the following terms and purposes until revocation.

Antavo may collect all Personal Data you directly provide on our Sites and Antavo may also collect Personal Data from you as a User of our Services. When using our Services as a Client, please note that according to the applicable data protection regulations (GDPR) the Client is considered as the data controller and Antavo is considered as a data processor in regard of the processing of the Client's User personal data.

However by using or visiting the Sites some Personal Data may be automatically collected.

## Information Collected Through our Services

This section describes how we receive and use information collected through our Services on behalf of our Clients. For information about how we collect and use information collected through our Site, please see the "Information we Collect Through Our Site" section below.

Through our Services we may receive information that, alone or in combination with other information, could be used to identify an individual ("Personal Data"). We may receive information (including Personal Data) in the following ways:

- **Registration Data, Account Security**

We may receive Personal Data (first and last name, address, telephone number, email address, company's name, country/location) when a User registering an account for Antavo's Services. The Registration Data requested by Antavo enables the proper function and management of your Antavo account. By registering an account of the Site, you agree to:

- provide accurate, current and complete information on all the requested Registration Data
- update the Registration Data, and any other information you provide to Antavo, and to keep Registration Data accurate, current and complete
- ensure the security of your password; if you use a password on our Sites, you are responsible for keeping it confidential. Do not share it with any other person. If

you believe your password has been misused, we ask you for your immediate notification.

- accept all risks of unauthorized access to the Registration Data and any other information you provide to Antavo;
- take responsibility for all activity on your Antavo account,
- accepting full liability for all charges incurred by your Antavo account.

- **Information provided upon interaction with Clients**

We may receive Personal Data (first and last name, address, telephone number, email address, account number, location data, mobile phone unique device identifier and transaction and purchase history) when a User interacts with Clients' Applications, including when Users collect points, awards or achievements, check in to locations, subscribe to newsletters, submit postings, register for membership services, respond to polls or surveys, and register for sweepstakes, contests and other promotional opportunities. By using our services, the following data is collected and managed: log-on data and browsing data where you authorise it, order history, complaints, incidents, information on subscriptions and messages on our Site. Some data is collected automatically by reason of your activity on the site (see paragraph on cookies below). We also may receive Personal Data when Users visit a location or purchase products or services designed by Clients.

- **Third Party Applications**

Antavo may make third party applications available through our Services. Information received via third party applications includes personal information or information about the application itself. The information collected by Antavo when Users enable a third party application is handled under this Privacy Policy. Information collected by the third party application provider is governed by their privacy policies.

## How We Use Information Collected Through our Services

- **To Provide our Services**

We use the information that we obtain through our Services to provide our Services to our Clients, including to allow Clients to offer their Users specialized offers, campaigns, or loyalty rewards or to allow Users to receive rewards and other promotions and to participate in contests, promotions or surveys. Our use of information on behalf of our Clients is governed by our contract with that Client, our General Data Processing Terms and Conditions and the Client's own privacy policies.

- **Aggregated Data**

We may anonymize, de-identify and/or aggregate the information that we collect and use such anonymized, de-identified and/or aggregated data for our Clients' own internal business

purposes in connection with the use or better use of our Services, including but not limited to sharing anonymized and de-identified data with our current and prospective Clients, business partners, affiliates, agents and other third parties for commercial, statistical and market research purposes, for example to allow those parties to analyze patterns among groups of people, and conducting research on User demographics, interests and behavior.

## Information Collected Through Our Site

We collect the following information from you when you visit our Site, including from Site visitors who are interested in learning more about our Services or who are interested in applying for jobs with Antavo:

- **Personal Data that you provide to us**

We may ask you to provide Personal Data for various reasons. For example, when you request a demo of the Antavo platform, we ask you for contact information such as your name, email address, phone number, geographic and job information. On some pages of our Site you have the option to register for various Antavo services – e.g. newsletter, download of whitepapers, case studies – using data capture forms. These forms usually require your first name, your last name, company email address, company, job title, telephone number, your main goals regarding our services.

We may ask you for similar Information at other times, such as when you apply for a job through our Site or contact our customer support team. We also collect Personal Data that employees, contractors, or agents of our Clients provide to us when they register for access to the Antavo Services. The information we may collect includes demographic and contact details such as name, address, company name, location, email address, phone number. You may choose to provide additional non-mandatory information that enables us to provide a more personalised service. To the extent it is permitted by applicable laws, we may also directly contact you on the basis of the information you have provided in order to promote Antavo's products.

- **Client User Communications**

When you send email or other communications to Antavo, we may keep those communications in order to process your questions, respond to your requests and improve our Site. We may use your email address to communicate with you about our Services. Antavo may offer you to receive email updates either via email or another subscription service such as Facebook, blog or Twitter.

- **Information Collected Through Cookies, Server Logs and other Ad Technologies**

When you visit the Site or access Antavo Services, we may automatically collect information about you through server logs, cookies and other ad technologies. This information includes



your web request, the date and time of your web request, your interaction with a web service, your Internet Protocol address, your browser type, and the domain name of your Internet service provider. If you can be identified from this information, for example by combination with other pieces of information, then we will treat this information as Personal Data. Please see the information below to learn more about how we use cookies.

- **Other Types of Information Gathering**

Occasionally our website gathers visitors' data via temporary marketing activities such as seminars, free trial accounts, surveys, etc. Participation in these activities is on a voluntary basis, which allows you to decide whether to disclose any personal data or not. Such data may include contact information (e.g. name, email, phone number), demographic information (e.g. zip code, date of birth) or others. The data will be used to provide you with the service requested. Data gathered via surveys will be used for improving our website and services.

## How We Use Information Collected through our Site

- **To Communicate with You and to Improve our Services**

We use the information that we collect when you visit our Site to (i) respond to questions, comments or request for information from us; (ii) send offers; (iii) conduct research in our Site visitor's demographics, interests and behaviors; (iv) analyse website traffic patterns or otherwise monitor; or (v) improve our Site.

- **Aggregated Data**

We may anonymize, de-identify and/or aggregate the information that we collect through our Site and use such anonymized, de-identified and/or aggregated data for our business purposes, including but not limited to sharing anonymized and de-identified data with our current and prospective Clients, our business partners, affiliates, agents and other third parties, for commercial, statistical and market research purposes, for example to allow those parties to analyse patterns among groups of people.

- **Newsletter and marketing emails**

### Changing/Editing Personal data

Every email sent by Antavo allows you to change, edit or remove any information you provided to us at the time of registration for an Antavo service or the contact request on the website.

### Unsubscribe

An unsubscribe link should be included in every newsletter and marketing email sent to you. For those of you that have expressly opted in to receive our Antavo newsletter, you are easily able to unsubscribe by following the "unsubscribe" links included in every email.

## Email statistics

Without systematically doing so, we may analyse and track the various rates (for example: click, open, bounce rates) and the number of emails sent which you open to assess performance rates on your emailing campaigns.

- **Testimonials**

Antavo publishes a list of Customers & Testimonials on its site with information on our customers' names and job titles. Antavo undertakes to obtain the authorization of every customer before publishing any testimonial on its website.

If you wish to request that your testimonial or case study be removed you may do so by emailing us at <https://antavo.com/contact/> or [privacy@antavo.com](mailto:privacy@antavo.com).

- **Public forums**

The website offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them.

To request removal of the personal data you provided Antavo from our blog or community forum, contact us at <https://antavo.com/contact/>. Your request will be processed within thirty (30) days the latest.


In some cases, we may not be able to remove the requested information you provided Antavo, in which case we will let you know if we are unable to do so and why.

# Purpose of Processing and Legal Basis

## Purpose of Processing and Legal Basis through our Site

The principal purpose of collecting your Personal Data is to offer you a safe, optimum, efficient and personalised experience. To this end, you agree and accept that we may use your personal data to:

- provide our services and facilitate performance, including verifications relating to you;
- resolve any problems so as to improve the use of our site and services;
- personalise, assess, and improve our services, content and materials;
- analyse the volume and history of your use of our services;
- inform you about our services as well as our partners' services and/or promotional offers;
- prevent, detect and investigate any activities that are potentially prohibited, unlawful or contrary to good practice and ensure compliance with our terms of use and sending policy;
- comply with legal and regulatory obligations.

We use the Personal Data submitted to us only in accordance with the applicable data protection legislation. You may withdraw your consent any time by emailing us at <https://antavo.com/contact/> or [privacy@antavo.com](mailto:privacy@antavo.com). 

## Purpose of Processing and Legal Basis through our Services

The principal purpose of collecting your Personal Data is to offer you and your Users a safe, optimum, efficient and personalised experience in connection with our Services. To this end, you agree and accept that we may use your and your Users personal data to:

- provide our services and facilitate performance, including verifications relating to you;
- resolve any problems so as to improve the use of our site and services;
- personalize, assess, and improve our services, content and materials;
- analyse the volume and history of your use of our services;
- inform you about our services as well as our partners' services and/or promotional offers;
- prevent, detect and investigate any activities that are potentially prohibited, unlawful or contrary to good practice and ensure compliance with our terms of use and sending policy;
- comply with legal and regulatory obligations.

Please note that the legal ground for the processing of the personal data of our Clients is necessary for the performance of a contract to which the Client (data subject) is party or in order to take steps at the request of the Client (data subject) prior to entering into a contract, or processing is necessary for compliance with a legal obligation to which Antavo is subject to; or the Client (data subject) has given consent to the processing of his or her personal data for one or more specific purposes. Accordingly the Client's personality data will be processed until the termination of the contract between the parties, or if there are the legitimate interests pursued by Antavo than the personal data of the Client will be kept and processed until the legitimate interests prevails. In case of the personal data processing is necessary for compliance with a legal obligation, than the personal data will be processed until the legal obligation which allows and obliges Antavo to process the data. If the processing is based on the consent of the Client, then the data processing will be maintained until the withdrawal of the consent by the Client.

The legal ground for processing of the personal data of our Clients' Users is that the User (data subject) has given consent to the processing of his or her personal data for one or more specific purposes. In this case the data processing will be performed until the withdrawal of the consent by the User, or the termination of the agreement between the Client and Antavo.

## Disclosure of Data Collected Through the Services or Site

We share information that we collect, including Personal Data, as described below:

- **Clients**

Personal Data of a Client's User will be analysed and provided back to the Client in order to **antavo** perform the Services.

- **Vendors and Services Providers**

To third party vendors and service providers to perform certain functions on our behalf, such as hosting specific portions of the Service, maintaining databases, helping us collect job applications, delivering content, sending emails on behalf of our Users and for our own marketing communications, administering content, mailing information, processing payments or otherwise operating the Services or the Site.

- **Partners and Resellers**

To partners and resellers who provide our Services in connection or in combination with other services they provide, for example Antavo can provide Personal Data and/or aggregated data to those partners and resellers to enable them to provide Services and for monitoring performance metrics.

- **Merger, Acquisition or Financing**

To a successor or affiliate if we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, as part of that transaction along with other assets.

- **As Required by Law**

To satisfy applicable law, regulation, legal process or lawful government request of any country, or to protect the rights, property or safety of Antavo, its users or the public, or to enforce Antavo's Terms and Conditions. Antavo will inform you immediately, to the extent we are legally authorized to do so, in case of any application or order originating from an administrative or judicial authority relating to your personal data.

Antavo also may share your Information when we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of Antavo.

## List of Data Subprocessors

For processing information collected through our Site

| Third Party Service/Vendor or | Data processed | Purpose | Entity Country | Privacy Policy |
|-------------------------------|----------------|---------|----------------|----------------|
|                               |                |         |                |                |

|                             |  |  |             |  |
|-----------------------------|--|--|-------------|--|
| Mailchimp                   | Name, email address  | Newsletter   | USA         | <a href="https://www.intuit.com/privacy/statement/">https://www.intuit.com/privacy/statement/</a>  |
| Wordpress (Automattic Inc.) | Name, email address  | Sending requested marketing materials (case study, ebook)  | USA         | <a href="https://wordpress.org/about/privacy/">https://wordpress.org/about/privacy/</a><br><a href="https://automattic.com/privacy/">https://automattic.com/privacy/</a> |
| Recruitee                   | Name, email address, phone number, CV, cover letter, answers to screening questions  | Recruitment (career.antavo.com)  | Netherlands | <a href="https://recruitee.com/privacy-policy">https://recruitee.com/privacy-policy</a>  |
| Hubspot                     | Name, email address  | CRM  | USA         | <a href="https://legal.hubspot.com/privacy-policy">https://legal.hubspot.com/privacy-policy</a>  |
| Intercom                    | Name, email address, User ID, phone number, signed up, last seen, company, company type, jobtitle, number of employees, country, language, plan type | Contest Software CRM + Support (contests.antavo.com/platform.antavo.com)   | USA         | <a href="https://www.intercom.com/legal/terms-and-policies">https://www.intercom.com/legal/terms-and-policies</a>  |
| Zendesk                     | Name, email address, language, timezone  | Loyalty Software Support ( <a href="https://antavo.atlassian.net/service/customer/user/login">https://antavo.atlassian.net/service/customer/user/login</a> ) | USA         | <a href="https://www.zendesk.com/company/agreements-and-terms/privacy-policy/">https://www.zendesk.com/company/agreements-and-terms/privacy-policy/</a>                  |
| Hubspot                     | Name, email address  | Newsletter   | USA         | <a href="https://legal.hubspot.com/privacy-policy">https://legal.hubspot.com/privacy-policy</a>  |

## For processing information collected through our Services

| Third Party Service/Vendor | Data processed  | Purpose            | Entity Country | Privacy Policy  |
|----------------------------|---|--------------------|----------------|---|
| Listrak                    | demographic data and contact, transactional and behavioral info | Personalized email | USA            | <a href="https://www.listrak.com/privacy-and-terms/privacy-policy">https://www.listrak.com/privacy-and-terms/privacy-policy</a> |

|                 |   |                                    |         |   |
|-----------------|---|------------------------------------|---------|---|
| Emarsys         | demographic data and contact, transactional and behavioral info | Personalised email, marketing tool | Austria | <a href="https://emarsys.com/">https://emarsys.com/</a>   |
| Responsys       | demographic data and contact, transactional and behavioral info | Personalised email                 | USA     | <a href="https://www.oracle.com/legal/privacy/advertising-privacy-policy.html">https://www.oracle.com/legal/privacy/advertising-privacy-policy.html</a> |
| Teradata        | demographic data and contact, transactional and behavioral info | Personalised email, CRM            | USA     | <a href="https://www.teradata.com/Legal/Teradata-Privacy-Policy.pdf">https://www.teradata.com/Legal/Teradata-Privacy-Policy.pdf</a>                     |
| Dotmailer       | demographic data and contact, transactional and behavioral info | Personalised email                 | UK      | <a href="https://dotdigital.com/terms/privacy-policy/">https://dotdigital.com/terms/privacy-policy/</a>   |
| InxMail         | demographic data and contact, transactional and behavioral info | Personalised email                 | Germany | <a href="https://www.inxmail.com/data-conditions">https://www.inxmail.com/data-conditions</a>   |
| Segment         | demographic data and contact, transactional and behavioral info | data segmentation and transferring | USA     | <a href="https://segment.com/legal/privacy/">https://segment.com/legal/privacy/</a>   |
| ORO CRM         | demographic data and contact, transactional and behavioral info | Personalized email                 | USA     | <a href="http://oroinc.com/privacy-policy">http://oroinc.com/privacy-policy</a>   |
| Bronto (Oracle) | demographic data and contact, transactional and behavioral info | Personalised email, marketing tool | USA     | <a href="https://www.oracle.com/legal/privacy/privacy-policy.html">https://www.oracle.com/legal/privacy/privacy-policy.html</a>                         |
| Sailthru        | demographic data and contact, transactional and behavioral info | Personalised email                 | USA     | <a href="https://www.sailthru.com/legal/privacy-statement/">https://www.sailthru.com/legal/privacy-statement/</a>                                       |
| Pure360         | demographic data and contact, transactional and behavioral info | Reseller agency                    | UK      | <a href="https://www.pure360.com/privacy/">https://www.pure360.com/privacy/</a>   |
| MadMimi         | demographic data and contact, transactional and behavioral info | Personalised email                 | UK      | <a href="https://madmimi.com/legal/terms">https://madmimi.com/legal/terms</a>   |
| ActiveCampaign  | demographic data and contact, transactional and behavioral info | Personalised email                 | USA     | <a href="https://www.activecampaign.com/legal/privacy-policy">https://www.activecampaign.com/legal/privacy-policy</a>                                   |
| Mailchimp       | demographic data and contact, transactional and behavioral info | Personalised email                 | USA     | <a href="https://www.intuit.com/privacy/statement/">https://www.intuit.com/privacy/statement/</a>   |
| AWeber          | demographic data and contact, transactional and behavioral info | Personalised email                 | USA     | <a href="https://www.aweber.com/privacy.htm">https://www.aweber.com/privacy.htm</a>   |

|           |   |                    |     |   |
|-----------|---|--------------------|-----|---|
| Benchmark | demographic data and contact, transactional and behavioral info | Personalised email | USA | <a href="https://www.benchmarkemail.com/privacy-policy/">https://www.benchmarkemail.com/privacy-policy/</a> |
|-----------|---|--------------------|-----|---|

## Links to Other Websites

Our Site may contain links to other websites not operated or controlled by Antavo (“Third Party Sites”). The privacy practices described in this Privacy Policy do not apply to Third Party Sites. By providing these links we do not imply that we endorse or have revised these sites. Please contact those sites directly for information on their privacy practices and policies.

## Security

Within the framework of its services, Antavo attributes the very highest importance to the security and integrity of its customers’ personal data.

Thus and in accordance with the GDPR, Antavo undertakes to take all pertinent precautions in order to preserve the security of the data and, in particular, to protect them against any accidental or unlawful destruction, accidental loss, corruption, unauthorised circulation or access, as well as against any other form of unlawful processing or disclosure to unauthorised persons. To this end, Antavo implements industry standard security measures to protect personal data from unauthorised disclosure.

In order to avoid in particular all unauthorised access, to guarantee accuracy and the proper use of the data, Antavo has put the appropriate electronic, physical and managerial procedures in place with a view to safeguarding and preserving the data gathered through its services.

Notwithstanding this, there is no absolute safety from hackers. That is why in the event a breach of security were to affect you, Antavo undertakes to inform you thereof without undue delay and to use its best efforts to take all possible measures to neutralise the intrusion and minimise the impacts. Should you suffer any loss by reason of the exploitation by a third party of a security breach, Antavo undertakes to provide you with every assistance necessary so you are able to assert your rights.

You should keep in mind that any user, customer or hacker who discovers and takes advantage of a breach in security renders them liable to criminal prosecution and that Antavo will take all measures, including filing a complaint and/or bringing court action, to preserve the data and the rights of its users and of itself and to limit the impacts.

## Location of data storage and transfers

The host servers on which Antavo processes and stores its databases are located exclusively within the European Union.

## Retention

Antavo collects your personal data based on your prior consent given to us as well as information about how and when you use our services and we retain this data in active databases, log files or other types of files so long as you use our services.

Antavo only stores your data for the time needed to provide to you our services (unless otherwise required by law). You are able to access your personal data for as long as you hold an active service with us and for a period that varies depending on the type of data concerned. Your event data (statistics, for example), will be deleted every 12 months during active use of your account. Your message content will be stored for a period of 12 months. Other data may be deleted at any time during active use of your account in accordance with the provisions set forth above in this Privacy Policy.

## Children Under 16

Our Services and Site are not directed at children under 16 years of age, and we do not knowingly collect or receive Personal Data from them. Our Clients are responsible for complying with applicable law regarding the collection of information from children who may be under the age of 16. If we learn that we have received Personal Data from a child who is under 16, we will delete the data. If you believe that we have received Personal Data from a child under the age of 16, you may contact us at [privacy@antavo.com](mailto:privacy@antavo.com).

## EU Data Subjects

In accordance with the UK Data Protection Act 1998 and the European General Data Protection Regulation 2016/679 (GDPR) this section applies if you are an EU data subject (for these purposes, reference to the EU also includes the European Economic Area countries of Iceland, Liechtenstein and Norway and, where applicable, Switzerland).

Antavo is the data controller for processing Personal Data provided to Antavo through the Site, but we act strictly as data processor on behalf of Clients for Personal Data that we process through the Services, as described under the "Information Collected Through our Services" section above.



We rely on the following legal bases for processing your Personal Data:

- Processing of your Personal Data that you provide to us when you request a demo of the Antavo platform or when you otherwise send inquiries about our Services is necessary to respond to or implement your request prior to entering into a contract with us.
- When you apply for employment through our Site, processing of your contact details and data about your employment history and education (as needed to evaluate your job application, to conduct job interviews, and as is otherwise needed for recruitment) is necessary to respond to your request to process your application for employment. If you do not provide this data, we will not be able to process the application that you send through our Site.
- We use account-related data provided by Clients to set up accounts for the Client and the Client's users in the Antavo platform and to administer and support those accounts (such as usernames, email address, billing information), provide you with access to the Services, contact you regarding your use of the Services or to notify you of important changes to the Services. Such use is necessary for the performance of the contract between you and us.
- We will send you information by email on our new products or services or other promotions only with your consent. If you do not provide us with your consent to the processing of your Personal Data for this purpose, we will not send you this information. You have the right to withdraw your consent at any time as described below.
- Our use of data relating to your use of the Site and/or the Services, described above, is necessary for our legitimate interests in understanding how the Site and the Services are being used by you, to improve your experience on it and our service offerings. We have also a legitimate interest in aggregating and/or anonymizing the information that we collect through our Site and/or the Services and using this information for our business purposes, as described above. When we process your Personal Data for our legitimate interests, we make sure to consider and balance any potential impact on you, and your rights under data protection laws. Our legitimate business interests do not automatically override your interests – we will not use your Personal Data for activities where our interests are overridden by the impact on you, unless we have your consent or those activities are otherwise required or permitted to by law. You have the right to object to processing that is based on our legitimate interests, as further described below.

Subject to applicable law, and provided that, if you are a Client's User, Antavo may refer you to a particular Client where processing of Personal Data has taken place pursuant to our contract with a Client, you have the following rights in relation to your Personal Data:

- Right of access

If you ask us, we will confirm whether we are processing your Personal Data and, if so, provide you with a copy of that Personal Data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

- Right to rectification

If your Personal Data is inaccurate or incomplete, you are entitled to have it rectified or completed. If we have shared your Personal Data with others, we will tell them about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.

- Right to erasure

You may ask us to delete or remove your Personal Data and we will do so in some circumstances, such as where we no longer need it (we may not delete your data when other interests outweigh your right to deletion, for example if we are required by law to keep it). If we have shared your data with others, we will tell them about the erasure where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.

- Right to restrict processing

You may ask us to restrict or 'block' the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of that Personal Data or object to us processing it. We will tell you before we lift any restriction on processing. If we have shared your Personal Data with others, we will tell them about the restriction where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.

- Right to data portability

Effective 25 May 2018, you have the right to obtain your Personal Data from us that you consented to give us or that is necessary to perform a contract with you. We will give you your Personal Data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.

- Right to object

You may ask us at any time to stop processing your Personal Data, and we will do so if we are processing your Personal Data for direct marketing and otherwise. However, if we are relying on

a legitimate interest to process your Personal Data and we demonstrate compelling legitimate **antavo** grounds for the processing we may continue.

- Rights in relation to automated decision-making and profiling

You have the right to be free from decisions based solely on automated processing of your Personal Data, including profiling, which produce a significant legal effect on you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us, or with your explicit consent.

- Right to withdraw consent

If we rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time. Your withdrawal of consent will not affect apply to data that was processed prior to our receipt of your withdrawal of consent.

- Rights concerning automated decision-making

Antavo may performing automated decision-making with the personal data of the Users. Automated decision-making means a decision making which is based on the Users personal information and the decision is made solely through automatized data processing. The automated decision-making by Antavo may be performed concerning promotions or other campaigns of Antavo on the Clients Sites. Based on the personal information or activity of the User, Antavo may decide to include or exclude the User from a promotion or a campaign or put the User in a more or a less beneficial position.

The User (1) has the right not to be subject to the automated decision-making based solely on automated processing, and (2) has the right to obtain human intervention on the part of the controller, and also (3) may to express his or her point of view and (4) may contest the decision.

- Right to lodge a complaint with the data protection authority

If you have a concern about our privacy practices, including the way we have handled your Personal Data, you can report it to the data protection authority that is authorized to hear those concerns.

- Right to an effective judicial remedy against a controller or processor

If you have a concern about our privacy practices, including the way we have handled your Personal Data, you have the right to an effective judicial remedy. Such proceedings against us shall be brought before the courts England, or such proceedings may be brought before the courts of the Member State where the you, as the data subject has his or her habitual residence.

\*You may exercise your rights by contacting us as indicated under “Contact Us”.

## Use of Cookies

Antavo uses cookies and similar technologies on the Site. A cookie is a piece of information sent to your browser from a website and stored on your computer’s hard drive. Cookies can help a website like ours recognize repeat users and allow a website to track web usage behavior. Cookies work by assigning a number to the user that has no meaning outside of the assigning website. For more information on the types of Cookies we use, please, read our [Cookie Policy](#).

## Changes to this Privacy Policy

We may change this Privacy Policy at any time. We will post all changes to this Privacy Policy on this page and will indicate at the top of the page the modified policy’s effective date. We therefore encourage you to refer to this page on an ongoing basis so that you are aware of our current privacy policy. We will notify you about the changes prior to the changes taking effect. By continuing to use the Site and/or the Services or providing us with information following such a replacement Policy being uploaded, you agree that you will be deemed to have agreed to be bound by the Privacy Policy as changed. If you indicate, that you don’t want to accept the changes, the modification shall not be considered acceptable. In this case, Antavo may suspend the Services provided to you with immediate effect. Where the modification is due to a change in law, you may not object the modification.

## Contact Information

If you have any questions or suggestions regarding this Privacy Policy, please contact us at the following email address: [privacy@antavo.com](mailto:privacy@antavo.com), or send postal mail to:

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107 Cheapside, 9th Floor  
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Web: [www.antavo.com](http://www.antavo.com)  
Representative of the company: Attila Kecsmar

Antavo’s Data Protection Officer:  
Jozsef Juhasz  
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## Version History

- 27 November 2015
- 7 May 2018