

# SFEDI®AWARDS

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### We Care About Privacy

SFEDI Awards is committed to protecting your privacy and to comply with applicable data protection and privacy laws. We hope that this Privacy Policy ("Policy") helps you understand what kind of information we collect in connection with our products and services and how we process such information. Throughout this Policy the term "personal data" means information relating to an identified or identifiable individual (i.e. a natural person).

This Policy applies to personal data collected in connection with products and services offered by SFEDI Awards.

We may provide additional or amending privacy information in connection with a particular SFEDI Awards product or service. Such information prevails over this Policy to the extent of any conflict. Our products or services may contain links to other companies' websites and other third party services that have privacy policies of their own. We recommend that you read the privacy policies of such services. SFEDI Awards is not responsible for the privacy practices or contents of any such services.

By using this website and/or by submitting personal data to SFEDI Awards, you express your agreement to the processing of your personal data in the manner provided in this Policy. If you do not agree with this Policy, please do not use this website or provide SFEDI Awards with your personal data.

### The Data we Collect

We collect your personal data typically when you make a purchase, use or register into our services, enter into a sales promotion or a campaign or otherwise interact with us. We endeavour to collect personal data only with your knowledge or consent. Below are examples of the categories of data collected.

#### **Technical Information**

For the most part, you may visit our websites or use our products or services without having to tell us who you are. However, certain technical information is normally collected as a standard part of your use of our services. Such information includes, for example, your IP-address, access times, the website you linked from, pages you visit, the links you use, the adbanners and other content you viewed, information about your devices and other such technical information your browser provides us with or as may be otherwise collected in connection with certain products and services. When you use our services or otherwise interact with us over telecommunications networks, certain additional information, such as your mobile subscription number, may be transmitted to us by the telecommunications operator as a standard part of that communication. Please also see the section "Use of Cookies and Web Beacons" below.

#### **Use of Cookies and Web Beacons**

From time to time when you visit a SFEDI Awards website, information may be placed on your computer to allow us to recognize your computer. This information is commonly in the form of a textfile known as a "cookie". Cookies are small pieces of data stored on your computer's hard drive, rather than on the website. Typically, they enable collection of certain information about your computer, including your internet protocol (IP) address, your computer's operating system, your browser type and the address of any referring sites. Our use of cookies is intended to provide benefits to you, such as eliminating the need for you to enter your password frequently during a session or the need to re-enter items you place in a shopping cart if you do not finish a transaction in a single visit.

Cookies are also used for website traffic analysis and anonymous demographic profiling so that we may improve our services.

#### **Use of Cookies**

Any cookies that are used on this site are used on a per session basis or used to maintain user preferences. Cookies are not shared with any third parties.

Cookie Name Description

bp-activity-oldestpage On the Activity page, rather than the list of activity being paginated, it has a "load more" button. This cookie remembers what page of activity the "load more" is on. wp-settings-\*, wordpress-\* WordPress Cookies

This website uses the CMS/Blogging platform WordPress which provides the majority of its functionality. WordPress uses various cookies to maintain essential functionality without which the site would not run properly. This affects Users (contributors, admins and authors, who are required to log in) and Commenters. The details of these cookies can be found here.

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Cookie Control: When you click "I'm happy with this..." on the Cookie Control user interface, a cookie is set in order to remember your preference. These cookies are set only after the user has given consent to us to use cookies.

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#### **Google Analytics**

We use Google Analytics to monitor traffic levels, search queries and visits to this website. Google Analytics stores IP address anonymously on its servers in the US, and neither SFEDI Awards or Google associate your IP address with any personally identifiable information.

These cookies enable Google to determine whether you are a return visitor to the site, and to track the pages that you visit during your session.

These cookies are set only after the user has given consent to us to use cookies.

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utmz	PHPSESSID

Not a tracking cookie. Only contains session information. k,

guest\_id

Twitter cookies. These cookies are set only after the user has given consent to us to use cookies.

SFEDI Awards may use so called web beacons (or "pixel tags") in connection with some websites. However, we do not use them to identify individual users personally. Web beacons are typically graphic images that are placed on a website and they are used to count visitors to a website and/or to access certain cookies. This information is used to improve our services. Web beacons do not typically collect any other information than what your browser provides us with as a standard part of any internet communication. If you turn off cookies, the web beacon will no longer be able to track your specific activity. The web beacon may, however, continue to collect information of visits from your IP- address, but such information will no longer be unique.

If you do not wish to receive cookies, or want to be notified before they are placed, you may set your web browser to do so, if your browser so permits. Please understand that if cookies are turned off, you may not be able to view certain parts of this site that may enhance your visit. Some of our business partners whose content is linked to or from this site may also use cookies or web beacons. However, we have no access to or control over these cookies.

### Information You Provide Us With

When you register for our services, make a purchase, enter a sales promotion or otherwise interact with us, we may ask you to provide us with information such as your name, email address, street address, as well as user names, passwords and other such credentials that are used to authenticate users and to validate their actions or that may be needed to provide you with the products and services you have requested or to communicate with you.

We may collect demographic information, for example, your age, gender, postal code and language preferences.

We may also collect other information you provide, such as your consents, preferences and feedback, information relating to your devices and other such information you provide us with. Please note that certain nonidentifiable information collected from you may become personally identifiable when you provide us with your personal data. We may also obtain, in accordance with applicable law, some personal data from list-rental companies and other such publicly available sources. Some of our services may allow you to submit information about other people, for example, if you make an order for a product that you wish us to send directly to another recipient.

#### Your transactions with us

We collect or ask for information relating to your purchase and/or use of our products and/or services and your other interactions with us. Such information may include, for example, details of the queries or requests you have made, the products and services provided (including delivery details), financial details (including payments made, billing address, credit checks and other such financial information), details of agreements between you and SFEDI Awards, records of contacts and communications, information and details relating to the content you have provided us with and other such transactional information. We may, in accordance with applicable law, record your communication with our customer care or with other such contact points. Certain services may involve the use of your location data. However, use of your location data for such services is subject to your consent.

We do not store credit/debit card details, that is name, credit card numbers, authorization codes, expiry dates or any other credit/debit card information. Credit/debit card details are captured only for the purposes of credit/debit card processing. Such information is destroyed after a credit/debit card transaction ends.

### What we Use Personal Data For

SFEDI Awards processes your personal data for the purposes described in this Policy and/or any additional service specific privacy information. Please note that one or more purposes may apply simultaneously.

#### **Provision of products and services**

We may use your personal data to fulfill your requests, process your order or as otherwise may be necessary to perform or enforce the contract between you and SFEDI Awards, to ensure the functionality and security of our products and services, to identify you and to prevent and investigate fraud and other misuses.

#### **Development of products and services**

We may use your personal data to develop our products and/or services. However, for the most part we only use aggregate and statistical information in the development of our products and services. We may also use your personal data to personalize our offering and to provide you with service more relevant to you, for example, to make recommendations and to display customized content and advertising in our websites. We may combine personal data collected in connection with your use of a particular SFEDI Awards product and/or service with other personal data we may hold about you, except where such personal data was collected for a different purpose. We may create aggregate and statistical information based on your personal data.

#### Communicating with you and marketing

We may use your personal data to communicate with you, for example, to provide information relating to our products and/or services you are using or to contact you for customer satisfaction queries. We may use your personal data for marketing or research purposes, for example, to conduct market research and we may, in accordance with applicable law, contact you to inform you of new products, services or promotions we may offer. Also, some of our products and services may be used to promote products and services of other companies. However, SFEDI Awards does not disclose your personal data to such companies or any other company for marketing purposes without your prior consent.

## **Sharing Your Personal Data**

Generally, we do not sell, lease, rent or otherwise disclose your personal data to third parties unless otherwise stated below.

### Consent

We may share your personal data if we have your consent to do so. Some services may include sharing your personal data with other users of the service, for example services where users publish their own content or SFEDI Awards user communities.

#### SFEDI Awards companies and authorised third parties

We may share your personal data with other SFEDI Awards companies or authorized third parties who process personal data for SFEDI Awards for the purposes described in this Policy. Such parties are not permitted to use your personal data for other purposes, and we require them to act consistently with this Policy and to use appropriate security measures to protect your personal data.

#### International transfers

Our products and services may be provided using resources and servers located in various countries around the world. Therefore your personal data may be transferred across international borders outside the country where you use our services, including to countries outside the European Economic Area (EEA) that do not have laws providing specific protection for personal data or that have different legal rules on data protection, for example, the United States of America. In such cases we take steps to ensure that there is a legal basis for such a transfer and that adequate protection for your personal data is provided as required by applicable law, for example, by using standard agreements approved by relevant authorities (where necessary) and by requiring the use of other appropriate technical and organizational information security measures

#### **Mandatory disclosures**

We may be obligated by mandatory law to disclose your personal data to certain authorities or other third parties, for example, to law enforcement agencies in the countries where we or third parties acting on our behalf operate. We may also disclose and otherwise process your personal data in accordance with applicable law to defend SFEDI Awards's legitimate interests, for example, in civil or criminal legal proceedings.

#### **Mergers and Acquisitions**

If we decide to sell, buy, merge or otherwise reorganise our businesses in certain countries, this may involve us disclosing personal data to prospective or actual purchasers and their advisers, or receiving personal data from sellers and their advisers.

## **Data Quality**

We take reasonable steps to keep the personal data we possess accurate and up-to-date and to delete out of date or otherwise incorrect or unnecessary personal data.

As certain SFEDI Awards products and services may allow you to manage your profile, we encourage you to access your personal data from time to time to ensure that it is correct and up-to-date. Please remember that it is your responsibility to provide us with correct details as well as to update the personal data you have provided us with in case of any changes.

## Security

While there are always risks associated with providing personal data, whether in person, by phone, via the internet or otherwise, and no technology is completely safe or "tamper" or "hacker" proof, SFEDI Awards takes appropriate technical and organizational information security measures to prevent and minimize such risks.

Such measures include, where appropriate, the use of firewalls, secure server facilities, encryption, implementing proper access rights management systems and processes, careful selection of processors and other technically and commercially reasonable measures to provide appropriate protection for your personal data against unauthorized use or disclosure. Where appropriate, we may also take backup copies and use other such means to prevent accidental damage or destruction to your personal data. If a particular part of a SFEDI Awards website supports online transactions, we will use an industry standard security measure, such as the one available through "Secure Sockets Layer" ("SSL"), to protect the confidentiality and security of online transactions.

## Your Rights

In case you wish to know what personal data we hold about you or you wish to replenish, rectify, anonymize or delete any incomplete, incorrect or outdated personal data, or you wish us to cease processing your personal data for the purpose of sending promotional materials or direct marketing or for the performance of market research or on other compelling legal grounds, you may, as appropriate and in accordance with applicable law, exercise such rights by contacting us through the contact points referred to below. In some cases, especially if you wish us to delete or cease the processing of your personal data, this may also mean that we may not be able to continue to provide the services to you. We encourage you to use available profile management tools for the above purposes as such tools often provide you with direct access to your personal data and allow you to effectively manage it.

Please note that SFEDI Awards may need to identify you and to ask for additional information in order to be able to fulfill your above request. Please also note that applicable law may contain restrictions and other provisions that relate to your above rights.

#### The Controller of Your Personal Data and Contact Details

SFEDI® shall be the controller of your personal data

In matters pertaining to SFEDI Awards' privacy practices you may also contact us at: SFEDI

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