# Fanseat's data protection principles

# **Privacy notice**

Fanseat is part of Spring Media Digital ventures AB ("Spring Media"), a Swedish media company. Spring Media processes personal data for the purpose described on the Spring Media's Data Protection Principles.

We protect our service with technically and organisationally appropriate measures and train our personnel regularly in principles related to data processing.

We have compiled the most significant principles regarding data protection at Fanseat in this privacy notice, which we abide with in order to ensure privacy. This privacy notice applies to all processing of personal data related to our services.

We check regularly that our data protection principles are up-to-date and update them when needed.

#### Data protection

We take a high data protection level into account in all our operations: we process data in a confidential manner. We ensure this by using appropriate technology and data security solutions and ensuring the confidentiality of the data with administrative measures.

Why do we collect your personal data?

In order to agree on the delivery of services, we require sufficient information about you. We need your contact information in order to communicate with you and e.g. to inform you of changes in services.

In addition, our services require providing different kinds of data based on which we can identify you individually and improve the service to be suitable for you.

We also provide services that require providing your data in order to use them.

Due to the nature of our services, the processing of personal data is an essential and inseparable part of providing certain services.

## Personal data to be processed

We process appropriate and necessary personal data. Such data include identification data, contact information, information related to your customer relationship and the use of services.

Examples of personal data processed in our various services:

- Contact information, such as first name and last name, e-mail address, social media contact information
- Identification and personalisation information, such as language of communication or other preference information
- Direct marketing prohibitions and consents
- Payment transaction information

- Other further information provided by you
- Subscription, delivery and contract information for products, services and subscriptions and start and end date for customer relationship for services
- Customer information and classifications
- Possible contact persons and user information of corporate and community customers and information about their tasks in the company
- Customer history, for example communication, service changes or social media communication
- Information regarding invoicing and collection
- Data generated from the use of the services, such as the technical data Information about cookies and third-party cookies as well as other web analytics data

## Data generated from using the services

When you use our services on a browser or app, different kinds of data regarding your visits and use are saved. Such data include e.g. the IP address you use, browsing data or cookie data. In addition, we collect your information via the online services and mobile applications you use or devices using these services.

When you use our services, the use related to their content is recorded.

#### Cookies

Modern websites and services are based on a technology known as cookies that we use on our website. Cookies are small, user-specific text files that are saved on your browser. The server may later read the cookie installed on your browser and in this manner your browser may be identified as having visited our site previously. In this manner, you will get the best possible user experience on our website.

With the help of cookies, we may also collect data e.g. regarding the devices, browser and objects of interest of the users visiting our websites. The collected information can be used also for analytics, improving user experience and targeting marketing both in our own and our partners' advertisements. We aim to provide you with targeted content so that your user experience would be as smooth as possible.

We use both our own and third-party cookies. The third-party cookies we use include e.g. Facebook and Google Analytics cookies.

We monitor the functionality of the e-mails we send and we wish to ensure that you only receive communication from us that interests you. This means that we can follow which e-mails we have sent you and connect this data to your customer data.

You may disable the use of cookies in your browser settings, in which case you may lose a part of your user experience. If you disable the use of cookies, our website may become slower and the use of some features may be prevented. In this event also our possibilities to develop our services in accordance with your user preferences is hampered, and we cannot provide you with adverts targeted for you on the website.

Collecting data on potential customers, for example in competitions and events

When you participate in competitions and sign up to e.g. our events we may ask for your contact information or other personal data. We will use this data in order to organise the competition or event in question and possibly in order to contact you to tell you more about our products and services. We can also combine this data in our customer data systems. Competitions

or events may also be organised by our partners, in which case we will receive your contact information directly from them.

## How and for what purposes are we using your data

#### Grounds for data protection

When you acquire a service from us, we make a contract with you. In order to implement the service agreed upon, we process necessary personal data, for example your invoicing data.

We process your data when we have need for it in order to implement our appropriate interests (legitimate interest). The processing may be done to ensure the functionality of the services and for their improvement and to develop business operations. In such processing, we process your data typically as a part of a larger mass and we do not aim to examine your data specifically. By evaluating the data of a large group of people we can e.g. develop our services based on accurate and up-to-date information. In addition, with our legitimate interest, we offer you our services that you might be interested in.

We will process a part of your personal data based on the consent that you have provided. We ask for your consent e.g. for processing the cookie data used online in order to improve the functionality of our services. Such processing includes cookies used online that improve the functionality of our services. When we process your data based on your consent, you can cancel your consent at any time.

In addition, we process personal data for compliance with our legal obligations. Such obligations include retaining invoicing data separately for a legislated period of time.

#### **Profiling**

We wish to customise and develop our services, marketing and other interaction to suit you. For example, in our entertainment services we will recommend interesting content that might interest you based on your viewing history.

We can target the marketing of products that may interest you in our direct marketing. In order to form a marketing target group, we can process your age, purchase and payment history, place of residence, contact information and cookie information. When profiling, we therefore utilise both collective information and information directly related to you.

We use automatic credit check in our web shop when you purchase products or services with a credit purchase. In some cases, the purchase may be prevented due to credit history issues. In this case, please contact our customer service so that we can look for an alternative solution.

## Checking your own data

You can check the data concerning you at services own profile. The data generated from the use of services may also be gained via the user interfaces of the services.

#### Updating and specifying personal data

If you detect an error in your own data, you can fix this by notifying us via self-service and customer service channels.

## The retention period for personal data

We retain your personal data only for the necessary time period. The retention period for your personal data varies depending on the service and the nature of the data.

When the retention period for the data has terminated, we dispose of the personal data either by removing them or making them anonymous (i.e. anonymisation of the data in question). For example, we process your customer data for the entire duration of the customer relationship and due to certain legal obligations also for a required period afterwards or, based on our legit-imate interest, for direct marketing purposes. The data may be backed up and stored to ensure information security. The backups will be erased according to the backup retention cycle.

Please note that the public comments or other content you produce on online discussion forums may remain visible even after your customer relationship with us has ended.

We regularly evaluate the need for the retention period of the data and evaluate their purposefulness as technology and use needs develop.

### Marketing

We constantly develop and produce new services that correspond with our customers' needs in a changing and developing world. To be able to tell you about such services, we use your personal data for direct marketing purposes. We may be in contact with you by e-mails and other methods of communication.

We may also be in contact with you as a potential new customer when we have received your contact information e.g. when you participate in our competition or an event we organise or in another way.

If you do not wish to receive marketing communication from us, you can let us know via self service or customer service.

#### Disclosing personal data

When we provide services, we may disclose your personal data also to our subcontractors when they need to receive your data to e.g. provide a service.

On our website, we use different kinds of techniques enabled by our partners for analysis and marketing purposes. When providing these services, we disclose personal data to the service provider. In these cases we do not disclose personal data that identifies you, but technical data enabled by the service, for example with the help of cookies. These services are very common properties of modern websites. You can read more about our cookies in this privacy notice.

We produce some of our services in cooperation with our partners. To provide such such services, we disclose your personal data to the service provider. In some cases, using the service requires that you approve the privacy notice or terms of the service provider before using the service.

Third parties process your data for their own purposes in accordance with their privacy notice. Before disclosing the data, we ensure that the disclosure is in accordance with the law.

## Subcontractors and processing data outside EU

The production of our services is primarily within EU. Maintenance of the IT systems may be located outside of EU/EEA.

We use subcontractors when producing our services as well as related support services. When using subcontractors, we ensure that they abide with our privacy notice and process the data with care and confidentiality. We ensure this with contracts as well as by conducting inspections of the subcontractors' operations and by providing secure tools for their use.

Some of the personal data is processed outside of the EU area. This is necessary in order to produce the services, improve quality, provide expertise or enhance operations. Some of the processing work consists of maintaining the data located within EU and processing them with remote management, but in some cases we transfer the personal data to be processed by our subcontractors. In these cases we ensure that the processing party operates in accordance with our privacy notice, appropriately and with care, and that the justification of the processing is ensured e.g. with model contract clauses approved by the EU Commission.

We process your personal data when needed between Spring Media Digital Ventures AB and its subsidiaries.

Regardless of the data processor or the location of the data, the protection of your service and personal data works equally through the services we provide.

# Protecting copyright content

When providing material under copyright, such as book or video content for your use, we may protect the material with copy protection technology or water stamp in a manner that it can only be used by you or connected with you via your user or customer ID. In this manner, we aim to prevent possible abuse.

The scope of our privacy notice

This privacy notice concerns the processing of personal data in Fanseat service.

## Our contact information

https://www.fanseat.com/

support@fanseat.com

Spring Media Digital Ventures AB Linnegatan 44 11447, Stockholm Sweden

Your rights regarding the processing of your data

You have the right to influence the processing of your own data.

You have a right to check what data we process on you. You can access your own data in the service.

If you notice incorrect or outdated data in the personal data we process, we ask you to correct the data either via self-service or our customer service. With your up-to-date information, we can provide you the best possible service.

In service, you can cancel the consents that you have given, such as marketing consents. If the consent is related to using a particular service, you can cancel the consent in the manner described in the service in question.

You have the right to request us to remove the data that are no longer necessary for its purpose of use. We do our best to remove such data automatically, but if you, for one reason or another, notice outdated or unnecessary information in our processing, you can contact us.

You have the right to receive the data you have provided yourself if processing them is based on a contact between us or a consent you have provided. Services related to this are available as in-built properties but you can be in contact us.

In addition, you can ask us to restrict the data processing in certain situations or object to their processing. We have aimed to describe all our processing in an open and comprehensible manner in this privacy notice.

#### Cancellation of consent

When we process your data exclusively based on the consent you have given, you have the possibility to cancel it if you change your mind. This can be done easily in the service. Please note, however, that this does not affect the data processing that is done before the cancellation of consent.

## Right to appeal

Please contact us if you wish to make an appeal or present development suggestions about our processing of personal data. You can find the contact information on this page in the Contact Information section.

You can make an appeal concerning data protection or processing of personal data to a supervising authority, such as the Swedish Data Protection Authority.