

# Privacy Policy

# Privacy Policy

Joonze 2024:1

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*The following document describes in detail how and why Joonze gathers, stores, shares and uses your personal data – as well as outlines the controls and choices you may have around when and how you choose to share your personal data.*

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## 1. INTRODUCTION

This privacy policy (the ‘**Policy**’) describes how Joonze AB, a company incorporated and operating under the laws of The Netherlands with the Dutch company registration no. 859836265 (‘**Local Treasures Hospitality BV**’) processes personal data relating to you as a user of the services and any associated services provided by Joonze (the ‘**Service**’). The terms governing your use of the Service are defined in Joonze’s general terms and conditions (the ‘**Terms**’).

Joonze processes your personal data as a controller and is thus responsible that all processing is performed in accordance with applicable data privacy legislation.

Please be aware, that processing of your personal data is an absolute prerequisite for Joonze to perform its obligations under the agreement and it is your choice whether you want to use the Service.

## 1. HOW DOES JOONZE COLLECT YOUR PERSONAL DATA?

Joonze collects your personal data in the following ways:

1. **When you sign up for the Service** - when you sign up to the Service, Joonze collects certain personal data so you can use the Service.
1. **Through your use of the Service** - when you use the Service, Joonze collects personal data about your use of the Service.
1. **From third parties** - Joonze will receive personal data about you from third parties, e.g. partner companies that Joonze works with.

Joonze uses anonymized and aggregated information for purposes that include providing the Service, testing Joonze's IT systems, research, data analysis, providing and improving the Service, and developing new features and functionality within the Service.

## 1. WHAT PERSONAL DATA DOES JOONZE COLLECT?

In the tables below, Joonze sets out the categories and types of personal data Joonze collects and uses about you:

### *Personal data collected when you sign up for the Service*

Categories of personal data	What Joonze collects	Description of category
<b>Account Registration Data</b>	<ul style="list-style-type: none"><li>• name</li><li>• email address*</li></ul>	This is the personal data that is provided by you or collected by us to enable you to sign up for and use the Service.
	<ul style="list-style-type: none"><li>• user name</li><li>• address</li><li>• postal code</li><li>• country</li></ul>	The personal data Joonze will ask you to provide is required in order to create and administer your account, payment information and the likewise for the purpose of enter into the agreement.

*\*If you have an agent, representation or contact we may collect contact information such as email address to your agent and/or contact.*

## *Personal data collected through your use of the Service*

Categories of personal data	What Joonze collects	Description of category
<b>Service Usage Data</b>	<b>Interactions:</b> <ul style="list-style-type: none"><li>• name</li><li>• email address</li><li>• photos/images/videos</li><li>• text messages</li></ul>	This is the personal data that is collected about you when providing and using the Service - this may include:
	<b>Content:</b> <ul style="list-style-type: none"><li>• photo/images/videos</li><li>• text messages</li><li>• comments</li><li>• number of likes</li><li>• follower interaction</li></ul>	
	<b>Technical data:</b> <ul style="list-style-type: none"><li>• URL information</li><li>• cookie data</li><li>• IP address</li><li>• unique device ID</li><li>• language</li><li>• Joonze application version</li></ul>	
		<ul style="list-style-type: none"><li>• Information about your <b>interactions</b> with the Service which includes the date and time of requests you make, and your interactions with other users. This also may include details of your use of Third Party Applications.</li><li>• <b>Content</b> you post to the Service or allow the Service to access, including messages you send and/or receive via the Service and your interactions with Joonze, and/or personal data collected from Third Party Applications.</li><li>• <b>Technical Data</b>, further details about the cookies that are processed by us can be found in Joonze's Cookies Policy.</li></ul>

## *Personal data from third parties for performance of the Service*

Categories of personal data	What Joonze collects	Description of category
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Third Party Engagement Data		This is the personal data that Joonze collects from third parties such as Facebook, Instagram and other platforms you have elected to connect to in the Service for compiling your social media engagement profile.
	<ul style="list-style-type: none"> <li>• your third party social media ID</li> <li>• photos/images/videos</li> <li>• text messages</li> <li>• comments</li> <li>• aggregated statistics</li> </ul>	<p>This, for example, also includes aggregated statistical data that shows the number of ‘likes’ that followers have issued in response to posts made by you on such social media platform.</p> <p>The aggregated statistical data does not, however, contain any personal data related to any follower.</p> <p>The personal data Joonze collects is required in order to produce the validated social media engagement profile, which is the core service provided through the Service.</p>

### ***Personal data of social media engagement profile***

Categories of personal data	What Joonze collects	Description of category
Social Media Engagement Profile	<ul style="list-style-type: none"> <li>• name</li> <li>• photos/images/videos</li> <li>• text messages</li> <li>• comments</li> <li>• social media engagement graphs</li> </ul>	This is the personal data that Joonze compiles and stores under your account, visible for other users of the Service.

### ***Personal data for invoicing and payment of the Service***

Categories of personal data	What Joonze collects	Description of category
Payment Data	<ul style="list-style-type: none"> <li>• name</li> <li>• invoice address</li> <li>• credit card information (e.g. CVC, credit card number, expiration date)</li> </ul>	This is the personal data that Joonze collects for the purpose of managing any fees payable for your use of the Service.

## **1. WHAT DOES JOONZE USE YOUR PERSONAL DATA FOR?**

In the table below, you can find the reasons why Joonze processes your personal data, the associated legal bases relied upon to legally permit the processing of your personal data, and the categories of personal data (identified in Section 3 ‘What personal data does Joonze collect from you?’) used for these purposes:

Description of why Joonze processes your personal data	Legal Basis for the processing purpose	Categories of personal data used by Joonze for the processing purpose
To provide, personalize, and improve your experience with the Service, for example the social media engagement profile in order to compile your social media engagement profile and share it with other users of the Service.	<ul style="list-style-type: none"> <li>• Performance of a Contract</li> <li>• Legitimate Interest</li> </ul>	<ul style="list-style-type: none"> <li>• Account Registration Data</li> <li>• Service Usage Data</li> <li>• Social Media Engagement Profile</li> </ul>
To understand how you access and use the Service to ensure technical functionality of the Service, develop new products and services, and analyze your use of the Service.	<ul style="list-style-type: none"> <li>• Performance of a Contract</li> <li>• Legitimate Interest</li> </ul>	<ul style="list-style-type: none"> <li>• Account Registration Data</li> <li>• Service Usage Data</li> </ul>
To communicate with you for Service-related purposes, such as customer service and support.	<ul style="list-style-type: none"> <li>• Performance of a Contract</li> <li>• Legitimate Interest</li> </ul>	<ul style="list-style-type: none"> <li>• Account Registration Data</li> <li>• Service Usage Data</li> </ul>
To process your payment to prevent or detect fraud including fraudulent payments and fraudulent use of the Service.	<ul style="list-style-type: none"> <li>• Performance of a Contract</li> <li>• Compliance with legal obligations</li> <li>• Legitimate Interest</li> </ul>	<ul style="list-style-type: none"> <li>• Payment Data</li> </ul>
<p>To communicate with you or your agent and/or contact, for e.g.:</p> <ul style="list-style-type: none"> <li>• marketing,</li> <li>• research,</li> <li>• participation in surveys and sweepstakes.</li> </ul> <p>via emails, notifications, or other messages, consistent with any permissions you may have communicated to us (e.g., through the Notification Settings).</p>	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Legitimate Interest</li> </ul>	<ul style="list-style-type: none"> <li>• Account Registration Data and results from surveys and sweepstakes</li> </ul>

## 1. SHARING YOUR PERSONAL DATA

Your personal data is used by Joonze and by Joonze's processors or partner companies (e.g. companies using the Service). Joonze does not pass your personal data to other companies unless Joonze needs to do so on the basis of law, ordinance or public authority decision or in order to protect Joonze's rights or those of third parties.

Joonze never passes on, sells or exchanges your personal data for marketing purposes to third parties outside Joonze.

***Information Joonze may share with external actors***

Joonze shares your personal data with the following actors:

Categories of Recipients	Categories of personal data	Reason for sharing
<b>Operations Service Providers</b>	All personal data categories	Joonze uses technical and IT consulting service providers who may operate the technical infrastructure that Joonze needs to provide for the Service, in particular providers which host, store, manage, and maintain and further develop the Service, its content and the data Joonze processes.
		Joonze will share your personal data when it is necessary for us to do so in order to comply with a legal obligation under applicable law, or respond to valid legal process, such as a search warrant, a court order, or a subpoena.
<b>Law Enforcement and Data Protection Authorities</b>	All personal data categories	Joonze will also share your personal data when it is necessary for the purpose of Joonze's own, or a third party's legitimate interest relating to national security, law enforcement, litigation, criminal investigation, protecting the safety of any person, or to prevent death or imminent bodily harm, provided that Joonze deems that such interest is not overridden by your interests or fundamental rights and freedoms requiring the protection of your personal data.
<b>Banks and Credit Card Companies</b>	Payment Data	Joonze will share payment data with banks and/or credit card companies in order to issue and collect payment of Service fees.
<b>Purchasers of Joonze's business</b>	All personal data categories	Joonze will share your personal data in those cases where Joonze sells or negotiates to sell Joonze's business to a buyer or prospective buyer.

***Publicly available information***

The following personal data will be publicly available on the Service: your name and/or username, profile picture. For the avoidance of doubt, 'publicly available' in this context means, available only to those who have an activated and paid user account that grants access to the Service by log in. This means that such personal data will be shared with other users of the Service.

Categories of Recipients	Categories of personal data	Reason for sharing
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## **Your Service Followers**

- Account Registration Data
- Social Media Engagement Profile

This is the core of the Service, compiling your social media engagement profile and sharing it with the other users of the Service (**'Your Service Followers'**).

In sharing your social media engagement profile, Joonze will also share photos and/or social media posts and other relevant personal data that help a prospect collaborator to evaluate your social media engagement profile.

## **1. DATA RETENTION AND DELETION**

Joonze keeps your personal data only as long as necessary to provide you with the Service and for legitimate interests and essential business purposes, such as maintaining the performance of the Service, making data-driven business decisions about new features and offerings, complying with Joonze's legal obligations, and resolving disputes.

Please be advised, if you request deletion of your personal data, Joonze will no longer be able to perform its obligations under the agreement, hence the user account will be deleted, and the subscription terminated. Should you request deletion of your personal data, Joonze will comply with your request. However, Joonze cannot delete personal data which is legally required to maintain, including situations such as the following:

- If there is an unresolved issue relating to your account, such as an outstanding credit on your account or an unresolved claim or dispute Joonze will retain the necessary personal data until the issue is resolved;
- Where Joonze is required to retain the personal data for legal, tax, audit, and accounting obligations, Joonze will retain the necessary personal data for the period required by applicable law; and/or,
- Where necessary for legitimate business interests such as fraud prevention or to maintain the security of Joonze's users.

## **1. TRANSFER TO OTHER COUNTRIES**

Joonze processes your personal data in order to carry out the Service. This may include subcontract processing to, or share your personal data with, parties located in countries other than your home country. Joonze transfers personal data to countries outside the EU/EEA only if the country has an adequate level of protection according to the EU or the European Commission, or if this is specifically indicated when you provide your personal data to Joonze. Joonze ensures that the transfer of your personal data outside of the EU/EEA is carried out in accordance with applicable privacy laws and, in particular, that appropriate contractual, technical, and organizational measures are in place such as the Standard Contractual Clauses approved by the EU Commission or the EU-US Privacy Shield approved by the EU.

## **1. KEEPING YOUR PERSONAL DATA SAFE**

Joonze is committed to protecting users' personal data. Therefore, Joonze implements and maintains appropriate technical, security and organisational measures to protect your personal data against unauthorized or unlawful processing and use, accidental loss, destruction, damage, theft or disclosure. Access to personal data is provided only to those who need it for their employment duties.

Your password protects your user account, so Joonze encourages you to use a unique and strong password, limit access to your computer and browser, and log out after having used the Service.

## **1. YOUR RIGHTS AND YOUR PREFERENCES**

You have the right to request a copy of the personal data undergoing processing by Joonze.

If your personal data is incorrect, incomplete or irrelevant, you may request a rectification. You may also request to have your personal data erased if the personal data Joonze has obtained is no longer needed for any purpose and Joonze is not required by law to keep it. You may also have the right to limit the processing of your personal data, such as for marketing purposes.

You may, at any time, revoke your consent to let Joonze process your personal data. The withdrawal of your consent does not affect the lawfulness of the processing occurred before your withdrawal.

You are entitled to request the personal data relating to you and which you have submitted to Joonze to be transferred to another controller (the so-called right to data portability). The right is conditional upon the fact that the processing can be automated and that it is technically possible.

Furthermore, you have the right to file a complaint with the supervisory authority which in the Netherlands is the Dutch Data Protection Authority or your local Data Protection Authority.

## **1. CHANGE TO THIS PRIVACY POLICY**

Joonze may occasionally make changes to this Policy. When material changes are made to this Policy, Joonze will provide you with prominent notice as appropriate under the circumstances, e.g., by displaying a prominent notice within the Service or by sending you an email. Please, therefore, make sure you read any such notice carefully.

## **1. HOW TO CONTACT US**

Thank you for reading this Privacy Policy. If you have any questions about this Policy your rights, or how to exercise them, please contact us by using the 'Contact Us' form on the Joonze website or by writing to us at the following address:

Local Treasures Hospitality BV  
c/o Joonze  
Torenlaan 9  
1261GA Blaricum  
The Netherlands

[contact@joonze.com](mailto:contact@joonze.com)

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