

PRIVACY STATEMENT

Version May 2018

iMailo B.V. (iMailo) is committed to ensuring that your data is processed correctly. Therefore we (iMailo) handle the personal data that we receive with the utmost care, and in accordance with the requirements of the law. This is something you can rely on.

Who is responsible?

iMailo is the 'Processing Manager' in the sense of the GDPR for the processing of personal data in the following situations:

- Processing personal data of Users of our websites (other than a Publisher or Advertiser).
- The processing of personal data in the context of the relationship we have with Advertisers and Publishers, or relationships with other parties (excluding Users) with whom iMailo has contact or wishes to make contact;
- The processing of personal data of recipients - who have unambiguously given their consent - for promotions, newsletters and commercial e-mails from iMailo;
- The processing of all personal data related to persons who contact iMailo or of whom iMailo processes personal data.

A separate policy applies to partners, employees, temporary employees, temporary workers, student interns, and applicants from iMailo.

What kind of personal data does iMailo process?

iMailo processes personal data that you have provided to iMailo, personal data generated during your visit to the website and/or reading newsletters and/or personal data that you yourself have provided to iMailo for placing an order and/or personal data that iMailo may derive from other sources, such as corporate Social Media platforms. It concerns the following types of personal data:

- Personal data provided by you:
- Personal data obtained through or generated by our website, electronic newsletters, commercial e-mails or related technologies:
- Personal data obtained from other public sources such as social media platforms and public registers:
- (Functional) cookies in the context that you click as a User - Linked to our Services - Click to a website.
- Advertiser and Publishers provide iMailo with administrative information, including contact details, financial data and passwords.

Purposes

iMailo uses your personal data for various purposes:

- Executing the agreement.

Examples are as follows:

iMailo processes data from Advertisers and Publishers for services, including to provide information about Services to Advertisers and to be able to process payments. iMailo automatically encrypts the passwords and they are not visible by iMailo.

iMailo processes data from Users (not being an Advertiser or Publisher). Enabling a click-through to a website for our Publisher is an essential part of the service provided by iMailo. In order to be able to execute the Services, iMailo stores data.

- To comply with legal obligations.
- To maintain contact with you. Your contact details will be kept in our customer's system and may be used for sending newsletters, updates and sending information that you have requested from us.
- Improving our product and service information and executing targeted marketing campaigns.
- Conducting and analysing customer satisfaction surveys.
- Creating user statistics from the iMailo website.

Grounds for the processing of personal data

iMailo processes the personal data excluded on the basis of one of the legal grounds mentioned in article 6 paragraph 1 GDPR. The following grounds are specifically applicable:

- **Permission**
If you should grant permission to our request to process your personal data, you retain the right to withdraw this consent.
- **Execution of the agreement**
If it is necessary, in the context of the execution of our services as described above under the heading "objectives".
- **Legal obligation**
iMailo may be required by law to disclose personal information in the context of a legal process, or if enforcement authorities so require. In order to comply with the conditions of a valid legal process, iMailo may disclose this information without your knowledge or permission, and potentially without informing you. iMailo reserves the right to challenge access to personal data by authorities.
- **Justified interest**
If another company takes over iMailo or takes over the assets of iMailo in which or under which your personal information is understood or falls, that company will acquire the collected personal information and the rights and obligations of this Privacy Policy regarding your personal data then will be transferred to that company.

Processors

iMailo uses service providers (processors) to process personal data on behalf of iMailo. iMailo concludes a processor agreement with these processors, that meets the requirements of the GDPR.

For example, iMailo works with IT service providers that provide software (software as a service) or hosting services. There are also IT service providers that offer us assistance in maintaining security and stability of our systems. We also use external party services for sending newsletters and commercial e-mails.

Sharing personal information with external parties

Sometimes it is necessary to share your personal data with external parties. This may be necessary for the execution of the agreement, depending on the circumstances of the case. There are also legal obligations that require personal data to be passed on to external parties.

In amongst others the following cases, personal data are provided to external parties.

If a court ruling requires us to disclose personal information to external parties, we will have to comply.

Personal data can also be provided to external parties, in the event of a reorganization or merger of our company or the sale of (a part of) our company.

Transfer outside the (European Economic Area) EEA

In some cases it is necessary to transmit such data to parties established outside the European Economic Area (EEA). Depending on the circumstances of the case, this may be necessary for the execution of your purchase agreement.

Retention periods

iMailo keeps personal data that it processes, no longer than necessary, for the purpose of processing or as required by law.

Security

iMailo provides appropriate security for the personal data that it holds, in accordance with the applicable requirements and guidelines.

Questions or complaints?

Every person can exercise certain rights with respect to his or her personal data on the basis of the GDPR. In certain cases, you have the right to inspect, rectify and delete personal data. You may also object, in certain cases, to the use of your data or request that this use is restricted. In certain cases, you can even request your data and take it to another party. For all these questions, please contact us via telephone number +31 (0) 88 3232 010 or e-mail affiliate@iMailo.com

Use of cookies

We use cookies on our websites. On the first visit to the website, a message on the screen will prompt your explicit permission for the use of cookies. A cookie is a small file that is sent along with pages from this website and stored by your browser on the hard drive of your computer or mobile device. We use cookies to remember your settings and preferences, such as the language of the website.

You always have the option to remove cookies from your hard drive. Additionally, you can disable cookies through your browser. For example, see this [explanation by the Consumers' Association](#) for an explanation.

(Functional) Cookies

iMailo uses (functional) cookies. However, iMailo does not use personally traceable data and does not store personal data. iMailo always stores encrypted and anonymised data. The cookies and data of iMailo are solely used to anonymously measure which website (from a Publisher associated with iMailo) has referred a User to an Advertiser Website.

The encrypted and anonymised cookies of iMailo contain the following data:

- o Information from the Publisher that is forwarded by the User.
- o Data of the link with which and how the User went to the website of the Advertiser.
- o Information from the Advertiser, including the website, to which the User was sent via a link.
- o The date and time.
- o Possibly the data of the Publisher's link.

These encrypted cookies from iMailo do not contain data that can be traced back to persons.

iMailo stores the following other statistical data. This is not personal data.

- o Country of the User.
- o Browser version.
- o An IP Hash (Secure Hash Algorithm).

Google Analytics

We use Google Analytics to track how users use the website and how effective our AdWords ads are with Google search results pages. The information obtained, including your computer's IP address, is transferred to Google. Google stores this on servers in the United States. Read [Google's privacy policy](#) for more information, as well as the specific [privacy policy of Google Analytics](#).

Google uses this information to keep track of how our websites are used, to provide reports about the websites to us and to provide her advertisers with information about the effectiveness of their campaigns. Google may supply this information to third parties if Google should be legally obliged to do so, or for as far as these third parties are processing the information on behalf of Google. We have no influence on this. We have not allowed Google to use the obtained Analytics information for other Google services.

Social Media Cookies

If we use so-called tracking cookies, we request permission on our website.

Changes to the Privacy Statement

iMailo reserves the right to amend or change this privacy statement at any time and for any reason.

This is an English translation of the original Dutch iMailo Privacy Policy. The Dutch version will prevail whenever there is a divergent interpretation between the translation and the original