

Privacy Policy for TELENOR SmartAd

This Privacy Policy ("Policy") addresses the way in which Evolway Media Ltd., as a personal data controller, collects, uses and discloses personal information of "Telenor SmartAd" users ("the Application") as well as of services offered through the application ("Services"). Evolway Media Ltd. Has its headquarters and registered office in the city of Sofia, 90 "Bulgaria" Blvd., fl. 5, and is registered in the Commercial Register under UIC 205312073 ("Evolway", "Ours", "Us" and "We").

The information submitted through the application is collected by Evolway as a supplier of the application, which was developed by Evolway in connection with a concluded contract with Telenor Bulgaria EAD with UIC 130460283, with headquarters and registered office in Sofia, Mladost 4, Business Park Sofia, Building 6 ("Telenor").

By providing your information, you confirm and accept the above-mentioned collection by Evolway. The Evolway Privacy Policy for the Telenor SmartAd Application governs the use and disclosure of information collected through the Application. Evolway's privacy policy is available on: www.Telenor.bg/Telenor-smart-ad

This Policy is subject to periodic review, about which you will be notified in advance by the Application. Please periodically check the webpage above. Continuing to use the Application or the Services after receiving a notification about such changes is considered as a confirmation by you of the respective changes and your consent to be bound by the terms under such changes.

Evolway Contact Information regarding Personal Data Protection

You can contact us at our headquarters:

Sofia, 90 "Bulgaria" Blvd., fl. 5

For any matters concerning the processing of your personal data, you may also contact the Evolway's Data Protection Officer at the following contact details: e-mail : dpo@evolway.com.

The information that we collect

The information that we are receiving from Telenor:

- Unique registration code representing the user identifier generated by the Telenor's authentication solution (find out more in the Privacy policy of the authentication solution of Telenor, available at www.telenor.bg/privacy)

Information provided by you during the registration process:

- Your age;
- Your gender;
- Your marital status;
- Your place of residence;
- Your interests

Information that you allow us to collect or which you provide us with

- We also collect information, which is provided to us when you communicate with us about the Services or the Application.

Automatically collected information

- The Application can automatically collect certain information, such as: the type of mobile device used, mobile device identifiers, your mobile device IP address, the operating system of the mobile device, the Wi-Fi Mac address, as well as information on how you use the Application. Additionally, in case of application failure, we can obtain information about the software version of the respective mobile device model, which allows us to identify and correct errors as well as to improve the Application performance.
- Log Files: We automatically collect certain information and store it in log files ("Log Files"), including IP addresses, browser type, web pages for forwarding/exiting, operating system, date/time recording, and click data. We use the information to improve the content of the Application and the Services, for the purpose of performing analyses, providing information to users, as well as to better tailor the Application and the Services to the needs of our users, including providing advertising, tailored to users' needs.
- Analysis. We may use third-party analytical services to better understand how users use the SmartAd Application and the Services. Some information can be collected in the process, such as how often users open the Application and what features of the Application they use. We use this information to improve our Application and Services.

Purposes for which we use the collected information

- In order to answer comments, requests and questions, as well as in relation to customer service;
- To provide and communicate with you about the services offered through the SmartAd Application ("Services");
- To better understand your needs and to adapt the features and the content of the Services accordingly;
- To show you ads;
- To settle our relationship with advertisers whose ads we show in Telenor SmartAd;
- In order for you to be able to receive certain incentives from Telenor in accordance with the Terms of Service of "Telenor SmartAd"
- For processing and delivery of the requested services and functionalities;
- To identify you as a user in our systems;
- To facilitate the creation, security and administration of your SmartAd account;
- To resolve disputes and/or solve problems;
- To develop and improve the marketing and advertising regarding the SmartAd Application and Services;
- For marketing purposes in connection with our products and services that we believe may be of interest to you.

Legal basis for using the information

- You have agreed to the administration of your personal data for the purposes of the e-marketing and advertisement (as part of the services provided through the TELENOR SmartAd Application) and your consent has been obtained upon your registration for the TELENOR SmartAd Application, and you may withdraw your consent at any time, but this will make impossible for you to receive incentives from Telenor SmartAd in accordance with the Terms of Service of the Telenor SmartAd Application, as we will not be able to show you ads without it. In addition, you may at any time withdraw the permissions that you granted at the time of installation of the application, but in such a case you will not be able to use its functionalities;

- Your personal data administration is also performed in connection with Evolway's legitimate interests to provide and facilitate the provision of the Telenor SmartAd services and functionalities for which you have registered and agreed to receive through the TELENOR SmartAd Application; or
- Your personal data administration is necessary for the purpose of performing a contract to which you are a party.

The recipients or the categories of recipients of your personal data are:

- Telenor, to which company we will provide information for the purpose of settling our contractual relationship, as well as for the purpose of providing certain incentives by Telenor in connection with your use of Telenor SmartAd, in accordance with the Terms of Use of the "Telenor SmartAd" Service;
- Our partner advertisers whose ads are shown in Telenor SmartAd. We may share some limited categories of your personal information that are summarized and do not allow identification, such as gender, age, city and interests, with third parties that provide services or products you may be interested in.
- Service Providers – personal data processors on our behalf and at our expense. We may share your personal information with our providers of services – personal data processors who assist us in providing the TELENOR SmartAd application and services.
- Third parties involved in corporate restructuring. We may share your personal information with third parties in connection with the corporate restructuring of our company, including the sale or transfer of all or part of the business. This may include, for example, a merger, financing, acquisition or insolvency proceedings.
- Where necessary or required by law. We may share personal data when we consider it necessary or appropriate to ensure (a) compliance with applicable law; (b) compliance with a legal process, including responding to a request from competent regulatory authorities and other governmental authorities; (c) the implementation of the Privacy Policy; and (d) the protection of our rights, privacy, safety or property, as well as yours and those of others.

The information that we collect from you, including personal information, may be transferred, stored and administered in a non-EEA country, including, but not limited to, the United States, only if it provides an adequate level of protection of your personal data. When transferring your data to the United States, the recipient of your data self-certifies according to Privacy Shield. Standard data protection clauses apply when transferring your data to another country.

Profiling

We are performing segmentation based on shared interests and consumer's behaviour, with the aim to serve ads that are more likely to result in visiting the advertiser website or in a purchase

Your rights regarding the processing of your personal data

Right to information You have the right to ask us for information on whether and to what extent we process personal data.

Right to correction: In the event that we process incomplete or incorrect/erroneous data, you may, at any time, request that we correct or complete them.

You can view, update, make corrections or delete your personal data after signing in into your account or by contacting us at dpo@evolway.com. In the event that you completely delete all of your personal information, your account may be disabled, although the personal information associated with the account remains in the application unless you delete all your personal information from the application.

Right to deletion: You may request the deletion of the personal data related to you, if we process this data without a legal basis. Please note that there may be reasons for which the deletion can not take place immediately due to a legal requirement for data retention.

Right to restrict the processing: You can request a restriction of the personalized data being processed if:

(a) you contest the correctness of the data, for the period in which we need to verify its correctness; or

b) the processing of the data is without a legal basis, but instead of deleting them, you want their limited processing; or

c) we no longer need this data (for the intended purpose), but you need them for the establishment, exercise or protection of legal claims; or

d) you have objected to the processing of the data, pending verification of the controller's legitimate grounds.

Right to data portability: You may ask us to provide the personal data that you have entrusted to our care in an organised, ordered, structured, commonly accepted electronic format if:

a) we process the data in accordance with the contract and based on the declaration of consent, which may be withdrawn or on a contractual obligation; and

b) processing is carried out automatically

Right to object: In the event that we process data for purposes/tasks or a task of public interest or to exercise official authority conferred on us, or we have indicated that the processing of the data is for our legitimate interest, you may object to the processing of the data.

Right to a complaint: In case you think that we are violating the Bulgarian or European legislation, please contact us to clarify the issue. Of course, you have the right to lodge a complaint with regulatory authorities within the EU and the Republic of Bulgaria in the institutions responsible for the protection of personal data.

Competent authorities for personal data protection:

For a complaint you have the right to refer the matter to the Commission for Personal Data Protection, (Sofia, 1592, Prof. 2 Tsvetan Lazarov, phone: +3592/91-53-518, E-mail: kzld@cpdp.bg) within 6 months of becoming aware of the violation, but not later than two years after it was committed. In case of refusal to be given access to your personal data or to their correction, you have the right to contact the Commission for assistance in exercising your rights.

Applications for the exercise of rights shall be submitted personally or by a person expressly authorised by you. In the event that the application is submitted by post or in writing, it can be done without verification of an identity document by a representative of Evolway. An application may also be filed electronically, in accordance with the procedure for drawing up and submitting an electronic document provided for in the legislation in force. The application should contain: a) description of the request; b) preferred form of communication and actions under Art. 15-22 of Regulation (EU) 2016/679; c) signature, date of submission of the application and correspondence address; d) upon application by an authorised person, the relevant power of attorney should be attached to the application.

Your personal data account/profile shall be stored for no more than 5 years after the last use of the Application and Services. Longer storage is possible if required by law or for the purpose of establishing, exercising or protecting legal claims by Evolway, including for the purpose of proof in administrative or judicial proceedings.

We administer the data on the basis of your consent. You may withdraw your consent at any time by submitting a written notice to us.

Our application may contain links to third party websites. By clicking on a link leading to another website, you leave the application and go to the other website, and the information about you may be collected by another person. We do not exercise control over, do not review or are responsible for such external websites, their content, or their use of the information collected by them about you. The terms of this Policy do not apply to such websites or to their use of the information collected about you.

We may periodically change this Policy for some reason. Should any changes be made, we will change the date of the last update and publish the new Policy here. Periodically review the Policy for possible changes.

This document was last updated on: 13.05.2020