Privacy declaration Tracebuzz

Tracebuzz is located at Randstad 21 30, 1314 BM Almere

Tracebuzz is an online webcare tool aimed at providing customer contact. Tracebuzz contains an online search engine that searches public data from sources such as social media, blogs, news sites and forums. Tracebuzz can use this tool on behalf of its customers and search public sources for information specifically aimed at these customers. This is done by searching the public sources based on the customer's company name.

Our customers use this public data for their own services. Tracebuzz only collects this data on behalf of the customer and does not use it itself. Tracebuzz therefore has the role of processor and Tracebuzz's customers are the controller. The customer chooses which information she wants to receive from Tracebuzz, but also how she wants to use this data. In this privacy statement you can read how Tracebuzz handles the processing of personal data. Tracebuzz has also made agreements with its customers about the handling of personal data.

This privacy statement was last updated on October 10, 2019.

Collection of personal data by Tracebuzz

As a processor, Tracebuzz collects public data from people who are active on the internet on behalf of its customers. This data may contain personal data. The sources from which Tracebuzz obtains this data are social media, blogs and other platforms where users actively share information on the internet.

With this data, customers can, for example, find out what is publicly written about their brand and / or resolve potential complaints. Personal data is also collected via the software that Tracebuzz offers to its customers to enable communication with the users. Information about the person who posted the message is collected via the software information. This is only data that the user has made public or has sent in a private message to the customer.

This could include a (profile) name, gender, number of followers, profile description, profile photo, place of residence, number of conversations between the customer and user, and other information that the user (publicly) shares by means of messages on social media or blogs. In addition, attachments added to a private message addressed to the customer can also be collected. Think of added images in a message. This can be special personal data.

This does not mean that all of the aforementioned information is collected about you by default. The information that is collected depends on the information that is currently public and available.

To ensure that outdated data is not processed, the data collected at the time of collection is no more than three days old. Data older than three days is not relevant for Tracebuzz customers. The data is collected once, it includes a snapshot and reference is made to the original location and associated dates and times. The data is only displayed with the specific message of the moment. Tracebuzz has no way to validate all previously found messages whether those messages are still available online. At the request of the customer or the data subject (see also the heading "Rights of data subjects") Tracebuzz will remove incorrect or undesirable data. This data is then stored on behalf of its customers for 1.5 years in the Tracebuzz system, so that the customer can use this data to improve its services. The data is then anonymized or removed from the system, unless the customer needs this personal data for longer.

Purposes of processing personal data

The collected data is collected by Tracebuzz for its customers so that they can effectively and correctly deliver their products and services to their own customers. The data is collected for the following purposes:

- performing data analyzes of messages from public sources;
- improving the service and solving possible complaints by our customers;
- to provide our customers with a product to exercise customer contact.

Retention periods

On behalf of its customers, Tracebuzz does not store personal data for longer than 1.5 years, unless it is necessary for the customer to store the data longer. At the end of this period, the personal data will be anonymized or deleted, unless otherwise agreed with the customer.

Provision of personal data

Tracebuzz can use other service providers to process personal data. These service providers will act as (sub)processors and only process the personal data on behalf of Tracebuzz. Tracebuzz concludes a processor agreement with these (sub)processors, in which the responsibilities that Tracebuzz has for the (sub)processor are imposed.

Security

Tracebuzz has taken appropriate technical and organizational measures to protect the personal data against loss and to prevent unlawful processing. This also happens to prevent access to the personal data by unauthorized persons. Tracebuzz does this partly by:

- Contracting parties that are certified for personal data security.
- Drawing up, maintaining, checking and complying with procedures.
- Digital as Physical access protection.
- Data encryption.
- Separating digital and physical environments and data.
- Internal and external audits.

These security measures are regularly tested for vulnerabilities by a professional third party and supplemented or tightened if necessary.

Data subjects' rights

Tracebuzz has the role of processor in this data processing. However, Tracebuzz offers the possibility to submit a request to her to have your rights executed. Tracebuzz then consults this request with its customers to identify which customers process your data. Do you want to have access to your data and / or move, change or move your data? Then Tracebuzz can delete, change or move your data from the system in consultation with its customers. You can submit a request for this by sending an e-mail or by contacting us by telephone. Tracebuzz's contact details are included at the bottom of the page.

Use external integrations

Tracebuzz offers the possibility to integrate with other platforms through an API. When using these platforms via Tracebuzz, you must observe the privacy policies of these various parties.

Platforms that we support include

• Facebook: <u>Terms of Service</u> & <u>Privacy Policy</u>

• Instagram: Terms of Service & Privacy Policy

• Twitter: <u>Terms of Service</u> & <u>Privacy Policy</u>

• Youtube: Terms of Service & Privacy Policy

• LinkedIn: Terms of Service & Privacy Policy

Changing the privacy statement

Tracebuzz reserves the right to amend this privacy statement. Changes will be published on our website. It is therefore recommended to consult this statement regularly so that you are aware of any changes.

Personal Data Authority

Of course we are also happy to help you if you have complaints about the processing of your personal data. Pursuant to privacy legislation, you have the right to file a complaint with the Dutch Data Protection Authority against our processing of your personal data. You can contact the Dutch Data Protection Authority for this.

Contact details

If you have any questions and / or comments after reading this privacy statement, you can contact us via the contact page.

We also recommend reading our terms and conditions.