

PRIVACY & DATA POLICY

HAPPY CREW HC LTD

This Privacy & Data Policy (together with Terms of Service and any other documents referred to in it) describes and governs how we collect, store and use your information collected by us, Happy Crew HC Ltd, via our websites at www.thehappycrew.net or via our mobile app named Happy Crew. In the Happy Crew “Settings” you may find additional tools and information.

Please read this document carefully. By accessing or browsing our website and mobile app, you confirm that you have read, understood and agreed to this Privacy & Data Policy in its entirety. If you do not agree to this Privacy & Data Policy in its entirety, you shall not use the Happy Crew website nor the mobile app.

We respect your right to privacy and will only process information about you that we receive through the use of our Products in accordance with the EU General Data Protection Regulation (GDPR) 2016/679, the Adequacy decisions of EU, the Privacy and Electronic Communications (EC Directive) Regulations 2003 as revised by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011, and other applicable privacy laws.

The data controller responsible for information for the purpose of the EU General Data Protection Regulation (GDPR) is Happy Crew HC Ltd.

1. Our contacts.

If you have any question about how we collect, store and use your information, or if you have any other privacy-related question, please contact us at any time at following address:

Happy Crew HC Ltd
77 Strovolos Avenue, 2018, Strovolos, Nicosia, Cyprus
+357 96504359
info@thehappycrew.net

2. Collection of information.

With Happy Crew website and mobile app we want you to enjoy a social experience where you are free to express your personality and to meet other people and businesses with similar attitude and interests. Our goal is to make your experience more correspondent to your needs. Then in order to provide our Products, we need to process your information. We collect information based on your use of Happy Crew website and mobile app. Accessing and browsing the Happy Crew website and/or the Happy Crew mobile app you allow us and give your consent collect, store, process and transfer the data and information coming from the following sources.

Information you provide directly or indirectly.

- Personal information. We collect the information about yourself by filling in forms on the Happy Crew Website and/or App or by corresponding with us by phone, email or otherwise. This includes information you provide when you register to use the Happy Crew Website and Mobile App, subscribe to our newsletters or services, search for products, contact a business on the Happy Crew Website (a copy of which is sent to Happy Crew).
- Information and content you provide. For the purposes described in this privacy policy, we collect and process the content, communications and the information you provide when you use our Products, including when you sign up for an account, create or share content, and message or communicate with others. We also refer to the information in or about the named content (i.e. metadata), such as the date a file was created or the location of a photo. There are some kind of information subject to EU special protection that you can chose to provide during your experience with Happy Crew, such as religious and

political views, sexual orientation, interests, health status, racial and ethnical origins, philosophical beliefs and trade union membership.

- Networks and connections. We collect about you connections to other users on Happy Crew and how you interact with them across our Products.
- Your usage. We collect information about how you use our Products, for example the types of content you view or interact with; the features you use; the actions you take; the people or accounts you interact with; the time, frequency and duration of your activities.
- Device information and technology. We collect information from and about the devices used to connect with our Products, such as but not limited to: attributes (operating system, hardware and software versions, battery level, signal strength, available storage space, browser type, app and file names and types, and plugins); operations (information about operations and behaviours performed on the device); GPS location; Network and signals (Wi-Fi access points, beacons, cell towers, mobile operators, mobile phone number, IP address, time zone, language);
- Cookie data: data from cookies stored on your device, including cookie IDs and settings.

Information from partners.

Third-party partners, such as advertisers and publishers, can send us information through business tools they use, including our plug-ins. These partners provide information about your activities off Happy Crew - including information about your device, websites you visit, purchases you make, the ads you see, and how you use their services - whether or not you have a Happy Crew account or are logged into Happy Crew. We also receive information about your online and offline actions and purchases from third-party data providers who have the rights to provide us with your information.

We require each of these partners to have lawful rights to collect, use and share your data before providing any data to us.

3. Use of collected information.

We use the information we have as described in this document to provide and support our Products and related services as follows:

Provide, personalise and improve our Products.

We use the information we have to deliver our Products, to personalise features and content (including News Feed and ads) and make suggestions for you (such as events you may be interested in) on and off our Products. For this purpose we use - as detailed below - your connections, preferences, interests and activities based on the data we collect and learn from you and others (including any data with special protections you choose to provide where you have given your explicit consent); information on use and interaction with our Products; and the people, places, or things you are connected to and interested in on and off our Products

- We connect information about your activities on different Products and devices to provide a more tailored and consistent experience on all our Products you use, wherever you use them.
- We use the information we have about you-including information about your interests, actions and connections-to select and personalise ads, offers and other sponsored content that we show you.
- We use location-related information to provide, personalise and improve our Products, including ads, for you and others. Location-related information can be based on things like precise device location (if you've allowed us to collect it), IP addresses, and information from your and others' use of our Products (such as check-ins or events you attend).

- We use the information we have to develop, test and improve our Products, including by conducting surveys and research, and testing and troubleshooting new products and features.

Provide measurement, analytics, and other business services.

We use the collected information to help advertisers and other partners measure the effectiveness and distribution of their ads and services, and understand the types of people who use their services and how people interact with their websites, apps, and services.

Promote integrity, security and safety.

We use the collected information to verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of our Products, and promote safety and security on our Products.

Communicate with you.

We use the information we have to send you marketing communications, communicate with you about our Products, and let you know about our policies and terms. We also use your information to respond to you when you contact us.

4. Share of information.

When you use our Products, you share information with other users.

Some information may be public for other users or not and they can be seen by anyone, on or off our Products, including if they do not have an account. You should consider what you share and who you choose to share with, because people who can see your activity on our Products might choose to share it with others also off our Products. For the same reason you should consider when you comment on someone else's post or react to their content.

When you choose to use third-party apps, websites, or other services that use, or are integrated with, our Products, they can receive information about what you post or share. Also, when you download or use such third-party services, they can access the data and any information that you share with them. Information collected by these third-party services is subject to their own terms and policies, not this one.

If the ownership or control of all or part of our Products or their assets changes, we may transfer your information to the new owner.

We work with third party partners who help us provide and improve our Products or to grow their businesses. For this purpose, we may transfer your information to them with no further communication. In any case we request strict conduct on how our partners can use and disclose the data we provide. We share information with partners who use our analytics services; advertisers; measurement partners; partners offering goods and services in our Products; vendors and service providers.

In certain situations (explained in this document) we are requested to share information with law enforcement or in response to legal requests.

5. Legal basis for processing data.

Under European law, companies must have a legal basis to process data. You have particular rights available to you depending on which legal basis we use. In any case, you always have the right to request access to, rectification of, and erasure of your data under the General Data Protection Regulation (the 'GDPR'). To exercise your rights, visit the Happy Crew Settings or contact us.

For all people who have legal capacity to enter into an enforceable contract, we process data as necessary to perform our contracts with you. We describe the contractual services for which this data processing is necessary in the Terms. The core data uses necessary to provide our contractual services are:

- To provide consistent and seamless experiences across the Happy Crew Products;
- To provide, improve and personalise our Products;
- To promote integrity, security and safety;
- To transfer, transmit, store, or process your data inside and outside the EEA;
- To communicate with you.

The other legal bases we rely on in certain instances when processing your data are:

a) Your consent:

- For processing data with special protections (such as religious views, political views, sexual orientation or health status, if you share this information in Happy Crew).
- For using data the advertisers and other partners provide us about your activity off of Our Products, so we can personalise the ads we show you.
- For sharing personal data that identifies you (such as your name or email address) with advertisers.
- For collecting information you allow us to receive through the device-based settings you enable (such as access to your GPS location, camera or photos), so we can provide the features and services described when you enable the settings.
- When we process data you provide to us based on your consent, you have the right to withdraw your consent at any time and to port that data you provide to us, under the GDPR.

b) Our legitimate interests or the legitimate interests of a third party, where not outweighed by your interests or fundamental rights and freedoms:

For people under the age of majority (under 18, in most EU countries) who have a limited ability to enter into an enforceable contract only, we may be unable to process personal data on the grounds of contractual necessity. Nevertheless, when such a person uses our Services, it is in our legitimate interests to:

- Promote integrity, security and safety.
- Provide, personalise, and improve the Happy Crew Products.

c) For all people, including users under the age of majority:

- For providing measurement, analytics, and other business services where we are processing data as a controller. The legitimate interests we rely on for this processing are:

- To provide accurate and reliable reporting to our advertisers, developers and other partners, to ensure accurate pricing and statistics on performance, and to demonstrate the value our partners realise using Happy Crew Products;
- In the interests of advertisers, developers and other partners to help them understand their customers and improve their businesses, validate our pricing models, and evaluate the effectiveness of their online content and advertising on and off the Happy Crew Products.

- For providing marketing communications to you. The legitimate interests we rely on for this processing are:

- To promote Facebook Company Products, and issue our direct marketing.

- To share information with others including law enforcement and to respond to legal requests. The legitimate interests we rely on for this processing are:

- To prevent and address fraud, unauthorised use of the Our Products, violations of our terms and policies, or other harmful or illegal activity; to protect ourselves (including our rights, property or Products), our users or others, including as part of investigations or regulatory inquiries; or to prevent death or imminent bodily harm.

We collect, use and share the data that we have in the ways described in this documents:

- as necessary to fulfil our Terms of Service;
- consistent with your consent, which you may revoke at any time;
- as necessary to comply with our legal obligations;
- to protect your vital interests, or those of others;
- as necessary in the public interest;
- as necessary for our (or others') legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data.

6. Exercise of rights provided under the GDPR.

Under the General Data Protection Regulation, you have the right to access, rectify, port and erase your data. Learn more about these rights, and find out how you can exercise your rights in the Settings or contacting us. You also have the right to object to and restrict certain processing of your data. This includes:

- the right to object to our processing of your data for direct marketing;
- the right to object to our processing of your data where we are performing a task in the public interest or pursuing our legitimate interests or those of a third party.

7. Data retention and account deletion.

We store data until it is no longer necessary to provide our services or until your account is deleted. When you delete your account, we delete things you have posted and you will not be able to recover that information later. Information that others have shared about you is not part of your account and will not be deleted.

8. Response to legal requests or harm prevention.

We access, preserve and share your information with regulators, law enforcement or others:

- in response to a legal request, if we have a good-faith belief that the law requires us to do so or that the response is required by law in that jurisdiction or is consistent with internationally recognised standards.
- when we have a good-faith belief it is necessary to: detect, prevent and address fraud, unauthorised use of the Products, violations of our terms or policies, or other harmful or illegal activity.

Information we receive about you can be accessed and preserved for an extended period when it is the subject of a legal request or obligation, governmental investigation, or investigations of possible violations of our terms or policies, or otherwise to prevent harm.

9. Data operation and transfer.

We share information with our partners and with those you connect and share with in accordance with this policy. Information controlled by Happy Crew HC LTD will be transferred or transmitted to, or stored and processed in, Cyprus or other countries outside of where you live for the purposes as described in this policy. These data transfers are necessary to provide the services set forth in our Terms and to provide our Products to you.

10. Notification of policy change.

We will notify you when we make changes to this policy and give you the opportunity to review the revised policy and choose to continue using our Products.