



Privacy Policy Link-Busters

Link-Busters Operations B.V.

Last updated: May 2018

Privacy policy

Who are we and what do we do?

We are **Link-Busters Operations B.V.**, trading under the name **Link-Busters**. You can find our contact details at the bottom of this "**Privacy Policy**". We offer online services ("**Services**") in the field of anti-Piracy. Our Services entail that we detect and remove links from websites offering copyright protected material without authorization. You can find more information about our Services on our website: <http://www.link-busters.com>

("(**Our**) **Website**"). This Privacy Policy applies to all use of our Services and Website.

Privacy and the Relevant Legislation

Privacy is of great importance to us. We comply with the General Data Protection Regulation ("**GDPR**"),¹ which is effective as from 25 May 2018. The GDPR will hereafter also be referred to as "**the Relevant Legislation**".

What is this?

This is a "**Privacy Policy**". In this document, we explain what kind of Personal Data we collect in relation to our Website and Services. We also explain how we store, protect and use your Personal Data and for which purposes.

Personal Data

In this Privacy Policy, "**Personal Data**" refers to information or pieces of information that could allow you to be directly or indirectly identified. This definition is in accordance with the Relevant Legislation.

We act as Data Processor and as Data Controller

Acting as Data Processor:

Most of the Personal Data we collect and process, are processed on behalf of the clients who use our Services ("**Clients**"). Our Clients determine the purpose and means of this processing of personal data, which means they act as Data Controller within the meaning of the Relevant Legislation. We process this data strictly in accordance with the instructions of our Clients and we don't process this data for our own purposes. In this respect, we act as "**Data Processor**" within the meaning of the Relevant Legislation. Our obligations as Data Processor are laid down in the Data Processing Agreement we enter into with our Clients.

As Data Processor, we collect and process the following (Personal) Data on behalf of our clients:

Domain names and email addresses of providers, public profile names of Internet users posting infringing links on certain domains.

For more information on the Personal Data we process as Data Processor and the relevant purposes, we refer to the privacy policies of our Clients. In case you contact us with a question regarding Personal Data we process as Data Processor, we will refer you to the relevant Client who acts as Data Controller in that respect.

Acting as Data Controller:

Apart from the processing of Personal Data on behalf of our clients, we do collect and process some Personal Data for our own purposes – under which data regarding our Clients. In this respect, we act as “**Data Controller**” ourselves within the meaning of the Relevant Legislation.

Which Personal Data do we process as Data Controller and for which purposes?

As Data Controller, we collect and process the following Personal Data:

- Contact information of our Clients, e.g. names, business e-mail addresses and phone numbers;
- Payment details of our Clients;
- Login credentials of our Clients’ accounts;
- Contact information of potential clients, e.g. first- and last names, job description and business phone numbers/e-mail addresses and LinkedIn public profile information.

Client account

As a Client, you will be provided with a client account after registration through the Website. This personal account enables you to view records of the (Personal) Data we processed on behalf you as a Client.

How do we use the Personal Data that we process as Data Controller?

We use abovementioned Personal Data for the purposes described below:

- Contact information of Clients: We use this information to identify and contact our Clients regarding our collaboration.
- Payment details of Clients: We use this information to send invoices for the services we provide to our Clients.
- Login credentials: We use this information to create and manage the account of our Clients on our website.
- Contact information of potential clients: We use this information to approach marketing departments of companies with offers for our services.

We process the Personal Data regarding our Clients solely to offer and/or provide our Services to them, i.e. to detect and remove unlawful links to infringing content on the internet and report this to the specific Client.

Upon which legal basis do we process Personal Data?

As Data Controller, we may process the Personal Data of our Clients, e.g. contact information and payment details, based on the agreement with them. Regarding the contact information of potential clients, we have a legitimate interest to search for contact details of the marketing department of companies and approach them offering our services. In addition, we ask for informed consent by means of this Privacy Policy.

As Data Processor, we may process the Personal Data because our Clients, the Data Controllers, have a legitimate interest in finding and removing unlawful links to their copyright protected materials. Based on our "Data Processing Agreement" with our Clients, we may process the Personal Data relating to these services on their behalf.

For what period will we retain Personal Data?

Acting as Data Processor:

The Personal Data collected by us as on behalf of our Clients will be retained as long as the client uses our services and uses the personal data in that context. If the collaboration with our Client ends, we will keep the data for another period of 5 years. After this period, we will delete or destroy all Personal Data and copies thereof, unless we are legally obliged to keep the data for a longer period.

Acting as Data Controller:

The Personal Data we process as Data Controller will be deleted if they are no longer necessary for the fulfilment of the purposes mentioned above or are inaccurate. We will keep these Personal Data for a maximum of 5 years after the data have been last modified, unless we are legally obliged to keep the data for a longer period.

Who do we share your Personal Data with?

Acting as Data Processor:

On behalf of our Clients, we only process the Personal Data based on their instructions. We will never share these personal data with anyone, unless our Clients request us to do so.

It is however possible that we use "**Sub Data Processors**" (with permission of our Clients), e.g. for the storage of the data and the hosting of our Website. These Sub Data Processors must strictly follow our instructions and the instructions of our clients. Therefore, they will not use personal data for their own purposes. In addition to such storage and hosting providers, we use certain tools to provide our services to our clients. We make sure all of our Sub Data Processors comply with the relevant privacy legislation.

Acting as Data Controller:

We use Sub Data Processors for the processing of Personal Data for our own purposes as well.

The Data Processors we may use for the processing as Data Controller or, with permission of our Clients, as Data Processor are – for example: Active Campaign, Aircall, Amazon (AWS), Asana, AskNicely, Atlassian, Calendly, Dropbox, Freshdesk, Google, MailChimp, One, PandaDoc, PipeDrive, Postmark, Slack, Stripe,

SurveyMonkey, Sync, Twinfield, Typeform, WHMCS, Woodpecker and Zapier. Also these Data Processors must strictly follow our instructions and the instructions of our clients. Therefore, they will not use personal data for their own purposes.

Generic aggregated (non-personal) data

In order to make our Website and Services as optimally as possible, we may convert Personal Data into non-Personal Data and aggregate it with information collected from other data subjects. In such case the Data will be fully and irreversibly anonymized: they will not contain Personal Data.

How do we protect Personal Data?

We work hard to protect your Personal Data from unauthorized or unlawful access, alteration, disclosure, use or destruction. For example, we take the following measures to make sure the Personal Data is safe:

- We secure our network connection with Secure Socket Layer (SSL) technology;
- We encrypt all personal data;
- We restrict the access to the Personal Data to the purposes mentioned in this Privacy Policy;
- We limit the access to the Personal data to employees on a need to know basis;
- Two step verification is required to access the Personal Data.

Third party websites

You may find advertising or other (hyper)links on our Website that link to the websites, products and services of partners, suppliers, advertisers, sponsors, licensors or other third parties. We do not control the content or the links that appear on these websites and we are not responsible for the practices employed by websites linked to or from our Website. In addition, these websites, products and services, including their content and links, may be constantly changing. These websites, products and services may have their own privacy policies, user terms and customer service policies. Browsing and interaction on any other website, including websites that are linked to or from our Website, are subject to the terms and policies of that website.

Export of Data outside the European Union

We may transfer the Personal Data outside the EU, if our Clients ask us to do so or if one of our Sub Data Processors is located outside the EU. In case we transfer Data outside the EU, the Data will only be transferred to countries who provide an adequate level of protection that meets the EU-standards. For example, we will verify if that organization is a Privacy Shield Participant or is listed as third country whose level of protection is approved by the European Commission.¹ The transfer of Data outside the

¹ The European Commission has made a list of third countries whose level of protection is approved by the European Commission. Data transfers to the U.S. are considered adequate when based on the EU-

EU will always comply with the Relevant Legislation (such as article 76 section 1 of the DDPa and - from 25 May 2018 - chapter 5 of the GDPR).

Modifications to this Privacy Policy

We may update our Privacy Policy from time to time. When we change this Privacy Policy in a significant way, we will notify you via e-mail and post a notification on our Website along with the updated Privacy Policy.

Your rights and who to contact

As specified in and under the conditions of the Relevant Legislation, you have the right to tell (us) if you:

- would like to view and/or a copy of the Personal Data which are being processed by us as Data Controller about you, where they are being processed, who is receiving them, how long they will be saved by us and for what purpose;
- would like us to correct, update, shield or delete your Personal Data or restrict the processing therefrom in our records;
- wish to report any misuse of your Personal Data;
- have an objection against any processing of your Personal Data by us;
- think we are processing your Personal Data unlawfully. In this respect, you can file a complaint with the Dutch Data Protection Authority;

If you have any questions, comments or concerns about how we handle Personal Data, please contact us at privacy@link-busters.com. We strive to respond to messages and request within 5 days of receipt by us.

LINK-BUSTERS OPERATIONS B.V.,

trading under the name Link-Busters

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1058 EA Amsterdam
The Netherlands

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VAT number: NL852177811B01

E-mail: privacy@link-busters.com

U.S. Privacy Shield. The EU-U.S. Privacy Shield is an agreement between the U.S. Department of Economic Affairs and the European Commission on the exchange of personal data between companies in the EU and the U.S. The Privacy Shield has been in force since 1 August 2016. The Privacy Shield List enables European companies to verify whether data can be transferred to an U.S.-based company under the framework.