

Privacy and Cookie Policy for 23 Photo Sharing

The policy covers the use and interaction with 23 Photo Sharing (the “Service”) provided by TwentyThree Aps (“TwentyThree”, “us”, “we”, or “our”). This document informs you of our policies regarding the collection, use, and disclosure of personal data when you use the Service and the choices you have associated with that data.

By using the Service, you agree to the collection and use of information in accordance with this policy. If you do not agree with the data practices described in this Privacy Policy, you should not use the Service.

We may update this policy from time to time. We will notify you of any changes by posting the new Privacy Policy on <http://www.23hq.com/23/privacy>. While we will notify you of any material changes to this Privacy Policy, we encourage you to review this Privacy Policy periodically.

Definitions

“*Personal Data*” is data about a living individual who can be identified from those data.

“*Usage Data*” is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

“*Data Controller*” means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed. For the purpose of this policy, we are a Data Controller of your Personal Data.

“*Data Processors*” means any natural or legal person who processes the data on behalf of us as the Data Controller. We use the services of third-party company in order to process your data more effectively.

“*Data Subject*” is any living individual who is using the Service and is the subject of Personal Data.

Types of data collected

We collect several different types of information for various purposes to provide and improve the Service to you.

Personal data

While using the Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Photos uploaded to your user account
- IP address
- Address, State, Province, ZIP/Postal code, City
- Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

Usage data

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of the Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Data from tracking cookies

We use cookies and similar tracking technologies to track the activity on the Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze the Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of the Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate the Service.

- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

Use of data collected

We use the collected data for various purposes:

- To provide and maintain the Service, for example by sharing content within the sharing parameters configured by the service.
- To notify you about changes to the Service and changes in our offering.
- To allow you to participate in interactive features of the Service when you choose to do so.
- To provide customer support.
- To gather analysis or valuable information so that we can improve the Service.
- To monitor the usage of the Service.
- To detect, prevent and address technical issues.
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.

Legal basis for processing of personal data under the GDPR

If you are from the European Economic Area (EEA), TwentyThree legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

TwentyThree may process your Personal Data because:

- You have given us permission to do so.
- The processing is in our legitimate interests and it's not overridden by your rights.
- We need to perform a contract with you.
- To comply with the law.

Retention of data

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

TwentyThree will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or

to improve the functionality of the Service, or we are legally obligated to retain this data for longer time periods.

Transfer of data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside the European Union and choose to provide information to us, please note that we transfer the data, including Personal Data, to the European Union and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure of data

Under certain circumstances, TwentyThree may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

TwentyThree may disclose your Personal Data in the good faith belief that such action is necessary to comply with a legal obligation; to protect and defend the rights or property of TwentyThree; to prevent or investigate possible wrongdoing in connection with the Service; to protect the personal safety of users of the Service or the public; or to protect against legal liability.

Data security

We use a variety of security technologies and procedures to help protect your Personal Information from unauthorized access, use or disclosure. We secure the Personal Information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. All Personal Information is protected using appropriate physical, technical and organizational measures.

Your rights under the GDPR

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. TwentyThree aims to take all reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please email rights@twentythree.net.

You hold specific data protection rights under the GDPR:

- You have the rights under the GDPR to access, update or to delete the information we have on you.
- You have the right to have your information rectified if that information is inaccurate or incomplete.
- You have the right to object to our processing of your Personal Data.
- You have the right to request that we restrict the processing of your personal information.
- You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- You also have the right to withdraw your consent at any time where TwentyThree relied on your consent to process your personal information.

Please contact rights@twentythree.net with any request exercising these rights.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Service providers

We employ third party companies to provide services to the Service. We use services to monitor and analyze the use of the Service. We use remarketing services to advertise on third party websites to you after you visited the Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to the Service. We use a global content delivery network to optimize delivery of the Service and its content.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Links to other sites

the Service contains links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Children's privacy

This Site does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

Further information

We hope that this document has clarified our use of and practises around personal data.

If there is any that you not sure of or that need further clarification, we highly encourage you to contact us through rights@twentythree.net. This includes questions regarding data compliance and your personal in relation to TwentyThree.

Revision 2, May 2018

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