

# PRIVACY POLICY

Boogiz company reg. no. 40752757



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## Privacy policy - English version

Welcome to Boogiz (the "Platform"). We are committed to protecting and respecting your privacy and this policy sets out the basis on which the personal data we collect from you or that you provide to us is processed by us. When we refer to "Boogiz", "we" or "us" in this Privacy Policy, we mean Boogiz ApS, a Danish company, company reg. no. 40752757.

## 1. Privacy Policy - Users residing in the EEA, UK or Switzerland

## 1.1. The data controller

The data controller for the collection, processing and use of your personal data on www.boogiz.app is Boogiz ApS, Lyrskovgade 10, 3rd floor right, 1758 Copenhagen V, company reg. no. 40752757.

## 1.2. When does Boogiz collect information?

We only collect personal data in cases where it is relevant to us or our business partners, and we will only collect personal data if it is relevant to your activity at Boogiz.

When collecting, processing and using your personal data, we always comply with all relevant legal provisions.

We will only retain your personal data for as long as we are either under a legal obligation to do so or for as long as it is relevant for the purpose for which it was collected.

## 1.3. What information does Boogiz collect?

We collect and use the following information about you:

## Your profile information

You provide us with information when you register on the Platform, including your username, date of birth, email address and/or phone number, information you provide on your user profile and your photo or your profile video.



#### User content and behavioural information

We process the content you generate and view on the Platform, including the preferences you set (such as language preferences) and photos and videos you upload ("**User Content**"). We collect information through surveys, challenges and competitions that you participate in. We also collect information about your use of the Platform, such as how you use the Platform, including how often you use the Platform and how you interact with the content we show you, the ads you see, videos you watch and problems you encounter, the content you like, the content you save in "Favourites", the words you search for and the users you follow.

We review User Content for possible content moderation to enforce our community guidelines, comply with our legal obligations, and prevent and respond to abuse, fraud, illegal activity and other potentially harmful content on the Platform.

## 1.4. Information from other parties

#### Business partners

If you choose to register as a User of the Platform via information on a social media account (e.g. Facebook, Twitter, Instagram, Google), you provide us (or allow your social network to provide us) with your username and your public profile. Likewise, we share certain information with that social network, such as your app ID, password and the referring URL.

## Technical information we collect about you

We collect certain information from you when you use the Platform, including when you use the app without an account. Such information includes your IP address, event IDs (which allow us to determine which devices to deliver messages to), mobile operator, time zone settings, identifier for advertising purposes and the version of the app you use. We also collect information about the device you use to access the Platform, such as device model, device system, device network type, device ID, your screen resolution and operating system, audio settings and connected audio devices. If you log in from multiple devices, we are able to use your profile information to identify your activity across devices.

## Location information

When you use the Platform on a mobile device, we collect information about your location to tailor your experience. We derive your approximate location based on your IP address. In certain jurisdictions, we may also collect Global Positioning System (GPS) information.



#### In-app purchases of dance content

If you make in-app purchases, please read our Terms and Conditions of Use. Your purchase is completed through your Apple iTunes or Google Play account. We do not collect any financial or invoicing information from you in connection with such a transaction. Please refer to the relevant app store's terms and notices for information on how your data is used. We record the purchases you make, the time of those purchases and the amount you spend so that we can credit your account with the correct value in coins.

#### Information you provide to us

We collect information that you provide to us in response to a survey. If you respond to a Boogiz survey, your individual responses will be used for the purpose of the survey and may be shared with other organisations as we have explained to you when you participate in a survey. We may also use aggregated data from these surveys in the same way.

We may also collect information that you provide to us via correspondence.

#### Proof of identity or age

Sometimes we ask you to prove your identity or age in order to use certain features, such as verified accounts or when applying for a "Pro Account".

## 1.5. Other recipients of personal data

We do not sell your personal data to third parties and we do not transfer your personal data to third countries. However, see section 1.9.

We host our website with AWS, which acts as our data processor. All personal data that you provide on our website will be stored in AWS data centres.

#### **1.6.** Data processors

We use companies as suppliers in order to provide our services in the best possible way. These external suppliers are data processors and in some cases process personal data in connection with their provision of services to us. Our data processors only process personal data according to our instructions and in accordance with the legal requirements for data processors.

We have entered into data processing agreements with our data processors, which is our guarantee that they comply with applicable rules on the protection of your personal data.



## 1.7. How will Boogiz use the information collected?

We use the information we collect about you on the legal basis described below.

In accordance with, and to fulfil our contract with you, we use your information:

- to provide the Platform and related services
- to notify you about changes to our service
- to provide user support to you
- to enforce our Terms and Conditions of Use and policies
- to administer the Platform, including problem resolution
- to personalise the content you receive and deliver tailored content to you that will be of interest to you
- to enable you to share user content and interact with users
- to enable you to use our messaging feature if you choose to use it and are 16 years of age or older
- to enable you to participate in the programme containing virtual items
- to communicate with you.

To comply with our legal obligations and to perform tasks of public interest or to protect the vital interests of our users and others, we use data to help us prevent and respond to abuse, fraud, illegal activity and other potentially harmful content on the Platform.

In accordance with our legitimate interest in providing an efficient and dynamic Platform, we may use your information:

- to achieve security, including by reviewing user content, messages and associated metadata for breaches of our house rules (introducing Boogiz) and our Terms and Conditions of Use
- to ensure that content is presented in the most effective way for you and your device



- to understand how people use the Platform so that we can improve, promote and develop it
- to promote trending topics, hashtags and campaigns on the Platform
- to perform data analysis and test the Platform for stability and security
- to verify your identity, for example to enable you to get a "verified account", and your age, for example to ensure that you are old enough to use certain features
- to provide non-personalised ads, which ensures that many of our services are free
- to identify your interests in order to optimise our ads, which, to the extent you have consented to personalised ads, may be based on the information provided to us by our advertising partners
- to measure the effectiveness of the adverts you see on our Platform
- to inform our algorithms so that we can deliver the most relevant content to you and prevent crime and misuse of the Platform
- to conduct research regarding our services, products and features
- to enable you to use the interactive features of the Platform
- to enable you to socialise on the Platform. For example, we may allow other users to identify you through the "Find Friends" feature or through the contacts in their phone, or connect you with other users by tracking with whom you share links. In cases where we process your data to fulfil our legitimate interests, we perform a balancing test to ensure that the use of personal data is genuinely necessary for us to achieve our business purposes. When performing this balancing test, we also take into account the data protection rights of our users and implement appropriate measures to protect their personal data.

## **1.8.** How Boogiz shares the collected information

We share your information with the following selected third parties:

#### Business partners

• If you choose to register as a User of the Platform via information on a social media account (e.g. Facebook, Twitter, Instagram, Google), you provide us (or allow your social network to provide us)



with your username and your public profile. Likewise, we share certain information with that social network, such as your app ID, password and the referring URL.

- If you choose to share content on social media platforms, the video, your username and any text associated with the post will be shared on that platform, or in the case of sharing via instant messaging platforms, such as WhatsApp, a link to the content will be shared.
- In order to provide the "Find Friends" feature based on your Facebook contact overview, we share data with Facebook to enable this feature.

#### Payment providers

- If you are under the age of [13], your parents must authorise the purchase of coins. They will receive a notification regarding authorisation of purchases via NemID.
- If you are 18 years or older and choose to purchase virtual items, we share data with the relevant payment provider to enable this transaction. We share a transaction ID, which enables us to identify you and credit your account with the correct value in coins once you have made the payment.

#### Service providers

 We provide information and content to service providers that support our business, such as cloud service providers and content moderation service providers to ensure that the Platform is a safe and enjoyable place.

#### Law enforcement/legal obligations

- We may share your information with law enforcement authorities, government authorities or other third parties if we believe we are legally required to do so, or if such use is reasonably necessary to:
  - comply with a legal claim or request
  - enforce our Terms and Conditions of Use and other agreements, policies and standards, including investigation of a potential violation
  - detect, prevent or otherwise address abuse, fraud, illegal activity or security or technical issues; or



 protect our, our users', a third party's or the public's rights, property or safety as may be required or permitted by law (including exchanging information with other companies and organisations for fraud protection and credit risk reduction purposes).

#### Public profiles

If your profile is public, your content will be visible to everyone on the Platform and can also be accessed or shared by your friends and followers, as well as third parties such as search engines, content aggregators and news sites. You can decide whether other users can learn your dance every time you upload a video.

#### 1.9. Your rights

We offer you options to control and manage the personal data we hold about you.

You have the following rights:

- Access to your data: You can ask us, free of charge, to confirm that we process your personal data and to provide you with a copy of your personal data.
- Erasure of your data: You can ask us to erase some or all of your personal data.
- Amend or correct data: You can ask us to amend or correct your data. You can also make amendments using in-app controls and settings.
- Portability: You can request a copy of your personal data in a machine-readable format.
- Object to or restrict the use of information and withdraw your consent: You can ask us to stop using all or part of your information, e.g. if we have no legal right to continue using it. You can ask us to stop processing your personal data for direct marketing purposes, withdraw your consent or ask us to stop making automated individual decisions, including profiling. If you object to such processing, we ask you to provide the reason for your objection so that we can scrutinise the processing of your personal data and balance our legitimate interest in the processing against your objection to this processing.

Before we can respond to a request to enforce one or more of the rights listed above, you may be asked to verify your identity or account information.

For information on how to make these requests, please contact us using the contact form below and we will review your request taking into account applicable laws. Boogiz will be responsible for responding to your request within the deadlines established by law.



## **1.10.** Where does Boogiz store your information?

The personal data we collect from you may be transferred to and stored at a destination outside the European Economic Area ("EEA").

Where we transfer your personal data to countries outside the EEA, we will do so in accordance with the European Commission's Model Contracts for the Transfer of Personal Data to Third Countries (e.g. Standard Contractual Clauses) pursuant to Commission Decision 2004/915/EC or 2010/87/EU (as applicable) or in accordance with a replacement mechanism authorised under EU law. To obtain a copy of these standard contractual clauses, please contact us at: maja@boogiz.app.

## **1.11.** How long does Boogiz keep your information?

We will retain your information for as long as necessary to provide the service to you, so that we can fulfil our contractual obligations to you and enforce our rights in relation to the information involved. In cases where we do not need your information to provide the service to you, we will only retain it for as long as we have a legitimate business purpose for retaining such information.

If you ask us to delete your account, it will be deleted no later than 45 days after your request.

In each case, there are also situations where it may be necessary for us to retain your information for a longer period of time in accordance with our legal obligations or if it is necessary in connection with legal proceedings.

## **1.12.** Security of your information

We take steps to ensure that all your information is treated securely and in accordance with this Privacy Policy. Unfortunately, the transmission of data via the internet is not completely secure. Although we do our best to protect your personal data, e.g. by encryption, we cannot guarantee the security of the information sent via the Platform, which means that any transmission is at your own risk.

We have appropriate technical and organisational measures in place to ensure a level of security appropriate to the risk that may be posed to you and other users. We maintain these technical and organisational measures and will change them from time to time to improve the overall security of our systems.

We will from time to time provide links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to one of these websites, please be aware that these websites have their own



privacy policies and that we do not accept any responsibility or liability for these policies. Please read these policies before submitting any information to these websites.

## 1.13. How will we notify you of future changes to our privacy policy

We will notify you of material changes to this Policy by a notice delivered via our Platform or otherwise. The "Last Updated" date at the top of this Policy will indicate the effective date of such changes.

## 1.14. Contact information

Boogiz provides the Platform and related services and jointly processes personal data in the manner described in this Policy and in our Terms and Conditions of Use. For users of the Platform in the EEA and Switzerland, Boogiz is the service provider in accordance with our Terms and Conditions of Use, and if you are a UK resident, the provider of the Platform is Boogiz.

If you have any questions or complaints about this Policy or if you wish to contact the Boogiz Data Protection Officer, you can contact us at: maja@boogiz.app. You can also contact us at the following postal address:

For users residing in the European Union, the European Economic Area and Switzerland: Boogiz ApS, Lyrskovgade 10, 3rd floor right, 1758 Copenhagen V, company reg. no. 40752757, [maja@boogiz.app]

For users in the UK: Boogiz ApS, Lyrskovgade 10, 3rd floor right, 1758 Copenhagen V, company reg. no. 40752757, maja@boogiz.app]

If your complaint is not resolved by contacting us, you have the right to complain to your local data protection authority.

## 2. Privacy Policy for children - Residents of the EEA, UK or Switzerland

Boogiz is intended for use by both adults and children under the age of 13. To ensure that Boogiz complies with the legal requirements for providing information services to children under the age of 13, Boogiz requires you to state your age when registering.

If we rely on your consent as a legal basis for the processing of personal data that we carry out, we require consent from the relevant holder of parental rights and responsibilities before we collect, use and utilise your data.



If you are under 13 years old in Denmark, or under 16 years old in other countries, Boogiz requires the relevant holder of parental rights and responsibilities to provide the consent necessary for us to provide the Platform and in this context collect, use and store your data.

In Denmark, Boogiz endeavours to ensure that it is the holder of parental rights and responsibilities who provides the consent on behalf of the child by requiring the consent to be verified through the parent's credit account information, which in Boogiz's opinion constitutes reasonable efforts to verify that the holder of parental rights and responsibilities provides the consent.

[For EEA and UK users]:

It is up to Boogiz to limit how we collect, use and store some of the information from EEA and UK users between the ages of 13 and 16. In some cases, this will mean that Boogiz will unfortunately not be able to provide certain features of the Platform to these users.

If we rely on your consent as a legal basis for the processing of personal data that we carry out, we require consent from the relevant holder of parental rights and responsibilities before we collect, use and utilise your data.