

PRIVACY POLICY

This Privacy Policy was last updated on: 19.08.2024

INTRODUCTION

We are SND Media, registered under the laws of Malta, hereinafter **“We“**, **“Company”** or **“SND Media”**, strictly follow the applicable laws and regulations related to Personal Data protection in countries where the Company operates.

WE ARE COMMITTED TO SAFEGUARDING PRIVACY AND WILL NOT MISUSE OUR USERS’ DATA.

The information below will help the user better understand:

- what personal information we collect;
- why we collect it and how we use it;
- purposes and legal basis for the processing
- how this information is shared;
- security measures applicable
- retention periods
- personal data transfers
- your rights;
- what are cookies;
- other important information;

The Company controls and manages – <https://sndmedia.io> (hereinafter the **“Website”**) which may collect particular data for its business purposes.

This Privacy Policy applies to all users that are visiting the Website. Website and services are designed for people who are at least 18 years old.

We will not knowingly collect any Personal Information from children without proper parental consent.

WHAT PERSONAL INFORMATION DO WE COLLECT?

The Company collects the following categories of data:

- contact details such as your first name, last name, phone number, and email address;
- data that identifies you such as your IP address, login information, browser type, and version, time zone setting, browser plug-in types, geolocation information about where you might be, operating system and version;
- data on how you use the website such as your URL clickstreams (the path you take through the website), goods/services viewed, page response times, download errors, how long you stay on webpages, what you do on those pages, how often, and other actions.

WHY WE COLLECT YOUR PERSONAL DATA

The Company collects your personal data in order to:

- provide services;
- keep the Website running;
- improve the Website;
- for marketing purposes (with your consent).

PURPOSES AND LEGAL BASIS FOR THE PROCESSING

Before proceeding to the processing of your personal data (as described above) we evaluate the data that we collect and after that, we determine the legal basis of processing.

We use the following basis to collect and process your data:

- performance of a contract;
- compliance with legal obligations; - our legitimate interest, and - your consent.

Providing Services

Details: the Company needs to provide services accessible via the Website. Legal basis: Consent; Contract; Legitimate Interests.

Keeping the Website running

Details: managing your login and authentication, remembering your settings, hosting, and back-end infrastructure.

Legal basis: Contract; Legitimate Interests.

To Improve the Website

Details: testing features, interacting with feedback platforms and questionnaires, managing landing pages, heat mapping the Website, traffic optimization, and data analysis and research, including profiling and the use of machine learning and other techniques over your data and in some cases using third parties to do this. Legal basis: contract; legitimate Interests.

Marketing purposes

Details: sending you emails and messages about new functions, goods and services, and content. Legal basis: Consent.

Prevent fraud

Details: cookies.

Legal basis: Legitimate Interests.

Support Heroes will not sell or provide your data to any third party where you have not provided your consent to do so. All other data of all users within the European

Economic Area is processed in accordance with the General Data Protection Regulation (GDPR) 2018 and other applicable laws.

PERSONAL DATA SHARING

We respect and protect your private information. We restrict access to Personal Information to Company employees, contractors, and agents who need this information to perform their job duties. Those who have access to Personal Information are subject to strict contractual confidentiality obligations, Company's internal policies, and Information Security Policy.

SECURITY MEASURES

We have already implemented several security features that are intended to help prevent the unauthorized release of or access to the user information we collect.

To protect your Personal Information, we restrict access to it to Company employees, contractors and agents who need it to perform their job duties. In addition, those who have access to Personal Information are subject to strict contractual confidentiality obligations and may be disciplined or have their contracts terminated if they fail to meet these obligations.

We protect your information by using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Nevertheless, no one can guarantee absolute protection of your Personal Data. You must also do your part in protecting the data, systems, networks, and services that you are using.

If you have reason to believe that your interaction with us is no longer secure, please immediately notify us by contacting us [here](#).

RETENTION OF PERSONAL DATA

We only retain Personal Data for as long as it is necessary. In retaining Personal Data, we consider:

- the duration of the purposes that we collected it for, and importantly the duration that we are obliged to provide the relevant services;
- fulfilling and managing our relationship with you;

We also retain Personal Data for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements and guidance.

PERSONAL DATA TRANSFER

Information we collect or permit third parties to collect may be transferred to, stored, and processed outside your country of residence in any country or territory where one or more of our affiliated group companies, third-party service providers or advertising

companies or advertising networks are located or maintain facilities, respecting the contractual obligations.

When your information is moved from your home country to another country, we ensure that such a transfer is done legally. For users based in the EEA, we may rely on the “**Model Clauses**” a standard document created by the European Commission to facilitate data transfers while ensuring that safeguards are put in place for personal information.

By using the Services, you consent to the transfer of your personal information as described in this Privacy Policy.

YOUR RIGHTS

Privacy legislation provides consumers with rights regarding their personal information. This section describes your rights and explains how to exercise those rights.

We fully respect your privacy and will use the minimum personal data required to provide you with our services, improve our products and services, and personalize our recommendations. You can review and manage your privacy settings by contacting our Customer Support via email compliance@supportheroes.io.

Right to Access. You can request an explanation of the personal data we process about you. Also, you can request a copy of your personal data undergoing processing. Right to Rectify. You can correct any inaccurate data about you or update your personal data.

Right of Data Portability. You have a right to receive the personal data concerning you, that you provided to us. You can make a request to transmit this data directly to another data controller in a structured, commonly used, and machine-readable format. We will transmit your data directly to another controller in cases where it is technically feasible.

Right of Erasure. You have a right to delete all personal data that you have provided to us. In case you request removal of your personal data by our Customer Support via email or call as prescribed above, it may take up to thirty (30) days to implement your request.

Note, we may retain certain information as required by law and for legitimate business purposes permitted by law.

Right of Restrict Processing. You can request us to temporarily or permanently stop processing all or some of your personal data.

Right to Object Processing. You can, at any time, object to the processing of your personal data on grounds relating to your particular situation. For example, you have a right to object to your personal data being processed for direct marketing purposes.

Right to Lodge Complaints. You have a right to file a complaint with a supervisory authority in relation to Support Heroes Support Services, usage of your personal data. Please be aware that this opt-out does not prohibit our disclosure of personal data for any purpose other than direct marketing. The data we process and share may include your name and email address.

COOKIES

The cookies described below are used to improve the website and do not contain any personal information that would allow us to identify you, such as your name or other contact details.

There are four types of cookies that may be used during your visit to our website:

- session cookies, which are stored only temporarily during a browsing session and are deleted from your device when the browser is closed;
- persistent cookies, which are saved on your computer or device for a predefined period and do not depend on the time when the browser is closed;
- first-party cookies, which are set by a specific website and can be read-only by that website (for example, when you get some cookies from our website, then only our website can recognize them); and
- third-party cookies are set by an organization different from us, such as a thirdparty analytics company, who sets its cookies to perform this service.

First of all, please note that most browsers accept cookies by default. Anyway, you have the right to accept or stop cookies from being stored on your device at any time by modifying the settings in your web browser to reflect your cookie preferences.

You can control and/or delete cookies as you wish – for details, see aboutcookies.org. You can delete all cookies that are already on your computer, and you can set most browsers to prevent them from being placed. However, in this case, you may have to manually adjust some preferences every time you visit a website. As a result, some services and functions may not work.

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

Please bear in mind that disabling all our cookies in your browser settings may lead to failure in the operation of certain sections or features of our Website. Therefore, we recommend using the Cookie Settings on our Website instead of disabling them.

- Information about cookies in [Internet Explorer](#)
- Information about cookies in [Chrome](#)
- Information about cookies in [Firefox](#)
- Information about cookies in [Safari](#)
- Information about cookies in [Opera](#)

CHANGES TO THIS NOTICE

We may change this Privacy Policy. The “Effective Date” section at the top of this page states when this Privacy Policy was last revised. Any changes to this Privacy Notice will become effective when we post the revised Privacy Policy on this page.

Your use of the Support Heroes Services following these changes means that you accept the revised Privacy Policy. We encourage you to periodically review this Privacy Policy to stay informed about how we collect, use, and share Personal Information.