

## PRIVACY POLICY

This privacy policy ("Privacy Policy") applies to the treatment of personally identifiable information ("Personal data") submitted by, or otherwise obtained from, you in connection with the contest "Masha's Advent Calendar" ("Contest"), holding by us on an official web page on the Internet dedicated to the Contest, namely [advent.mashabear.com](http://advent.mashabear.com). ("Website").

Animaccord Ltd and its affiliates (collectively, "Animaccord", "we", "us", and "our") respect your privacy. Please read our Privacy Policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your personally identifiable information.

We declare that your Personal data will be processed in accordance with the provisions of the regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("GDPR") and Data Protection Act of 2018.

### Consent

By participating in the Contest you are consenting to our collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (provision, access), distribution in cases and to the extent provided for by the applicable legislation of the UK, depersonalization, blocking, deletion and destruction of data, in accordance with this Privacy Policy of any Personal Data or other information received by us as a result of such use (art. 6 (1) of the GDPR).

### When Do We Collect Personal Data & How Do We Use It?

We collect personal information from you when you place your application on the Website, together with uploading the results of the Tasks as defined in the applicable Terms & Conditions, and fill out a form or enter information on our Website.

Personal data can be processed for several different purposes on compliance with legal obligations, lawful basis including the basis of legitimate interest, encompassing:

- to the extent and the purposes necessary for the organization of the Contest, the delivery of the Prizes, the execution of the results of the Contest (art. 6 (1) (a) of the GDPR);
- for the purposes of the legitimate interests pursued by the Organizer or by a third party, i.e. for the establishment, exercise or defense of legal claims and promoting the activity of the Organizer and related entities (art. 6 (1) (f) of the GDPR).
- to comply with a legal requirement, to protect your vital interests, to protect the security or integrity of our databases or the Website, to take precautions against legal liability.

### What Personal Data Do We Collect?

*Personal data* means any data that, either on its own or jointly with other data, can be used to identify a natural person. You directly provide us with such data when you use our Websites, or interact with us by, for example, directing your inquiries, receiving additional information or services from us.

If you place your application on the Website, together with uploading the results of the Tasks, and fill out a form or enter information on our Website, we may collect the following *personal data*:

- first and last name;
- email address or telephone;

- address and postcode;
- country and another geolocation information;
- date of birth;
- gender;
- any information you submit as part of the Contest.

We sometimes supplement the information you provide us with information that is received from third parties. For instance, if inaccurate postal or zip codes are received, we may use third-party software to correct them.

Please note that if you decide not to provide certain information which we have indicated is mandatory, in some circumstances, this may mean we are unable to provide you with a certain service.

If you are just browsing our Website, we collect the same basic information, the non-personal data, that most websites collect.

The *non-personal data* we collect about all visitors to our Website include:

- the visitor's browser type,
- language preference,
- referring site,
- additional websites requested,
- and the date and time of each visitor request,
- information about your device (such as your IP address or another device identifier) and your usage or the services through cookies (and similar technologies) as further described below.

### **Third-Party Links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and we are not responsible for their privacy policies. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### **Cookies & Similar Technologies**

To ensure our Website works correctly, we may at times place a small piece of data known as a cookie on your computer or mobile device. A cookie is a text file stored by a web server on a computer or mobile device. The content of a cookie can be retrieved or read-only by the server that creates the cookie. The text in a cookie often consists of identifiers, site names, and some numbers and characters. Cookies are unique to the browsers or mobile applications you use and enable websites to store data such as your preferences.

Like many other websites, we use cookies to improve user experience. Session cookies are deleted after each visit, while persistent cookies remain in place across multiple visits. Cookies allow Website to remember your settings such as language, font size on your computer or mobile device, or other browser preferences. This means that a user does not need to reset preferences for every visit. On the contrary, if cookies are not used, Website will treat you as a new visitor every time you load a web page. We will not use cookies for any purposes not stated in this Privacy Policy.

Visitors who do not wish to have the Cookie Policy applied on their computer should make the necessary changes using their browser instruction.

### **How We Share, Disclose or Transfer your Personal Data**

We may share your personal data with other partners when services are provided by partners authorized by Animaccord. In addition, as a global company, we may share personal data with Animaccord affiliates and subsidiaries. We may share your information with third parties that perform services for us or on our behalf where (a) this is required for the purpose of holding the Contest etc. for complying with legal obligations (b) the law requires such disclosure i.e. to regulatory authorities or (c) you provided with authorization.

We may also disclose your personal data where we are required to do so by applicable law, by a governmental body or by a law enforcement agency. We may also disclose personal information to protect the rights, property or safety of us or our users, or others, and in order to enforce or apply our terms and conditions (this includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction) or where we are required to do so by applicable law, by a governmental body or by a law enforcement agency.

All personal data obtained is processed by Animaccord and for the purposes of IT hosting and maintenance this information and data is stored in servers located within the European Union. The third parties do not have any access to your personal data and Animaccord does not share your personal data information with any third parties, unless : (a) this is required for the purposes of compliance with the applicable laws regulations, and/or (b) the local authorities require such disclosure as part of any investigation or pursuant to the applicable laws on Anti-Money laundering and/or (d) you have expressly provided you written consent to disclose such data to a third party.

We do not subject your personal data to any automated decision making.

### **Data Retention & Security of your Personal Data**

We will hold your personal information for the longest of the following periods:

- (a) as long as is necessary for the relevant activity;
- (b) any retention period that is required for the purposes of satisfying any legal, accounting or reporting requirements.

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the information you provide us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can guarantee against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. We cannot guarantee complete security if you provide personal information.

We can process your personal data using automated data processing tools. We may process your personal data both independently and with the involvement of its affiliates located outside European Union taking into account that personal data will not be controlled by such affiliates and will be collected without storage solely for the purpose of processing. We ensure that our affiliates provide an adequate level of protection for such personal data.

Your personal data will be stored for the duration of the Contest, and after its end, for the period of limitation of claims, as provided by applicable UK law. Data processed on the basis of consent will be processed until its withdrawal.

### **How to Access & Control Your Personal Data**

It is your responsibility to ensure that all personal data submitted to Animaccord is correct. We maintain the accuracy and completeness of personal data and keeping the data up-to-date.

To the extent required by applicable law, you may have the rights:

- to access certain personal data we maintain about you,
- to request that we update or correct inaccuracies in that data,
- to object or restrict to our use of your personal data, and
- to ask us to delete your personal data from our database.

If you wish to exercise any of these rights, please contact us at [competition@animaccord.com](mailto:competition@animaccord.com), by sending a scanned copy (electronic image) signed statement. The application may be made in a free form and must contain information that allows to identify you. We may decline the request if we have reasonable grounds to believe that the request is a fraudulent, unfeasible or may jeopardize the privacy of others.

After receipt of the withdrawal of consent to the processing of personal data from you, Animaccord is obliged to stop processing of the data and, if the preservation of personal data is no longer required for the purposes of processing personal data, destroy personal data within a shortest period possible from the date of receipt of the specified withdrawal, except for cases when – according to law provisions – Animaccord has the right to process personal data without the consent of the personal data subject.

However, withdrawal does not affect the legitimacy and effectiveness of how we process your personal data based on your consent before the withdrawal is made; nor does it affect any data processing based on another justification other than your consent, and we will provide you with further information regarding how to exercise these rights.

### **Right to Complaint**

If you are not happy with the way we treat your personal data, please contact us by emailing us at [competition@animaccord.com](mailto:competition@animaccord.com).

If you think the way we process your personal information does not comply with applicable data protection laws, you can contact the relevant competent data protection authority. You can object to the processing as well as the right to data portability and lodge a complaint with a supervisory authority (which in the UK is the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk))).

We would appreciate the chance to deal with your concerns before you approach the relevant authorities so please do contact us at first instance.

### **Time limit to respond**

We will always try to respond to all legitimate requests the soonest practicable. If your request is particularly complex or you have made a number of requests this may take longer. In this case we will notify you and keep you updated.

We can refuse to comply with a data subject access request if it is manifestly unfounded or excessive, taking into account whether the request is repetitive in nature.

**Questions**

If you have any questions regarding this Privacy Policy or would like to exercise any of the above rights, please contact us by e-mail: [competition@animaccord.com](mailto:competition@animaccord.com).

IMPORTANT: BY SUBMITTING DATA TO US AND/OR USING OUR WEBSITE YOU ACCEPT AND AGREE THAT ALL PERSONAL DATA THAT YOU SUBMIT MAY BE PROCESSED BY US IN THE MANNER AND FOR THE PURPOSES DESCRIBED IN THE FOLLOWING PRIVACY POLICY. THIS PRIVACY POLICY INFORMS YOU ALSO ABOUT DATA PROTECTION RIGHTS. WE RESERVE THE RIGHT TO MAKE CHANGES TO THIS POLICY AT ANY TIME AND FOR ANY REASON AND POST THE UPDATED PRIVACY POLICY ON OUR WEBSITE.