

# # SOCIALDATABASE

## PRIVACY NOTICE

**SocialDatabase (version 10 August 2020)**

### 1. Who are we?

This policy describes SocialDatabase's use of your data. Socialdatabase (Dutch Chamber of Commerce 58951326) is private company with limited liability under dutch law whose registered office is at Slego 1A, in 1046BM Amsterdam hereinafter referred to as **SocialDatabase, we** or **us**

We are a company that specializes in creating customized audiences, consisting of Twitter users, in order for other companies to send you targeted advertisements on Twitter. In order to create such customized audiences, we collect personal data from the Twitter public database in our own secure database, located in the Netherlands. This means that if you have a public Twitter profile, we may collect and process your personal data.

The privacy and protection of the personal data we collect about you is important to us and we process your data in accordance with applicable data protection laws. In this Privacy Notice we would like to explain to you in more detail which personal data we collect and process from Twitter in connection with our customized audiences advertising services and how we use the personal data we collect.

### 2. What data do we collect?

We do not collect any personal data directly from you. **We collect your personal data indirectly, through a publicly accessible source; namely via Twitter**, using application programming interface (or "API") technology. Such personal data include:

- your Twitter account username;
- your Twitter @handle;
- your Twitter ID number;
- your list of followers;
- your list of following;
- your profile information;
- information about your tweets (such as date and time created, content and application and version of Twitter tweeted from);
- the list you created on your Twitter account;
- retweets; and (if provided) language and location information.

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As mentioned, we only collect personal data that is publicly available and accessible on Twitter – i.e. if you have enabled "[Protect your Tweets](#)" on Twitter, we do not process your personal data.

In addition we exclude, and therefore do not process any personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation and personal data relating to criminal convictions and offences.

### 3. For what purposes do we use your data?

We process your personal data for the following purposes:

- As required by us to enable our business and pursue our legitimate interests. In particular we use your data for the following purposes:
  - we process your personal data to enrich our secure database with an up-to-date and real-time copy of the public Twitter database;
  - we process your personal data for marketing purposes, more in particular to (i) identify Twitter users who are likely to be interested in the products and services of our (potential) customers and (ii) to enable our customers to provide you with personalized and relevant advertisements on your Twitter feed.
- In compliance with applicable laws and protection of our legitimate business interests and legal rights, including, but not limited to, use in connection with legal claims, compliance, regulatory, investigative purposes (including disclosure of such information in connection with legal process or litigation).

### 4. What is the legal basis for our processing of your data?

The processing by us of your personal data as described above for the purpose of personalized and targeted advertising is based on our legitimate interests. The processing is aimed at composing a customized audience on Twitter in order to enable our customers to use their marketing efforts as focused and as effective as possible.

In the performance of processing your personal data for our legitimate business interests we have, to the greatest extent possible, taken all measures to minimize

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the impact such processing has and will have on you and your rights and interests involved.

Additionally, our aim (with such targeted advertising by means of customized audiences) is to ensure that you receive promotional messages which are actually relevant to you, instead of (only) messages with little to no relevance.

If you do not or no longer wish to receive any personalized (targeted) advertisements on your Twitter account from our customer (or other advertisers), Twitter provides you the means to object to such processing via your "[privacy and safety settings](#)" in your Twitter account.

## 5. Who will we share this data with?

We do not share personal data with any external service providers. All services necessary to perform the processing operations are performed by us only.

Any personal data collected and processed by us are also not shared with any of our customers.

We share (some of) your personal data with Twitter, namely Twitter ID numbers. We will only share this data with Twitter in a secure manner. Twitter is regarded as a separate controller, who provides its own separate service to our customer. Twitter re-creates the customized audience on the Twitter platform as a "tailored audience" for the benefit of the customer and enables the customer to send its advertising campaigns to the customized audience, in accordance with the Twitter terms and conditions.

Personal data may be shared with government authorities and/or law enforcement officials if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

## 6. Where will we send your data?

As indicated above, we share Twitter ID numbers with Twitter. This sharing may involve a data transfer to a third country outside the EU without an appropriate level of data protection. As far as this is relevant – Twitter processes personal data in United States, Ireland and any other countries where it operates – Twitter has put appropriate protection measures in place, e.g. a Privacy Shield certification or European Commission-approved standard contractual clauses (see [Twitter's privacy policy](#)).

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## 7. Which company entity is my data controller?

The data controller for your data is SocialDatabase. Please find the relevant contact details below:

SocialDatabase  
Slego 1A  
1046 BM Amsterdam  
The Netherlands

## 8. How long will you retain my data?

We keep your personal data no longer than necessary to create a customized audience. As such, your personal data are deleted as soon as the customized audiences are available to our customers via Twitter.

The personal data in our database are a real-time copy of the public Twitter database and are continuously updated. As such, the retention terms Twitter applies are equally applicable here. For more information please revert to the [Twitter Privacy Policy](#).

## 9. How do you protect my data?

We strive to maintain the highest standards of security and we has put in place robust technical and organizational measures for the protection of your data in accordance with the current, general state of the art technologies, especially to protect the data against loss, falsification or access by unauthorized third persons.

The transmission of your personal data from and to Twitter takes place through so-called application programming interfaces, additionally the transfer of Twitter ID numbers from us to Twitter is secured by means of hashing (makes use of the cryptographic has function SHA-2).

Once we have received your personal data we will use strict procedures and security features to prevent unauthorized access, undesired modification and/or disappearance of your personal data.

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## 10. What rights do you have in relation to your data?

In principle you are entitled to a number of rights in relation to the personal data we process from you. **You can exercise these rights (most) easily and effectively via your [Twitter account](#).**

Via Twitter, you can ask a copy of your information, to correct it, erase or restrict its processing, or ask Twitter to transfer (some of) this information to other organizations. To exercise these rights please check your [Twitter account settings](#). Twitter also enables you with the right to object to certain processing activities, such as profiling performed by Twitter (or its third party business partners such as us) for the purposes of direct marketing. To exercise these rights please check your Twitter account [privacy and safety settings](#).

Any rights exercised by you through Twitter, are directly communicated with us through Twitter APIs. This means that whenever you change your "privacy and safety settings" or other Twitter account setting, such changes are automatically updated and implemented in our own secure database.

## 11. If you have questions

We hope this Privacy Notice satisfies any queries you have about the way we process your data. If you have any further concerns about how we process your data, you can get in touch with us at [office@socialdatabase.com](mailto:office@socialdatabase.com) or with our data protection officer at [dpo@socialdatabase.com](mailto:dpo@socialdatabase.com). Please note that in the event you have unresolved concerns, you also have the right to complain to a data protection authority. The relevant data protection authority will be the Dutch data protection authority, or *Autoriteit Persoonsgegevens* (<https://autoriteitpersoonsgegevens.nl/>).