

# Privacy Notice

Socialdatabase (version August 2023)

## 01. Who we are

This policy describes Socialdatabase's use of your data. Socialdatabase BV & Socialdatabase, Inc, collectively referred herein as Socialdatabase., we or us.

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

The privacy and protection of the personal data we collect about you are 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 X (FKA Twitter) in connection with our customized audiences advertising services and how we use the personal data we collect.

## 02. 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 X (FKA Twitter), using application programming interface (or "API") technology. Such personal data include:

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

As mentioned, we only collect personal data that is publicly available and accessible on X. i.e. if you have enabled "[Protect your Posts](#)" on X, 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.

## 02. 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. particular, we use your data for the



following purposes:

- a. we process your personal data to enrich our secure database with an up-to-date and real-time copy of the public X database;
- b. we process your personal data for marketing purposes, more in particular to (i) identify X 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 feed on X.
- 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).

#### 04. 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 X 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 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 X account from our customer (or other advertisers), X provides you the means to object to such processing via your “[privacy and safety settings](#)” in your account on X.

#### 05. 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 X, namely X ID numbers. We will only share this data with X in a secure manner. X is regarded as a separate controller, who provides its own separate service to our customer. X re-creates the customized audience on the X 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 X 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.

## 06. Where will we send your data?

As indicated above, we share X ID numbers with X. 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 – X processes personal data in the United States, Ireland and any other countries where it operates – X has put appropriate protection measures in place, e.g. a Privacy Shield certification or European Commission-approved standard contractual clauses (see [X's privacy policy](#)).

## 07. 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

## 08. 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 X. The personal data in our database are a real-time copy of the public X database and

are continuously updated. As such, the retention terms X applies are equally applicable here. For more information please revert to the [X's privacy policy](#).

## 09. How do you protect my data?

We strive to maintain the highest standards of security and we have 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 X takes place through so-called application programming interfaces, additionally, the transfer of X ID numbers from us to X is secured by means of hashing (makes use of the cryptographic hash 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.

## 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 X account](#).

Via X, you can ask for a copy of your information, to correct it, erase or restrict its processing, or ask X to transfer (some



of) this information to other organizations. To exercise these rights please check your [X account settings](#). X also enables you with the right to object to certain processing activities, such as profiling performed by X (or its third party business partners such as us) for the purposes of direct marketing. To exercise these rights please check your X account privacy and safety settings.

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

## 11. California Notice of Collection (CCPA)

### Special NOTICE concerning CALIFORNIA CONSUMER RIGHTS (CCPA)

Residents of California may have the following rights:

#### a. You have the right to know and access your personal information

You have the following rights to know under CCPA:

- The personal information categories we collect and the categories of sources from where go this information
- The third parties categories and any other entities where we share personal information with
- How to access the specific pieces of personal information that has been collected about you

If you need to contact us to get this information, please use the [following form](#) and include your name, email address, postal address and your X handle.

You can also email us at [privacy@socialdatabase.com](mailto:privacy@socialdatabase.com) with the subject heading “CCPA request”. You can also exercise your rights by sending a letter addressed to Socialdatabase, Inc., Attention: Privacy Policy Inquiry, 228 East 45th ST, Suite 9E, 10017, New York, NY. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by the California privacy rights requirements and only information on covered sharing will be included in our response. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this paragraph.

#### b. Right to deletion

In some cases, you may ask us to delete your personal information.

If so, please fill in the [form](#) available here and include your name, email address, postal address and X handle.

You can also email us at [privacy@socialdatabase.com](mailto:privacy@socialdatabase.com) with the subject heading “CCPA deletion request”.

You can also exercise your rights by sending a letter addressed to Socialdatabase, Inc., Attention: Privacy Policy Inquiry, 228 East 45th ST, Suite 9E, 10017, New York, NY. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is



covered by the California privacy rights requirements and only information on covered sharing will be included in our response. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this paragraph.

### c. Right to opt-out of sales

If we share your personal information with third parties in a manner that is seen as a sale under CCPA, you can request that we do not sell your personal information on a going-forward basis.

If so, please fill in the [form](#) available here and include your name, email address, postal address and X handle.

You can also email us at [privacy@socialdatabase.com](mailto:privacy@socialdatabase.com) with the subject heading “CCPA opt-out request”.

You can also exercise your rights by sending a letter addressed to Socialdatabase, Inc., Attention: Privacy Policy Inquiry, 228 East 45th ST, Suite 9E, 10017, New York, NY. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by the California privacy rights requirements and only information on covered sharing will be included in our response. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this paragraph.

### c. Right to non-discrimination

You may exercise any of the rights above, without fear of being discriminated against

just because you exercise your rights under the CCPA.

If you have any questions, you can email us at [privacy@socialdatabase.com](mailto:privacy@socialdatabase.com) with the subject heading “CCPA question”. You can also exercise your rights by sending a letter addressed to Socialdatabase, Inc., Attention: Privacy Policy Inquiry, 228 East 45th ST, Suite 9E, 10017, New York, NY. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by the California privacy rights requirements and only information on covered sharing will be included in our response. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this paragraph.

## 12. 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/>).