

# ESEMDEE PRIVACY POLICY

**Effective date:** 1<sup>st</sup> of March 2019

*We respect your right to privacy. This privacy policy (the "Privacy Policy") describes in detail how we collect, use and disclose your personal data, and what choices you have with respect to your personal data. Please read this Privacy Policy carefully. If, after reading the Privacy Policy, you still have any questions, please contact us so that we can address your concerns.*

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## **1. INTRODUCTION**

**1.1 Applicability of the Privacy Policy.** This Privacy Policy describes how and when we process individual users' ("you" and "your") personal data through the websites [esemdee.co.uk](http://esemdee.co.uk) and [esemdee.com](http://esemdee.com) (the "Websites"), the mobile application Esemdee (the "App"), and the services provided through and in relation to the Websites and the App (collectively, "Esemdee"). This Privacy Policy does not apply to any third-party applications or software that integrate with Esemdee or any other third-party products, services or businesses. Please note that you alone control and are responsible for any content you submit, create or post through Esemdee, as provided in the Terms of Use available on the Websites.

**1.2 About Esemdee.** Esemdee is a social media marketing tool that allows you to manage all your social media accounts from one place, schedule your posts quickly and easily, helps you to develop and analyze your social media strategy and build social media content.

**1.3 Responsible entity (data controller).** The entity that is responsible for the processing of personal data through Esemdee is the company S. M. Directions LTD, having a registered business address at 200 Brook Drive, Reading, Berkshire, RG2 6UB, the United Kingdom ("we", "us", and "our").

**1.4 Your consent to the Privacy Policy.** Your use of Esemdee is subject to this Privacy Policy. Before you start using Esemdee, please review this Privacy Policy. We also encourage you to review the Privacy Policy before submitting any personal data through Esemdee. In some cases (where required by the applicable law), we may seek to obtain your consent for the processing of your personal data. For example, we may seek your prior consent for the following purposes:

- If we are required by law to do so;
- If we intend to collect other types of personal data that are not mentioned in this Privacy Policy;
- If we intend to use your personal data for the purposes that are not

indicated in this Privacy Policy;

- If we would like to disclose or transfer your personal data to third parties that are not indicated in this Privacy Policy; or
- If we significantly amend this Privacy Policy.

**1.5 Minors.** We do not allow anyone younger than 18 years old to use Esemdee. Thus, we do not knowingly collect personal data of persons below the age of 18. If you learn that anyone younger than 18 has unlawfully provided us with personal data and you are a parent or legal guardian of that person, please contact us and we will take immediate steps to delete such personal data.

**1.6 Applicable laws.** We process your personal data in accordance with the applicable data protection laws, including the UK Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR). We collect your personal data when appropriate or required and by lawful means only.

**1.7 Term and termination.** This Privacy Policy enters into force on the effective date indicated at the top of the Privacy Policy and remains valid until terminated or updated by us.

## **2. TYPES OF PERSONAL DATA THAT WE COLLECT**

2.1 We require certain personal data to enable your use of Esemdee. For example, you must have an account in order to create or post content through Esemdee. We comply with data minimization principles and we collect only a minimal amount of personal data that is necessary for ensuring your use of Esemdee. The types of personal data collected by us and the circumstances in which we collect your personal data are described below:

- When you create a user account, we collect your (i) name, (ii) company name, (iii) address, (iv) email address, (v) phone number, and (vi) social media account details.
- When you contact us by email, we collect your (i) name, (ii) email address, and (iii) any information you decide to provide us.
- When you subscribe to our newsletter, we collect your email address.

- When you make a payment through Esemdee, we collect the payment details of your chosen payment method, such as your credit or debit card number, PayPal address, card expiration date, CVV code, and billing address.
- When you use Esemdee, we may collect your IP address and the location information provided by that IP address.
- When you connect your social media profile to Esemdee, we may collect and store the link to your avatar or profile photo and other details of your social media profile. We may also retrieve and store links to the photos stored on your social media profiles.

**2.2 Additional data.** We may receive certain additional data when if you upload any content on Esemdee, participate in a focus group, contest, activity or event, request support, register for a webinar, interact with our social media accounts or otherwise communicate with us. Please note that the provision of such data is optional and you may choose what personal data you would like to share with us.

**2.3 Sensitive Data.** We DO NOT collect, under any circumstances, any special categories of personal data (“sensitive data”) from you, such as your health information, opinion about your religious and political beliefs, racial origins, membership of a professional or trade association, or information about your sexual orientation.

**2.4 Failure to provide personal data.** If you fail to provide us with the personal data when requested, we may not be able to perform the requested operation and you may not be able to use the full functionality of Esemdee, receive the services provided through Esemdee, or get our response.

**2.5 Payment data.** You may provide us with payment information, including your credit or debit card number, PayPal address, card expiration date, CVV code, and billing address, in order to pay for your subscription or for the purchase of other offerings provided through Esemdee. The payment data is passed securely to our payment processor Stripe. After a transaction, your

personal data will not be stored on our servers. We may, however, store your invoices and receipts for a period of up to 6 years to facilitate our legal obligation to provide accounting information to the HMRC for tax purposes (please refer to Section 7.4 of the Privacy Policy for more information).

**2.6 Personal data obtained from third parties.** When using Esemdee, you can choose to permit or restrict services, functionalities, and integrations provided by third parties (e.g., social media providers Facebook, LinkedIn, Twitter and Instagram). Once enabled, the third-party providers may share certain information with us (e.g., you social media account information). For example, when you connect your Facebook account to Esemdee, you will be able to opt in to the data that we are able to collect from Facebook on your behalf. You are strongly encouraged to check carefully the privacy settings and notices of the third-party services to understand what information may be disclosed to us. We will inform you when we collect any data from those third parties. On all occasions where we receive data from a platform with whom Esemdee integrates, you will be informed of the data that will be collected by us and you will need to give consent for the processing of your personal data from these platforms by us on your behalf.

### **3. PURPOSES OF PERSONAL DATA**

3.1 We respect strictest data protection principles. Thus, we process your personal data only for specified and legitimate purposes explicitly mentioned in this Privacy Policy. In short, we will use personal data only for the purposes of enabling you to use of Esemdee, maintaining Esemdee, carrying our internal operations, conducting research about our business activities, administrative purposes, and replying to your enquiries. The detailed description of the purposes and legal basis for processing of your personal data is provided in the table below.

| Personal data | Purpose | Legal basis |
|---------------|---------|-------------|
|---------------|---------|-------------|

|   |  |  |
|---|--|--|
| <p>When you create an account:</p> <ul style="list-style-type: none"> <li>▪ Name</li> <li>▪ Company name</li> <li>▪ Mobile phone number</li> <li>▪ Email address</li> <li>▪ Address</li> </ul> <p>When you integrate your social media profiles</p> <ul style="list-style-type: none"> <li>▪ The information provided by your social media accounts, including your avatar and profile photo</li> </ul> | <ul style="list-style-type: none"> <li>▪ To create and maintain your account</li> <li>▪ To enable you to use the full functionality of Esemdee</li> <li>▪ To provide you with the requested services</li> <li>▪ To contact you, if necessary</li> <li>▪ To analyze, improve, and evaluate our business activities</li> </ul> | <ul style="list-style-type: none"> <li>▪ Performing a contract with you</li> <li>▪ Pursuing our legitimate business interests (to analyze and improve our business activities)</li> <li>▪ Your consent (for optional personal data)</li> </ul> |
| <p>When you contact us by email:</p> <ul style="list-style-type: none"> <li>▪ Name</li> <li>▪ Email address</li> <li>▪ Any information you decide to provide us in your message</li> </ul>  | <ul style="list-style-type: none"> <li>▪ To respond to your enquiries</li> <li>▪ To provide you with the requested information</li> </ul>  | <ul style="list-style-type: none"> <li>▪ Pursuing our legitimate business interests (to grow and promote our business)</li> <li>▪ Your consent (for optional personal data)</li> </ul>   |
| <p>When you sign up for a newsletter:</p> <ul style="list-style-type: none"> <li>▪ Email address</li> </ul>   | <p>To deliver you the newsletter</p>   | <p>Your consent</p>  |
| <p>When you use Esemdee</p> <ul style="list-style-type: none"> <li>▪ IP address</li> <li>▪ Approximate location information</li> </ul>  | <ul style="list-style-type: none"> <li>▪ To analyze, improve, and evaluate our business activities</li> <li>▪ To securely maintain your account</li> <li>▪ To measure or</li> </ul>  | <ul style="list-style-type: none"> <li>▪ Performing a contract with you</li> <li>▪ Pursuing our legitimate business interests (to analyze and improve our business activities)</li> </ul>  |

|  |  |   |
|--|--|---|
|  | <p>understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you</p> <ul style="list-style-type: none"> <li>• To make suggestions and recommendations to you and other users of Esemdee about features that may interest you or them</li> </ul> |   |
| <p>When you make a payment</p> <ul style="list-style-type: none"> <li>• Payment card details, including card number, CVV number, and expiration date</li> <li>• PayPal details</li> <li>• Billing address</li> </ul>   | <ul style="list-style-type: none"> <li>• To process your payment</li> </ul>  | <ul style="list-style-type: none"> <li>• Performing a contract with you</li> </ul>  |
| <p>When you register for a webinar, enter a competition, promotion or survey, or submit a ticket to our support team:</p> <ul style="list-style-type: none"> <li>• Your name</li> <li>• Email address</li> <li>• Any information you decide to provide us</li> </ul> | <ul style="list-style-type: none"> <li>• To provide you with the requested services</li> <li>• To contact you, if necessary</li> <li>• To allow you to participate in the requested events</li> </ul>  | <ul style="list-style-type: none"> <li>• Performing a contract with you</li> <li>• Your consent (for optional personal data)</li> </ul> |

#### **4. NON-PERSONAL (TECHNICAL) DATA**

4.1 When you use Esemdee, we may automatically collect certain non-personal data about your use of Esemdee. Such non-personal data does not allow us to identify you in any manner.

4.2 **Types of non-personal data.** We receive certain types of technical non-personal data when you view content on Esemdee or interact with Esemdee, even if you have not created an account. The non-personal data collected by us includes your:

- Browser type and version;
- Operating system;
- Device information (including device and application IDs);
- Time zone setting;
- Uniform Resource Locators (URL) clicks to, through and from Esemdee (including date and time) and the referring web pages;
- Approximate location of your device provided by your IP address;
- Browser plug-in types and versions, operating system and platform;
- Pages visited, search results, page response times, download errors, and length of visits to certain pages; and
- Page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

4.3 **Purposes of non-personal data.** We use the non-personal data to operate Esemdee and ensure that it is secure, reliable, and robust. For example, we use the your log data to protect the security of your account, improve the quality of Esemdee and to determine which features are being used most on Esemdee. Also, we will use non-personal data in furtherance of our legitimate interests in operating Esemdee, conducting and analyzing our business activities, and developing new products. More specifically, we collect the non-personal data for the following purposes:

- To analyze what kind of users visit and use Esemdee;



- To identify the channels through which Esemdee is accessed and used;
- To examine the relevance, popularity, and engagement rate of the content available on Esemdee;
- To investigate and help prevent security issues and abuse;
- To develop and provide search, learning, and productivity tools and additional features to Esemdee; and
- To personalize Esemdee for your specific needs.

**4.4 Your feedback.** If you contact us, we may keep records of any questions, complaints or compliments made by you and the response, if any. Where possible, we will de-identify your personal data. Please note that de-identified personal data is also considered to be non-personal data.

**4.5 Aggregated data.** In case your non-personal data is combined with certain elements of your personal data in a way that allows us to identify you, we will handle such aggregated data as personal data. If your personal data is aggregated or de-identified in a way that it can no longer be associated with an identified or identifiable natural person, it will not be considered personal data and we may use it for any business purpose.

## **5. SHARING AND DISCLOSING PERSONAL DATA**

5.1 We work closely with third parties that act as data processors (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and, if necessary, we may share your personal data with them.

5.2 The disclosure of your personal data is limited to the situations when such data is required for the following purposes:

- Ensuring the operation of Esemdee;
- Ensuring the delivery of the services requested by you;
- Providing you with the requested information;
- Pursuing our legitimate business interests;

- Enforcing our rights, preventing fraud, and security purposes;
- Carrying out our contractual obligations;
- Law enforcement purposes, enforcing our policies, or protecting our or others' rights, property, or safety; and
- If you provide your prior consent to such a disclosure.

**5.3 List of data processors.** We will share your personal data only with the third parties that agree to ensure an adequate level of protection of personal data that is consistent with this Privacy Policy and the applicable data protection laws. The third parties (data processors) that may have access to your personal data include, but are not limited, to:

- Our hosting provider [W5 Labs](#);
- Our business analytics and advertising service providers [Zoho](#), [Facebook Pixel](#), and [Google Analytics](#);
- Our Payment service provider [Stripe](#); and
- Our newsletter service providers [Zoho](#).

5.4 We do not sell or trade your personal data.

**5.5 Sharing you control.** We share or disclose your personal data with your consent or at your direction, such as when you authorize a social network or third party application to access your account or when you direct us to share your feedback with a business. When you share content via your Esemdee account to a third-party service, please keep in mind that you are controlling the flow of this content from Esemdee through to the third-party service. Subject to your settings, we also provide certain third parties with personal data to help us offer or operate Esemdee.

**5.6 Service providers.** We engage service providers to perform functions and provide services to us in the UK and other countries. For example, we use a variety of third-party services to help operate Esemdee, such as hosting Esemdee and helping us understand the use of Esemdee. We may share your personal data with such service providers, subject to obligations consistent with this

Privacy Policy and any other appropriate confidentiality and security measures, and on the condition that the third parties use your personal data only on our behalf and pursuant to our instructions.

**5.7 Advertisers.** We may share your personal data with advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We may make use of the personal data we have collected from you to enable us to display relevant advertisements to you on third party websites.

**5.8 Payment processor.** We share your payment data with our payment services provider Stripe to: (i) process payments; (ii) prevent, detect, and investigate fraud or other prohibited activities; (iii) facilitate dispute resolution such as chargebacks or refunds; and (iv) for other purposes associated with the acceptance of credit and debit cards.

**5.9 Affiliates and change of ownership.** In the event that we are involved in a bankruptcy, merger, acquisition, reorganization, or sale of assets, your personal data may be sold or transferred as part of that transaction. This Privacy Policy will apply to your personal data as transferred to the new entity. We may also disclose personal data about you to our affiliates in order to help operate Esemdee and our affiliates' services. This information is limited to your email address, browsing behavior and any other actions you've taken on Esemdee before becoming a customer.

**5.10 Legal requests.** If necessary, we will to disclose information about the users of Esemdee to the extent necessary for pursuing a public interest objective, such as national security or law enforcement.

**5.11 Sharing non-personal data.** We may disclose or use non-personal data and de-identified data for any purpose. For example, we may share it with prospects or partners for business or research purposes, for improving Esemdee, responding to lawful requests from public authorities or developing new products and services.

## **6. MARKETING COMMUNICATION**

**6.1 Marketing messages.** To keep you up-to-date with Esemdee, and, if (i) we have your consent or (ii) we would like to inform you about our services that are similar to the services already used by you, we may send you marketing messages, such as newsletters, brochures, promotions and advertisements, informing you about our new services or new features of Esemdee. If you would like to stop receiving such marketing messages, please click on the “unsubscribe” link provided in each of the message.

**6.2 Informational notices.** From time to time, we may send you informational notices, such as service-related, technical or administrative emails, information about Esemdee, your privacy and security, and other important matters. Please note that we will send such notices on an “if-needed” basis and they do not fall within the scope of direct marketing communication that requires your consent.

## **7. STORAGE OF PERSONAL DATA AND RETENTION PERIOD**

**7.1 Place of storage.** All information you provide to us is stored on our secure servers located in Hungary. Any payment transactions will be encrypted using TLS technology and processed via our payment gateway Stripe. We do not store any credit cards in our system.

**7.2 Retention period for personal data.** We will store your personal data in our systems only for as long as such personal data is required for the purposes described in this Privacy Policy, you request us to delete your personal data, or until you stop using Esemdee and deactivate your account - whichever comes first. After your personal data is no longer necessary for its purposes and there is no other legal basis for storing it (e.g., we are not obliged by law to store your personal data), we will immediately delete your personal data from our systems.

**7.3 Retention period for non-personal data.** We may retain non-personal data pertaining to you for as long as necessary for the purposes described in this Privacy Policy. This may include keeping non-personal data after you have deactivated your account for the period of time needed for us to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

**7.4 Retention as required by law.** Please note that, in some cases, we may be obliged by law to store your personal data for a certain period of time. In such cases, we will store your personal data for the time period stipulated by the applicable law and delete the personal data as soon as the required retention period expires.

## **8. TRANSFER OF PERSONAL DATA OUTSIDE THE EU**

8.1 Some of the third parties listed in Section 5 of this Privacy Policy are located outside the European Union (EU) and, if you reside in the EU, we may need to transfer your personal data to a destination outside the EU. For example, your personal data may be processed by employees or contractors operating outside the EU who work for us or for one of our suppliers. Such staff may be engaged in, among other things, processing your order, the processing of your payment details and the provision of support services.

8.2 In case it is necessary to make a transfer outside the EU, we will make sure that the jurisdiction in which the recipient third party is located guarantees an adequate level of protection for your personal data (e.g., the country in which the recipient is located is white-listed by the European Commission) or we conclude

an agreement with the respective third party that ensures such protection (e.g., a data processing agreement based on the Standard Contractual Clauses provided by the European Commission).

## **9. SECURITY**

**9.1 Our security measures.** Once we have received your personal data, we use strict procedures and security features to try to prevent unauthorized access, loss, misuse, and disclosure of your personal data. The security measures taken by us include secured networks, limited access to your personal data by our staff, and anonymization of personal data (when possible).

**9.2 Handling security breaches.** Although we put our best efforts to protect your personal data, the transmission of information on the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted through Esemdee and, to the extent permitted by the applicable law, we cannot be liable for any unlawful destruction, loss, use, copying, modification, leakage, and falsification of your personal data caused by circumstances that are beyond our reasonable control. In case a personal data breach occurs, we will inform our local data protection authority, namely, the UK Information Commissioner's Office (ICO) without undue delay and immediately take reasonable measures to mitigate the breach, as required by the applicable law.

**9.3 Your responsibility.** Where we have given you (or where you have chosen) a password which enables you to access certain parts of Esemdee, you are responsible for keeping this password confidential. We ask you not to share your password(s) with anyone. Also, in order to ensure the security of your personal data, we kindly ask you to use Esemdee through a secure network only.

## **10. YOUR RIGHTS**

**10.1 The rights you have.** Under the GDPR, individuals have certain rights in relation to their personal data. Subject to any exemptions provided by law, you may ask us to:

- Get a copy of your personal data that we store;
- Get a list of purposes for which your personal data is processed;
- Rectify inaccurate personal data;
- Move your personal data to another processor;
- Delete your personal data from our systems;
- Object and restrict processing of your personal data;
- Withdraw your consent; or
- Process your complaint regarding your personal data.

**10.2 Exercising your rights.** If you would like to exercise your rights listed above, please contact us by email at [support@esemdee.com](mailto:support@esemdee.com) and explain in detail your request. In order to verify the legitimacy of your request, we may ask you to provide us with an identifying piece of information, so that we would be able to identify you in our system. We will answer your request within a reasonable timeframe but no later than 2 weeks. Your requests can be submitted free of charge once per calendar year. If you submit your requests more than once per year, we reserve the right to charge a small administrative fee for providing the requested information. You may also exercise some of your rights as described below in this Section 10.

**10.3 Accessing or rectifying personal data.** If you have registered an account on Esemdee, we provide you with tools and account settings to access, correct, delete, or modify the personal data you provided to us and associated with your account. You can also download certain account information from Esemdee.

**10.4 Deletion of personal data.** We store your personal data until it is no longer necessary to provide our services or until your account is deleted - whichever comes first. Your account can be deactivated and deleted upon request. When deactivated, you will no longer be able to access your account on Esemdee. If you require immediate deletion of your account, please contact us at

[support@esemdee.com](mailto:support@esemdee.com) and allow up to 72 hours for us to action your request. When your account is deleted, we also delete all content you've created within your account, including all content created and you won't be able to recover that information later. We will also delete any personal data stored in any third party applications we use to service your account.

**10.5 Object, restrict, or withdraw consent.** You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your personal data to any third party for such purposes. You can exercise your right to prevent such processing by not-checking opt-in boxes on the forms we use to collect your data. You may also opt out of from Esemdee marketing communications sent to you by opening any email we have sent you and clicking on the "Unsubscribe" link.

**10.6 Launch a complaint.** If you would like to launch a complaint about the way in which we handle your personal data, we kindly ask you to contact us first and express your concerns. After you contact us, we will investigate your complaint and provide you with our response as soon as possible. If you are a resident of the EU and you are not satisfied with the outcome of your complaint, you have the right to lodge a complaint with your local data protection authority.

## **11. THIRD-PARTY LINKS AND WEBSITES**

Esemdee may, from time to time, contain links to and from third-party websites, the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to other websites.

## **12. COOKIES**

**12.1 Do we use cookies?** We use cookies on Esemdee. In this Section 12, you can



find information about the types of cookies that we use and the purposes for which the cookies are used. If you do not agree with our use of cookies, please disable your cookies as described in Section 12.6 “How to disable cookies?”. Please note that the full functionality of Esemdee may not be available without cookies.

**12.2 What is a cookie?** A cookie is a small piece of data, typically consisting of letters and numbers. When you visit a website, the website may send a cookie to your browser. Subsequently, the browser may store the cookie on your computer or mobile device. Cookies are designed to allow the recognition of user’s device and collection of certain information about the use of a website. Thus, over time, cookies allow websites to “remember” your actions and preferences. There are two types of cookies, namely, (i) persistent cookies, which remain valid until their expiration date, unless deleted by the user before that date and (ii) session cookies that are stored on a web browser and remain valid until the moment the browser is closed. Cookies may also be (i) first-party cookies (set by the website itself) and (ii) third-party cookies (placed by third-party websites).

**12.3 What cookies do we use?** The table below provides an overview of the cookies used by us, including their purposes and expiration time.

| <b>First-party cookies</b> |                            |                   |   |
|----------------------------|----------------------------|-------------------|---|
| <b>Cookie</b>              | <b>Type</b>                | <b>Expiration</b> | <b>Purpose</b>  |
| <b>PHPSESSID</b>           | First-party session cookie | End of session    | The PHPSESSID cookie is native to PHP and enables websites to store serialized state data. It is used to establish a user session and to pass state data via a temporary cookie, which is commonly referred to as a session cookie. |
| <b>_ga</b>                 | First-party Google         | 2 years           | Registers a unique ID that is used to generate statistical data on how the visitor uses the website. It enables us to   |

|                                 |   |        |   |
|---------------------------------|---|--------|---|
|                                 | Analytics<br>HTTP cookie                          |        | get information about your use of Esemdee, such as the time of visit, the pages viewed, and whether you have visited certain websites before visiting Esemdee. For further information about Google Analytics please see:<br><a href="https://www.google.com/policies/technologies/types/">https://www.google.com/policies/technologies/types/</a>  |
| <b>_gat_gtag_UA_135021856_1</b> | First-party<br>Google HTTP<br>cookie              | 1 day  | Used by Google Analytics to throttle request rate. It enables us to get information about your use of Esemdee, such as the time of visit, the pages viewed, and whether you have visited certain websites before visiting Esemdee. For further information about Google Analytics please see:<br><a href="https://www.google.com/policies/technologies/types/">https://www.google.com/policies/technologies/types/</a>  |
| <b>_gid</b>                     | First-party<br>Google<br>Analytics<br>hTTP Cookie | 1 day  | Used by Google Analytics to register a unique ID that is used to generate statistical data on how you use Esemdee. It enables us to get information about your use of Esemdee, such as the time of visit, the pages viewed, and whether you have visited certain websites before visiting Esemdee.<br><br>For further information about Google Analytics please see:<br><a href="https://www.google.com/policies/technologies/types/">https://www.google.com/policies/technologies/types/</a> |
| <b>cookie_notice_accepted</b>   | HTTP Cookies                                      | 1 year | Stores the user's cookie consent state for the current domain   |
| <b>Third-party cookies</b>      |   |        |   |

| Cookie             | Type  | Expiration     | Purpose   |
|--------------------|---|----------------|---|
| <b>_fbp</b>        | Third-party<br>Facebook<br>marketing<br>HTTP cookie | 3 months       | Used by Facebook to deliver a series of advertisement products such as real-time bidding from third party advertisers. It enables us to measure, optimize and build audiences for advertising campaigns served on Facebook. For further information about the Facebook Pixel please see:<br><a href="https://en-gb.facebook.com/business/help/651294705016616">https://en-gb.facebook.com/business/help/651294705016616</a> |
| <b>fr</b>          | Third-party<br>Facebook<br>marketing<br>HTTP cookie | 3 months       | Used by Facebook to deliver a series of advertisement products such as real-time bidding from third party advertisers. It enables us to measure, optimize and build audiences for advertising campaigns served on Facebook. For further information about the Facebook Pixel please see:<br><a href="https://en-gb.facebook.com/business/help/651294705016616">https://en-gb.facebook.com/business/help/651294705016616</a> |
| <b>__cfduid</b>    | Third-party<br>HTTP cookie                          | 1 year         | Used by the content network Cloudflare to identify trusted web traffic.   |
| <b>gstatic.com</b> | Third-party<br>session<br>cookie                    | End of session | Used for loading web fonts from Google Cloud Content Delivery Network.  |

12.4 **For what purposes do we use cookies?** We use cookies for the following purposes:

- To identify you as a unique user when you are browsing Esemdee;
- To verify your details while you are navigating through Esemdee;
- To customize and personalize Esemdee for you;
- To remember your custom preferences;

- To conduct analytics of our business activities; and
- To generate information and reports about your use of Esemdee.

12.5 **Cookie consent.** When you visit Esemdee for the first time, we may ask you to provide us with your consent to our use of cookies.

12.6 **How to disable cookies?** If you would like to refuse our use of cookies on Esemdee, you can do it at any time by declining cookies in your browser or device (please check your browser's or device's "help" or "settings" functionalities for more information) or visiting <https://www.aboutcookies.org> for further information. Please be aware that some parts of Esemdee may not function properly without cookies.

12.7 **Google Analytics.** We use Google Analytics, the service provided by Google, Inc. ("Google") to analyze your use of Esemdee. Google Analytics generates statistical and other information by means of cookies and we use its services to create reports about your use of Esemdee. Google Analytics cookies are anonymous first-party cookies. Such cookies include cookies entitled "\_\_gat", "\_\_gid", and "\_\_ga". The use of Google Analytics cookies is anonymous and does not allow us to identify you in any manner. The information generated by cookies about your use of Esemdee (including your IP address) will be transmitted to and stored by Google on servers in the United States. Please note that your IP address will be anonymized and Google will not combine your IP address with other information Google holds about you. Thus, Google will not be able to identify you. In certain cases (e.g., when required by law or when third parties conduct services on behalf of Google), Google may transfer the information to third parties. For more information about Google Analytics' privacy practices, please visit <https://support.google.com/analytics/answer/6004245>.

12.8 **Opting-out from Google Analytics.** If you would like to opt out from Google Analytics, you can do so by installing a Google Analytics opt-out browser add-on available at <https://tools.google.com/dlpage/gaoptout?hl=en>. For more information on opting-out from advertising features on your device, please visit <https://www.networkadvertising.org>.

### **13. CHANGES TO THE PRIVACY POLICY**

13.1 We may revise this Privacy Policy from time to time. The most current version of the Privacy Policy will govern our processing of your personal data and will always be available on Esemdee.

13.2 If we make a change to this Privacy Policy that, in our sole discretion, is material, we will notify you via email to the email address associated with your account, and, if necessary, seek your consent to the amendments. By continuing to access or use Esemdee after those changes become effective or you provide your consent, you agree to be bound by the revised Privacy Policy.

### **14. CONTACT US**

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to [support@esemdee.com](mailto:support@esemdee.com). You can also contact us by mail at:

Esemdee

c/o: S.M. Directions

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