

Introduction

Internet Billboard a.s. is the author of the product you're using.

We, as Internet Billboard, cannot avoid working with and/or processing **personal data** – i.e. data which can be directly or indirectly linked to a physical person, such as you or a client of your company. We treat this data according to the EU's **GDPR directive**.

That means that we only store what we absolutely, necessarily have to store **for the various purposes** we list on these pages. We only store these data for the time they are really needed and we do our best to protect these data in such a way that, even if they leaked, they would be of no use to anyone and so would have no negative consequences for you.

For example, where possible, data are encrypted so that unauthorized persons cannot read them. Only those employees whose access to the data is needed for the performance of their jobs have access, and all those employees are trained in how to work with personal data.

These pages provide all the information about the data we process and for what purposes. You will also find here information about **what you can do if you have any complaints** about the processing of your personal data.

Internet Billboard respects your choice and your privacy.

Please continue reading about

- What are personal data, which data we consider personal in our case
- For what purposes we collect personal data
- What are your rights with respect to our processing of your data
- Glossary of terms

You can also read which **personal data we process** in general, outside of this specific product.

Which data we consider to be personal

According to law, personal data are any data which are or can be linked to an identifiable, physical person.

Although we usually do not work with names, surnames, social security numbers and similar data which could directly identify a physical person, we do work with other data which, indirectly, could help identifying him/her. This is a list of such data:

Log-in data of our clients, their employees or business partners

Similarly to when you log in to your e-mail client or favorite social network using user name and password, our clients and their employees or business partners also have to log in to our programs and applications.

Each of the logged-in users of our programs is assigned with a unique identifier, looking, for example, like this: „5ec0d541-f642-4d3c-9052-3166a4edd498“.

We treat all data containing such an identifier or user name of the logged-in user as personal.

IP addresses

Whenever you try to visit a webpage in your browser, your computer begins to exchange data with the computer which serves the web page.

We (humans) need addresses and zip codes to precisely deliver our letters and parcels. Computers need some addresses as well. Each of them is assigned a unique address, known as an IP address, which other computers can use to send data to it. It is like a computer-specific ZIP code.

IP addresses may look like this: 192.168.45.12

As you can see, it is not a real address of your flat or house, but merely a number which computers can easily process. Without IP addresses, the internet as we know it would not work.

Although we at Internet Billboard cannot figure out much from the IP address of your computer, European courts previously decided that it is necessary to consider IP addresses as personal data. This is because, if linked to the data recorded by internet providers (by law), the authorities, such as police or court, could derive your address or identity from it.

It is important to understand that almost all internet pages are in fact built from many smaller pieces, similarly to a jig-saw puzzle. Each of these pieces may be processed and delivered by a different computer (server). Thus, when visiting a single web page, your IP addresses necessarily revealed to many different computers, potentially in many different parts of the world.

In the case of our clients (publishers), the web page can consist of its main content, such as an article or video, and of advertising slots. If you enter such a page, your IP address will be revealed to computers of our client as well as to ours.

Unless necessary, we do not store full IP addresses. For example, we drop the last number from it. This effectively disables anyone from linking it to your computer. It is similar to dropping the last digit from a ZIP code. We would still deliver to the right city, but not a specific street or home.

However, this measure is not always possible. Sometimes, such as to find an attacker, we need a full IP address.

In cases where we process a complete IP address we treat it and all the data linked to it as personal data. We store the full IP address for 3 months.

There is no way for you to avoid transmitting your IP address, as it is required for the internet to work as it does. If you wished, you could hide your true IP address behind some other one using a dedicated service, yet even then the service itself will still see your true IP address.

E-mail addresses

E-mail addresses often contain the name or surname of the owner. When combined with job position or other data, it can theoretically lead to the identification of a specific individual. That is why we treat e-mail addresses as personal data.

If you want to protect your privacy we encourage you to use e-mail addresses which do not allow such identification.

Why do we collect personal data

In the context of this product we collect personal data for *various reasons* - you can read about these below.

Log-in to the application

If you want to use our product we need to have a way of knowing that you have the right to do so, which is why you have to use a username+password combination to log in. Usernames often contain e-mail addresses, therefore we actually consider login credentials to be personal data.

The necessity to process this data is covered in the *contract* with our clients.

The login information for the systems are available for the duration of the contract.

Providing customer care

Our products enable you to fill in your contact details, such as email, phone number, name and surname, job position, etc.

This is of course not mandatory; however, by doing so you make it easier for our customer care to help you with your inquiries in a timely manner.

By filling these contact details you are giving us your *consent to process this data*. You can revoke this consent at any time by simply deleting the contact details in question.

The contact details are stored for the duration of contract.

Contact details for your own needs

In our products, it is possible to fill in contact details of your clients, cooperating agencies, etc. These details are not mandatory and serve for your convenience. Please make sure that you and your company have a legal reason for processing such data. You or your company are actually responsible for this data (*controller*).

In this particular case, Internet Billboard is considered to be a processor, but we of course protect the data for you in the same way as the rest of the personal data.

This data is stored for a maximum of 1 year from the expiration of the contract.

Audit logs and customer care

When you work with our products, we store which user (but actually only his/her user ID) made a certain change of settings and when they did so. We use this data for two purposes:

- To provide customer care as specified in our contract (for example: "Why is our campaign not running?" - "Because you stopped it yesterday at 16:39.")
- As an audit log which can prove e.g. who started or stopped a certain campaign, what changes of settings have been done, etc. in case of a dispute

Since audit logs are by their nature immutable (they cannot be changed - otherwise they could not be used for an audit), we store this data throughout the whole existence of a product.

In case of termination of the contract, the data are anonymized - ie. the user identifier can no longer be associated with a specific natural person.

Security

Our computers (servers) store which IP addresses access which part of the product, how often and when. This data serves to identify a potential breach in security and therefore it is used to protect other data, which we consider to be our duty and *legitimate interest*.

We store this data for a duration of 1 month.

Your rights in relation to the processing of personal data

Because we are *processing most of the personal data on behalf of our clients*, you should, from a legal perspective, primarily contact them in the event you have any objections or comments.

If you are unsure or have any doubts, feel free to contact us. In cases where your inquiry pertains to someone else, we will try to help you to reach the right party.

In any case where we are processing your personal data *for our own purposes*, don't hesitate to contact us should you have any comments, requirements, etc.

In general, you have the following rights as the "data subject", i.e. the person whose data are being processed:

- a) If there is a legal requirement for your *consent* to the processing of your data, you have the **right to revoke your consent at any time**.
- b) If internet Billboard is a "*controller*" of your data – i.e. if we process it for our own purposes – you have the right **to have access to your personal data** and to **demand their correction**.
- c) You also have further rights like – right to erasure of your data, right to restrict the processing, right to object to processing for marketing reasons, right to transfer your data.
- d) You have the right to disagree with the processing of your personal data.
- e) You have the right to object at the appropriate state authority responsible for data protection (*UOOU*).

Please note that most of these rights are subject to various conditions, some of which were mentioned above.

We have tried to explain here why we need to process your personal data. If there is a legal requirement for your explicit *consent*, you are **NOT obliged** to give it to us. If you decide to give us your consent, you are always entitled to revoke it, at any time.

Please note that there are legal reasons for processing your personal data, which do not require your consent. For example, we might have a *legitimate interest* in processing some personal data for data security reasons. In these cases, we are still obliged to inform you about the *purposes of this processing*. This is what these pages are about.

If you revoke your consent, we will cease processing your personal data for purposes that require that revoked consent.

If you wish to revoke your consent to the processing of your personal data, you can do that by:

- a) e-mailing us to gdpr@ibillboard.com
- or
- b) by delivering in writing to our address at: Internet Billboard a.s., Beethovenova 2, Opava, 74601, Czech Republic

In case of any **question or inquiry** related to personal data protection, **consent revocation**, or in case of any **complaints**, please contact us also using the contact described above.

Please note that we have to make sure that we are actually discussing your personal data – that they belong to you. It is not necessarily easy, because we do not have any direct tools to connect our data to a particular, physical person. We do not know whether a particular *unique reader identifier* belongs to Jan Novak or John Doe.

That is why the easiest way might be just to *make us forget everything about you*. By doing so, you can force us to forget everything about you, because you will remove the only existing link between you and the data.

Glossary of Terms

Please note that these are not the exact legal definitions. We are rather trying to explain them in plain, understandable language. You can read the *full text of GDPR*, or its *explanation*, here.

Legitimate interest

The GDPR directive provides multiple legal grounds for the processing of personal data. One of them is legitimate interest. It basically means that we have a very good reason for processing your data, while doing so does not unduly harm your rights or interests.

Explicit informed consent

For some processing purposes, the GDPR directive demands an explicit, informed consent of the data subject, i.e. you. It is mostly in cases where you might not expect such processing, or where processing your data might have unwanted, adverse consequences for you, your rights and your life.

Controller

A Controller of personal data is someone who decides which personal data needs to be processed (if any) and for which purposes. The Controller can hire a third-party for the processing of such data, which then can process it in their name. This third party is called *Processor*

Processor

A Processor of personal data is someone who, in the name of the controller, processes personal data. The Processor therefore only fulfils the will of the controller, and has no interest in processing this personal data for himself.