

# **Privacy Statement Send Challenges**

SendChallenges provides a platform for users to participate in various (online) challenges. When providing our services, we process personal data. We consider it important to treat personal data with care. In this Privacy Statement you can read how we handle the personal data we collect.

### Who is Send Challenges?

SendChallenges B.V. ("**Send Challenges**", "we", "us" or "our") is the controller of the processing of your personal data and is located at (5431 NV) Cuijk at the De Nieuwe Erven 3, Unit 11191 and registered in the Commercial Register of the Chamber of Commerce under number 90269810.

For any questions regarding the processing of personal data, please contact info@sendchallenges.com

#### When does this Privacy Statement apply?

This Privacy Statement applies to you as:

- You visit our website www.sendchallenges.com (the "Website");
- You contact us;
- You use our services.

#### **Joint Controllers**

In certain cases, there may be joint controllership between SendChallenges and you as a user, particularly when you create and share content on our platform. In such situations, SendChallenges is primarily responsible for the technical infrastructure and security of the platform, while you as a user are responsible for the content you post and any personal data of third parties that you may process in doing so.

SendChallenges ensures that data subjects can exercise their rights via the platform and serves as the primary point of contact for data subjects. However, data subjects may also exercise their rights directly with you as a user, if you have processed their personal data. In such cases, you must promptly inform SendChallenges via <a href="mailto:info@sendchallenges.com">info@sendchallenges.com</a> about such requests.

#### What does SendChallenges use your personal data for?

SendChallenges uses your personal data for various purposes. By law, we may only use this data if there is a valid basis for doing so. This could, for example, be your consent but it could also be that we need your data to conclude or perform the agreement or that SendChallenges has a legitimate business interest or a legal obligation in the processing.



Below is an overview of the personal data that SendChallenges collects and for what purpose, on what basis and for how long we keep it.

Processing activity	Which data	Purpose + Basis	Retention period
Visiting the Website	SendChallenges collects technical data about your visit. This includes IP address, MAC address, the browser used, parts you visit on the Website and other log information.	This data is necessary for the Website to function properly and display information in the desired way.  SendChallenges therefore processes this data to pursue its legitimate business interest of showing you a working website.	The retention period differs for each cookie.  In our cookie statement you can read how long the different statistics cookies are stored
Account creation	To use Send Challenges' services, you will need to create an account. SendChallenges collects your personal data. This includes your name, gender, age, e-mail address and other (necessary) contact information.	To offer the services to you, this data is necessary for Send Challenges. The data is needed to conclude the agreement with you and to execute it effectively and properly.	SendChallenges deletes personal data no later than 6 months after a request to delete the account.
Contact	You can contact us via e-mail (info@sendchallenges.com) or by phone at the number indicated on the Website.  We process your e-mail address and possibly your telephone number.  What other data SendChallenges processes	SendChallenges needs this personal data from you to provide you with a good and complete service. SendChallenges therefore has a legitimate business interest in processing to answer questions, handle complaints and help you.	We will not keep your data longer than necessary to answer your query



	depends on your provision of information to us.		
User Content	When users create content, SendChallenges collects the following data: the content of the posted material (text, photos, videos), metadata (date and time of posting, location data if shared), interaction data (likes, comments, sharing actions) and device information on which the content was created (device type, operating system).	The processing is based on the performance of the contract with you and the legitimate interest of SendChallenges to optimize and maintain the security of its platform.	The user content is retained for as long as your account is active and up to a maximum of 2 years after termination of your account.

## Who has access to your data?

SendChallenges will handle your data with utmost care. If necessary for the performance of our services, we may grant parties access to your data. Below you will find an overview of which parties these are.

## 1. Employees of Send Challenges.

- Our employees have access to your data, if and to the extent necessary for their jobs.

### 2. Processors

For our services, we may use parties who process data on our behalf, e.g. to host the
website and store and manage personal data. With these parties, we conclude a processing
agreement in all cases.

#### 3. Government institutions and authorities

 SendChallenges may be required by laws and regulations to share personal data about you with government agencies or authorities.

# International transfer

Where SendChallenges processes or transmits your data outside the European Economic Area (EEA), it will do so in compliance with the relevant legislation. In such situations, SendChallenges will ensure appropriate safeguards that provide an adequate level of protection for your rights and freedoms as a data subject in accordance with the AVG. Where necessary, we set out arrangements in a data transfer agreement based on <u>model contractual clauses</u> approved by the European Commission. For additional



information on international transfers of your personal data and the safeguards we have put in place, please contact <u>info@sendchallenges.com</u>.

#### Rights of data subject

If SendChallenges processes personal data about you, you have the following rights.

- 1. Right of access. You have the right to obtain from SendChallenges access to your personal data and additional information about the processing thereof, for example to which (categories of) recipients your personal data have been or will be shared.
- 2. Right to be forgotten. In a number of cases, you have the right to ask SendChallenges to delete your personal data. We will delete your personal data, for example if your data is no longer needed, if you object to the use of your data or if a legally defined retention period has expired.
- **3. Right to rectification**. Furthermore, you can ask us to rectify personal data about you, which means that we will correct inaccurate or incomplete personal data about you.
- 4. Right to object. If SendChallenges bases the use of your personal data on its legitimate interests, you have the right to object to the processing of your personal data because of your specific situation (your particular personal circumstances). We will stop processing this data unless we argue that there are compelling legitimate grounds for processing that outweigh your interests. As long as it is not yet clear whether our grounds outweigh your interests, we will not process the data in question.
- **S. Right to restriction of processing**. You have the right to restrict the use of your personal data in certain situations. This means that SendChallenges temporarily pauses the processing of your personal data, e.g. if your personal data may be inaccurate, we will restrict its use as long as we have not checked whether the data is correct.
- **Right to portability**. If the processing is based on your consent or the performance of a contract, we must in most cases at your request send you all personal data in a structured, common and machine-readable form. This way, you can transfer your data to another party.
- 7. Withdrawal of consent. Where we process personal data about you on the basis of your consent, you have the right to withdraw that consent at any time. This will not affect the personal data that SendChallenges processed before you withdrew your consent.



# Complaints on use of personal data

If you have any questions about the Privacy Statement of SendChallenges or have a complaint about the processing of personal data, please contact us at <a href="mailto:info@sendchallenges.com">info@sendchallenges.com</a>. You can also lodge a complaint with <a href="mailto:Dutch DPA">Dutch DPA (Autoriteit Persoonsgegevens)</a>.

## Changes

In case changes to our Privacy Statement become necessary, you will always find the most recent information on this page. If we change our Privacy Statement in such a way that the change has major implications for your privacy, we will endeavour to inform you accordingly.

Last update: 31 March 2025



# **Cookie Statement SendChallenges**

This Cookie Statement of SendChallenges informs you how cookies are placed on and information is read from your computer, tablet and/or mobile phone via the website. This Cookie Statement also indicates the purposes for which this collected information is used.

#### What are cookies?

Cookies or similar techniques are small (text) files that your computer, tablet, smartphone or other electronic device stores when you use the Website. They allow information to be collected or stored about a website visit or about (the device of) the person visiting our website. This allows us to measure how our website is used and allows us to continuously improve the website. Cookies and similar techniques are safe: they cannot start programmes or spread viruses. Cookies and similar techniques have a runtime. Some are deleted when you close your browser. There are also cookies and similar techniques that remain valid for longer, so that they can be read the next time you visit the website. At the end of this cookie statement, you will find an overview of all cookies and their duration.

#### What cookies does SendChallenges use?

SendChallenges uses **technical and functional** cookies. These cookies are necessary to deliver the website in a user-friendly way and make it work properly. For example, functional cookies remember settings you have entered, such as cookie preferences. In addition, SendChallenges uses **third-party cookies** such as **analytical cookies** (**Google Analytics**) and **tracking cookies**. For analytical cookies, SendChallenges has a legitimate interest, namely to optimise its website and services. For tracking and/or advertisement cookies, we ask your permission when you visit our website.

#### Overview of cookies

SendChallenges uses the cookies listed below.

Read our full cookie and privacy policy <a href="https://sendchallenges.com/cookies">https://sendchallenges.com/cookies</a>.



#### **Google Analytics**

To collect statistics on the use and visits to the website, SendChallenges uses Google Analytics. Google Analytics places a cookie on your device and on the basis of which the use of the website is then recorded. This data is analysed by Google. The results are provided to SendChallenges In this way, SendChallenges gains insight into the traffic to and from the website and the way the website is used. On the basis of the results, SendChallenges can improve and adjust its services and/or its website.

Google processes your IP address (this is immediately anonymised), the type of browser, the computer system you use, the account number and the pages you visit on the website in accordance with model contractual clauses established by the European Commission (Article 46(2)(c) AVG). For more information on this data processing, please read Google's privacy statement.

The use of Google Analytics has been set up by SendChallenges to be as privacy-friendly as possible. For this purpose, SendChallenges has taken the following measures to ensure your privacy:

- SendChallenges has concluded a processing agreement with Google in which agreements are laid
  down on the handling of the data collected. In this, SendChallenges has not allowed Google to
  use the information obtained for other Google services.
- SendChallenges has had the last octet of your website visitors' IP address deleted. This has largely mitigated the risk of processing.
- SendChallenges has disabled the settings in Google Analytics to share data with Google so that Google cannot use the data for its own (advertising) purposes.
- SendChallenges has disabled settings in Google Analytics to collect detailed location data and device data.
- SendChallenges has set up device-based identification for visitors to the website, which does not use User ID.

For more information (in English) about Google Analytics cookies, <u>click here</u>. Google offers you the option to opt out of data collection under Google Analytics, using the Google Analytics Opt-out Browser Add-on. Click <u>here</u> to make use of that option. Click <u>here</u> for more general information on how Google uses cookies.

**Send Challenges** 

## How can you disable or delete cookies?

You can manage cookies through your browser settings. You can set your browser so that no cookies are stored, you can allow or deny each cookie or all cookies are deleted when you close your browser. To find out how to enable, disable or delete cookies, you can also use your browser's Help function or consult the following pages:

- Chrome
- <u>Firefox</u>
- <u>Explorer</u>
- <u>Safari</u>
- Edge

If you want to disable cookies from other parties, you can do so for several parties at once at www.youronlinechoices.eu.

Please note that rejecting or deleting cookies only affects the device and browser on which you perform this action. If you use different devices and/or browsers, you must repeat the actions described above on these devices and/or browsers.

# Questions about cookies?

If you have any questions or would like more information about cookies, please feel free to contact us at <a href="mailto:info@sendchallenges.com">info@sendchallenges.com</a>.

Last update: 24 juni 2025