

# Data Policy

This policy describes the information we process to support Dubme and its applications. You can find additional tools and information in the Profile screen in the Glossom app or by contacting us on [hello@glossom.tv](mailto:hello@glossom.tv)

## I. What kinds of information do we collect?

To provide the Dubme Products, we must process information about you. The types of information we collect depend on how you use our Products. You can access and delete information we collect by visiting the Glossom app profile page or by contacting us at [hello@glossom.tv](mailto:hello@glossom.tv)

### **Things you and others do and provide**

- Information and content you provide. We collect the content, communications and other information you provide when you use our Products, including when you sign up for an account, create or share content, and message or communicate with others. This can include information in or about the content you provide (like metadata), such as the location of a photo or the date a file was created. It can also include what you see through features we provide, such as our camera, so we can do things like suggest masks and filters that you might like, or give you tips on using portrait mode. Our systems automatically process content and communications you and others provide to analyze context and what's in them for the purposes described below.
- Networks and connections. We collect information about the people, Pages, accounts, hashtags and groups you are connected to and how you interact with them across our Products, such as people you communicate with the most or

groups you are part of. We also collect contact information if you choose to upload, sync or import it from a device (such as an address book or call log or SMS log history), which we use for things like helping you and others find people you may know and for the other purposes listed below.

- Your usage. We collect information about how you use our Products, such as the types of content you view or engage with; the features you use; the actions you take; the people or accounts you interact with; and the time, frequency and duration of your activities. For example, we log when you're using and have last used our Products, and what posts, videos and other content you view on our Products. We also collect information about how you use features like our camera.
- Information about transactions made on our Products. If you use our Products for purchases or other financial transactions (such as when you make a purchase a beauty product or make a donation), we collect information about the purchase or transaction. This includes payment information, such as your credit or debit card number and other card information; other account and authentication information; and billing, shipping and contact details.
- Things others do and information they provide about you. We also receive and analyze content, communications and information that other people provide when they use our Products. This can include information about you, such as when others share or comment on a photo of you, send a message to you, or upload, sync or import your contact information.
- Makeup bag and the wishlist products are connected to the user accounts and stored, in order to display either private or publicly.
- All in all, the user information we collect (when provided) are: birthday, email, interest in other profiles(following), products(wishlist, makeup bag), and videos(likes, comments), gender, all the information about the content you post, biography, display name, username, creation date, phone number, instagram username and follower count.

## **Device Information**

As described below, we collect information from and about the computers, phones, connected TVs and other web-connected devices you use that integrate with our Products, and we combine this information across different devices you use. For example, we use information collected about your use of our Products on your phone to better personalize the content (including ads) or features you see when you use our Products on another device, such as your laptop or tablet, or to measure whether you took an action in response to an ad we showed you on your phone on a different device.

## **Information we obtain from these devices includes:**

- Device attributes: information such as the operating system, hardware and software versions, battery level, signal strength, available storage space, browser type, app and file names and types, and plugins.
- Device operations: information about operations and behaviors performed on the device, such as whether a window is foregrounded or backgrounded, or mouse movements (which can help distinguish humans from bots).
- Identifiers: unique identifiers, device IDs, and other identifiers, such as from games, apps or accounts you use, and Family Device IDs.
- Device signals: Bluetooth signals, and information about nearby Wi-Fi access points, beacons, and cell towers.
- Data from device settings: information you allow us to receive through device settings you turn on, such as access to your GPS location, camera or photos.
- Network and connections: information such as the name of your mobile operator or ISP, language, time zone, mobile phone number, IP address, connection speed and, in some cases, information about other devices that are nearby or on your network, so we can do things like help you stream a video from your phone to your TV.
- Cookie data: data from cookies stored on your device, including cookie IDs and settings. Learn more about how we use cookies in the Cookies Policy.

## **Information from partners**

Advertisers, app developers, and publishers can send us information through Glossom tools and widgets they use, including our social plug-ins (such as the Like button), Login, our APIs and SDKs. These partners provide information about your activities off Glossom—including information about your device, websites you visit, purchases you make, the ads you see, and how you use their services—whether or not you have a Glossom account or are logged into Glossom. For example, a blogger could use our API to tell us what products you viewed, or a business could tell us about a purchase you made in its store. We also receive information about your online and offline actions and purchases from third-party data providers who have the rights to provide us with your information.

Partners receive your data when you visit or use their services or through third parties they work with. We require each of these partners to have lawful rights to collect, use and share your data before providing any data to us. We will provide information about the types of partners we receive data from, once we have partnerships.

All these data are stored on Amazon Web Services, and Google Cloud Platform in Germany, Ireland and USA.

Please, find more information and their policies of these platforms below:

[https://aws.amazon.com/privacy/?nc1=f\\_pr](https://aws.amazon.com/privacy/?nc1=f_pr)

<https://cloud.google.com/security/gdpr/>

<https://policies.google.com/privacy>

And some information is collected for tracking and crash reporting purposes using Fabric services such as Crashlytics and Answers, as well as Google Services such as Google Analytics and Firebase Analytics.

<https://fabric.io/terms>

### **Google analytics:**

Google Analytics uses so-called “cookies”. These are text files that are stored on your computer and that allow an analysis of the use of the website by you. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there.

Google Analytics cookies are stored based on Art. 6 (1) (f) GDPR – DSGVO. The website operator has a legitimate interest in analyzing user behavior to optimize both its website and its advertising.

### **IP anonymization**

We have activated the IP anonymization feature on this website. Your IP address will be shortened by Google within the European Union or other parties to the Agreement on the European Economic Area prior to transmission to the United States. Only in exceptional cases is the full IP address sent to a Google server in the US and shortened there.

Google will use this information on behalf of the operator of this website to evaluate your use of the website, to compile reports on website activity, and to provide other services regarding website activity and Internet usage for the website operator. The IP address transmitted by your browser as part of Google Analytics will not be merged with any other data held by Google.

### **Browser plugin**

You can prevent these cookies being stored by selecting the appropriate settings in your browser. However, we wish to point out that doing so may mean you will not be able to enjoy the full functionality of this website. You can also prevent the data generated by cookies about your use of the website (incl. your IP address) from being passed to Google, and the processing of these data by Google, by downloading and installing the browser plugin available at the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en>

### **Objecting to the collection of data**

You can prevent the collection of your data by Google Analytics by writing us on [support@glossom.tv](mailto:support@glossom.tv)

For more information about how Google Analytics handles user data, see Google's privacy policy: <https://support.google.com/analytics/answer/6004245?hl=en>.

### **MailChimp & Mailjet:**

Glossom uses the services of MailChimp & Mailjet to send newsletters. MailChimp & Mailjet are referred as only Mailchimp below.

MailChimp is a service which organizes and analyzes the distribution of newsletters. If you provide data (e.g. your email address) to subscribe to our newsletter, it will be stored on MailChimp servers in the USA.

MailChimp is certified under the EU-US Privacy Shield. The Privacy Shield is an agreement between the European Union (EU) and the US to ensure compliance with European privacy standards in the United States.

We use MailChimp to analyze our newsletter campaigns. When you open an email sent by MailChimp, a file included in the email (called a web beacon) connects to MailChimp's servers in the United States. This allows us to determine if a newsletter message has been opened and which links you click on. In addition, technical information is collected (e.g. time of retrieval, IP address, browser type, and operating system). This information cannot be assigned to a specific recipient. It is used exclusively for the statistical analysis of our newsletter campaigns. The results of these analyses can be used to better tailor future newsletters to your interests.

If you do not want your usage of the newsletter to be analyzed by MailChimp, you will have to unsubscribe from the newsletter. For this purpose, we provide a link in every newsletter we send. You can also unsubscribe from the newsletter directly on the website.

Data processing is based on Art. 6 (1) (a) DSGVO. You may revoke your consent at any time by unsubscribing to the newsletter. The data processed before we receive your request may still be legally processed.

The data provided when registering for the newsletter will be used to distribute the newsletter until you cancel your subscription when said data will be deleted from our servers and those of MailChimp. Data we have stored for other purposes (e.g. email addresses for the members area) remains unaffected.

For details, see the MailChimp privacy policy at <https://mailchimp.com/legal/terms/> and <https://www.mailjet.com/privacy-policy/>

### **Youtube**

Glossom uses plugins from YouTube, which is operated by Google. The operator of the pages is YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA.

If you visit one of our pages featuring a YouTube plugin, a connection to the YouTube servers is established. Here the YouTube server is informed about which of our pages you have visited.

If you're logged in to your YouTube account, YouTube allows you to associate your browsing behavior directly with your personal profile. You can prevent this by logging out of your YouTube account.

YouTube is used to help make our website appealing. This constitutes a justified interest pursuant to Art. 6 (1) (f) GDPR – DSGVO.

Further information about handling user data, can be found in the data protection declaration of YouTube under <https://www.google.de/intl/de/policies/privacy>.

## **Facebook**

We offer the feature "Facebook Connect", which is offered by Facebook Inc., optionally for creating your customer account as well as for logging into our website and applications. You can also use Facebook Connect to recommend Glossom or our offers to your Facebook friends.

If you want to use this function, you will first be redirected to Facebook. There you will be asked to log in with your username and password. Of course we do not take note of your registration data/credentials. If you are already logged in to Facebook, this step will be skipped.

Afterwards Facebook informs you, which data are transmitted to us (public profile, friends list, Email address and current place of residence). You confirm this with the button "OK". With the transmitted data we create your customer account, whereby of course your friend list is not stored by us. For logging into Glossom via Facebook login, a Facebook generated unique token (a long string of letters and numbers) is also stored, which is exchanged with Facebook during the login process for secure authentication.

The purpose and scope of the data collection and the further processing and use of the data by Facebook, as well as your related rights and settings options for the protection of your privacy, please refer to the privacy policy at <https://www.facebook.com/policy.php> and the terms of use at <https://www.facebook.com/legal/terms> from Facebook.

In the context of usage-based online advertising, the product Custom Audiences of Facebook (Facebook Custom Audiences) is also used on the website or in the app. A Facebook cookie is set. Through Facebook Pixel we collect information about your activities on the website and behavioral files.

The cookies do not collect any personal information and can not be associated with such information.

For more information on the purpose and scope of the data collection and the further processing and use of the data, as well as the privacy settings, please refer to the privacy policy of Facebook. If you wish to opt out of using Facebook Custom Audiences, you can do so at [https://www.facebook.com/ads/website\\_custom\\_audiences/](https://www.facebook.com/ads/website_custom_audiences/).

<b>Provider</b>	<b>Type</b>	<b>Data transmission to third countries</b>	<b>3rd Country</b>	<b>Garanty gem. Art. 44ff DS-GVO</b>
Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;	Data Processor	yes	USA	EU-US Privacy Shield
Amazon Web Services, Inc. Suite 1200 Seattle, WA 98144 United States	Data Processor	yes	USA	EU-US Privacy Shield
Mailchimp Rocket Science Group LLC, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA	Data Processor	yes	USA	EU-US Privacy Shield
Mailjet 13-13 bis, rue de l'Aubrac 75012 Paris, France	Data Processor	NO	-	-
YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA	Data Processor	yes	USA	EU-US Privacy Shield
Facebook Inc. 1601 WILLOW ROAD MENLO PARK, CA 94025, USA	Data Processor	yes	USA	EU-US Privacy Shield

See, more info about how is this information used in section-2.

## II. How do we use this information?

We use the information we have (subject to choices you make) as described below and to provide and support the Glossom Products and related services described in the Glossom Terms. Here's how:

**Provide, personalize and improve our Products.**

We use the information we have to deliver our Products, including to personalize features and content (including your Video Feed, Look of the day videos, product lists and ads) and make suggestions for you (such as groups or events you may be interested in or topics you may want to follow) on and off our Products. To create personalized Products that are unique and relevant to you, we use your connections, preferences, interests and activities based on the data we collect and learn from you and others; how you use and interact with our Products; and the people, places, or things you're connected to and interested in on and off our Products. Learn more about how we use information about you to personalize your Glossom experience, including features, content and recommendations in Glossom Products; you can also learn more about how we choose the ads that you see.

- Information across Glossom Products and devices: We connect information about your activities on different Glossom Products and devices to provide a more tailored and consistent experience on all Glossom Products you use, wherever you use them.
- Location-related information: We use location-related information-such as your current location, where you live, the places you like to go, and the businesses and people you're near-to provide, personalize and improve our Products, including ads, for you and others. Location-related information can be based on things like precise device location (if you've allowed us to collect it), IP addresses, and information from your and others' use of Glossom Products.
- Product research and development: We use the information we have to develop, test and improve our Products, including by conducting surveys and research, and testing and troubleshooting new products and features.
- Face recognition: If you have it turned on, we use face recognition technology to recognize you in photos, videos and camera experiences. The face-recognition templates we create are data with special protections under EU law. If we introduce face-recognition technology to your Glossom

experience, we will let you know first, and you will have control over whether we use this technology for you.

- Ads and other sponsored content: We use the information we have about you—including information about your interests, actions and connections—to select and personalize ads, offers and other sponsored content that we show you.

#### **Provide measurement, analytics, and other business services.**

We use the information we have (including your activity off our Products, such as the websites you visit and ads you see) to help advertisers and other partners measure the effectiveness and distribution of their ads and services, and understand the types of people who use their services and how people interact with their websites, apps, and services.

#### **Promote safety, integrity and security.**

We use the information we have to verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of our Products, and promote safety and security on and off of Glossom Products. For example, we use data we have to investigate suspicious activity or violations of our terms or policies, or to detect when someone needs help.

#### **Communicate with you.**

We use the information we have to send you marketing communications, communicate with you about our Products, and let you know about our policies and terms. We also use your information to respond to you when you contact us.

#### **Research and innovate for social good.**

We use the information we have to conduct and support research and innovation on topics of general social welfare, technological advancement, public interest, health and well-being.

## **III. How is this information shared?**

Your information is shared with others in the following ways:

### Sharing on Dubme Products

#### **People and accounts you share and communicate with**

Public information can be seen by anyone, on or off our Products, including if they don't have an account. This includes your Glossom username; any information you share with a public audience; information in your public profile on Glossom; and content you share, public Glossom account or any other public forum, such as Glossom Marketplace. You, other people using Glossom, and we can provide access to or send public information to anyone on or off our Products, including in other Dubme Company Products, in search results, or through tools and APIs. Public information can also be seen, accessed, reshared or downloaded through third-party services such as search engines, APIs, and offline media such as TV, and by apps, websites and other services that integrate with our Products.

#### **Content others share or reshare about you**

People who can see your activity on our Products can choose to share it with others on and off our Products, including people and businesses outside the audience you shared with. For example, when you share a post or send a message to specific friends or accounts, they can download, screenshot, or reshare that content to others across or off our Products, in person. Also, when you comment on someone else's post or react to their content, your comment or reaction is visible to anyone who can see the other person's content, and that person can change the audience later.

People can also use our Products to create and share content about you with the audience they choose. For example, people can share a photo of you in another photo, mention or tag you at in a post, or share information about you in their posts or messages. If you are uncomfortable with what others have shared about you on our

Products, you can report the content by tapping on the more button and report or contact us directly on support@glossom.tv

### **Apps, websites, and third-party integrations on or using our Products.**

When you choose to use third-party apps, websites, or other services that use, or are integrated with, our Products, they can receive information about what you post or share. For example, when you play a video or use a Glossom Comment or Share button on a website, the developer or website can receive information about your activities in the widget/tool or receive a comment or link that you share from the website on Glossom. Also, when you download or use such third-party services, they can access your public profile on Glossom, and any information that you share with them. Apps and websites you use may receive your list of followers/following if you choose to share it with them. But apps and websites you use will not be able to receive any other information about any of your followers (although your followers may, of course, choose to share this information themselves). Information collected by these third-party services is subject to their own terms and policies, not this one.

Devices and operating systems providing native versions of Glossom (i.e. where we have not developed our own first-party apps) will have access to all information you choose to share with them, including information your friends share with you, so they can provide our core functionality to you.

### **New owner.**

If the ownership or control of all or part of our Products or their assets changes, we may transfer your information to the new owner.

### Sharing with Third-Party Partners

We work with third-party partners who help us provide and improve our Products or who use Glossom Tools to grow their businesses, which makes it possible to operate our companies and provide free services to people around the world. We don't sell any of your information to anyone, and we never will. We also impose strict restrictions on how

our partners can use and disclose the data we provide. Here are the types of third parties we share information with:

**Partners who use our analytics services.**

We provide aggregated statistics and insights that help people and businesses understand how people are engaging with their posts, listings, Pages, videos and other content on and off the Glossom Products. For example, Page admins and Glossom business profiles receive information about the number of people or accounts who viewed, reacted to, or commented on their posts, as well as aggregate demographic and other information that helps them understand interactions with their Page or account.

**Advertisers.**

We provide advertisers with reports about the kinds of people seeing their ads and how their ads are performing, but we don't share information that personally identifies you (information such as your name or email address that by itself can be used to contact you or identifies who you are) unless you give us permission. For example, we provide general demographic and interest information to advertisers (for example, that an ad was seen by a woman between the ages of 25 and 34 who lives in Madrid and likes certain type of foundation) to help them better understand their audience. We also confirm which ads led you to make a purchase or take an action with an advertiser.

**Measurement partners.**

We share information about you with companies that aggregate it to provide analytics and measurement reports to our partners.

Partners offering goods and services in our Products.

When you subscribe to receive premium content, or buy something from a seller in our Products, the content creator or seller can receive your public information and other information you share with them, as well as the information needed to complete the transaction, including shipping and contact details.

**Vendors and service providers.**

We provide information and content to vendors and service providers who support our business, such as by providing technical infrastructure services, analyzing how our Products are used, providing customer service, facilitating payments or conducting surveys.

#### **Researchers and academics.**

We also provide information and content to research partners and academics to conduct research that advances scholarship and innovation that support our business or mission, and enhances discovery and innovation on topics of general social welfare, technological advancement, public interest, health and well-being.

#### **Law enforcement or legal requests**

We share information with law enforcement or in response to legal requests in the circumstances outlined below.

## V. What is our legal basis for processing data?

We collect, use and share the data that we have in the ways described above:

- as necessary to fulfill our Glossom Terms of Use;
- consistent with your consent, which you may revoke at any time by contacting us on [support@glossom.tv](mailto:support@glossom.tv)
- as necessary to comply with our legal obligations
- to protect your vital interests, or those of others;
- as necessary in the public interest; and
- as necessary for our (or others') legitimate interests, including our interests in providing an innovative, personalized, safe, and profitable service to our users and partners, unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data.

## VI. How can you exercise your rights provided under the GDPR?

Under the General Data Protection Regulation, you have the right to access, rectify, port and erase your data. Learn more about these rights, and find out how you can exercise your rights. You also have the right to object to and restrict certain processing of your data. This includes:

- the right to object to our processing of your data for direct marketing, which you can exercise by using the "unsubscribe" link in such marketing communications; and
- the right to object to our processing of your data where we are performing a task in the public interest or pursuing our legitimate interests or those of a third party. You can exercise this right contacting us on [support@glossom.tv](mailto:support@glossom.tv).

## VII. Data retention, account deactivation and deletion

We store data until it is no longer necessary to provide our services and Dubme Products, or until your account is deleted - whichever comes first. This is a case-by-case determination that depends on things like the nature of the data, why it is collected and processed, and relevant legal or operational retention needs. The expiration date of your data for deletion when not used is 52 Months from its last accessed date.

When you delete your account, we delete things you have posted, such as your photos and status updates, and you won't be able to recover that information later. Information that others have shared about you isn't part of your account and won't be deleted. If you

don't want to delete your account but want to temporarily stop using the Products, you can deactivate your account instead. To delete your account at any time, please contact us on [support@glossom.tv](mailto:support@glossom.tv)

You are entitled to view, amend, or delete the personal information that we hold. Email your request to our data protection officer Fatih Giriskan ([fatih@glossom.tv](mailto:fatih@glossom.tv)).

If you have any questions about how Dubme uses your personal data that are not answered here, or if you want to exercise your rights regarding your personal data, please contact us by any of the following means:

Send us an email to [hello@dubme.tv](mailto:hello@dubme.tv)

Send us a letter to Dubme GmbH, Panoramastr. 1, 10178 Berlin, Germany

<b>Verantwortlicher für die Datenverarbeitung</b>	<b>Datenschutzbeauftragter des Verantwortlichen</b>
Dubme GmbH Panoramastr, 1, 10178 Berlin,Germany. EMail:hello@dubme.tv	Dubme GmbH Datenschutzbeauftragter Panoramastr, 1, 10178 Berlin,Germany. E-Mail: support@dubme.tv

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