
PRIVACY AND COOKIES POLICY

1. ABOUT THIS POLICY.

- 1.1. Teodora's Network Ltd is committed to protecting and respecting your privacy. This policy sets out who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data, so please read it carefully. This policy applies to your use of <https://www.teodorasnetwork.com/> (the "Website") or any services offered through or associated with the Website (the "Services").
 - 1.2. The Website comprises of two platforms: a database platform known as "Teodora's Anonymous Portal" which allows users to upload information anonymously and a social platform known as "TN Social Media" which allows users to interact on the Website.
 - 1.3. Users of Teodora's Anonymous Portal are encouraged to do so anonymously and are not required to provide personal data, whereas users of TN Social Media are required to provide some basic personal data. We have indicated below the sections relating to personal data which mainly apply to TN Social Media users and the sections, such as our Cookie Policy, which apply to all users, both TN Social Media and Teodora's Anonymous Portal.
 - 1.4. Your use of the Website is also subject to the User Terms and Conditions (including our Acceptable Use Standards) which can be found in our privacy policy.
 - 1.5. By using the Website users agree to comply the Users Terms, however we do not actively monitor or restrict content uploaded by users to the Teodora's Anonymous Portal or TN Social Media and this policy is not directed at third parties whose personal data may be disclosed on the Website or intended to provide additional rights to those under general law.
 - 1.6. This Website is not intended for children and we do not knowingly collect data relating to children.
- ### 2. WHAT IS "PERSONAL DATA"?
- 2.1. "Personal data" means any information that identifies an individual person. It does not include data about a company or anonymous data (i.e. data where the personal identity has been removed.)

3. ABOUT US.

- 3.1. The Website is owned and operated by Teodora's Network Ltd, a limited company registered in England and Wales under company number 13853835 with registered address at Kemp House, 124 City Road, London, United Kingdom, EC1V 2NX. When we process personal data, we are responsible as a "controller" of that personal data for the purposes of the General Data Protection Regulation and the Data Protection Act 2018 (the "data protection laws"). In this policy, "we", "us" or "our" refers to Teodora's Network Ltd.
- 3.2. The Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy policy of every website you visit.

The following sections 5 to 13 (inclusive) are mainly relevant to users of TN Social Media.

4. HOW WE COLLECT DATA.

- 4.1. Most of the data we collect is collected directly from you — you give us personal data when you visit our Website or when you communicate with us by email. This includes data you provide when you fill out forms on our Website (like registering to use the Website, subscribing to our mailing list, or using other interactive features). We may also receive information from third parties, like payment service providers (ie. Stripe, Memberful and Zapier), third-party social media (including Instagram, and YouTube) and other third parties we use to help us deliver our Services. For more information on how these companies handle your personal data, please refer to their privacy policies.

5. DATA WE COLLECT ABOUT YOU.

- 5.1. In operating TN Social Media we ensure user anonymity on our Website by collecting personal data that only includes your name, contact information (email address only) and location data (only if provided by the user).
- 5.2. We encourage our users of the Teodora's Anonymous Portal to submit the data anonymously through the Website. Names and contact information will be deleted, if not submitted anonymously.

6. HOW AND WHY WE USE YOUR DATA.

- 6.1. Under data protection laws, we can only use your personal information if we have a proper reason for doing so, such as complying with our legal and regulatory obligations, fulfilling contractual obligations to you (or taking any steps at your request before entering into a contract), where you have given consent or for our (or a third party's) legitimate interest. (A "legitimate interest" is when we have a business or commercial reason to use your information, which is a proper reason for using your personal data as long as it's not overridden by your own rights and interests.) This section explains what we use your personal information for and our reasons for doing so.

(a) Providing our Website and other online platforms to you. We use your personal data to administer the Website (for example as a source of data you may provide), to ensure content from the Website is presented in the most effective manner for you and for your device, as part of our efforts to keep the Website safe and secure and to allow you to participate in interactive features of our Website (when you choose to do so). We use your personal data this way for our legitimate interests in maintaining our Website.

(b) Providing Services to you. We use your personal data to create news stories and documentaries, so data and information received may contain personal data from non-user parties or be unethical. We encourage you to ensure all data uploaded for use on the Anonymous Portal is provided anonymously.

We also use your personal data for internal operations, to administer and manage your account, respond to communications from you and provide you with information you request from us, notify you about changes to the Services and carry out any other obligations arising from any contracts entered into between you and us. We use your personal data this way to fulfill contractual obligations to you (or take steps at your request before entering into a contract).

(c) Improving our Website and Services. We use your personal data to make our Website and Services better, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

(d) Improving our marketing. We use your personal data to measure and understand the effectiveness of our marketing efforts, deliver relevant marketing to you and make relevant suggestions and recommendations to you. We use your personal data this way for our legitimate interests in promoting our business and Services.

(e) Complying with legal obligations. We also use your personal data to comply with legal obligations like mandatory reporting and record retention, ensuring confidentiality of commercially sensitive information and responding to any requests from regulatory or legal authorities.

(f) Handling sensitive data. Certain personal data we collect is extremely sensitive, so it is considered a “special category” of personal data under data protection laws. We won’t collect your biometric data, medical history, race, gender, sexual orientation, religion, political affiliation without your explicit consent.

6.2. We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground applies.

6.3. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

7. MARKETING AND PROMOTIONAL COMMUNICATIONS.

7.1. We have a legitimate interest in processing your personal information for promotional purposes, which means we don't usually need your consent to send you these types of communications. However, we'll only send you updates about Services you have used or that we think you might be interested in, including exclusive offers, promotions or new Services. We won't subscribe you to our mailing list without your explicit consent. You can ask us to stop sending you marketing messages at any time by the following opt-out links on such marketing messages or by contacting us at info@teodorasnetwork.com.

8. WHO WE SHARE YOUR DATA WITH.

8.1. We routinely share personal information with third parties we use to help run our business and deliver our Services. We refer you to section 4.1 and to the privacy policies of the relevant third parties for further information on how they treat your personal information.

8.2. We use a third-party payment processor, Stripe, to process all payments made by you on our Website. Teodora's Network Ltd does not store credit card details and instead relies on Stripe for this. We obtain limited information from Stripe such as the last four digits, the country of issuance and the expiration date. The processing of such data by Stripe is covered by their privacy policy which may be viewed here: <https://stripe.com/privacy>.

Stripe's services in Europe are provided by a Stripe affiliate, Stripe Payments Europe Limited, an entity located in Ireland. In providing its payment processing services, Stripe Payments Europe Limited transfers personal data to Stripe, Inc. in the US. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of Stripe's privacy policy entitled "International Data Transfers."

8.3. We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations, enforce any of our rights or protect ourselves and others.

8.4. We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a restructuring. The recipient will only be permitted to use the data for the purposes we originally collected it for, and they will be bound by confidentiality obligations.

9. HOW LONG WE KEEP YOUR DATA.

9.1. We keep your personal data while you have an account with us or we are providing Services to you. You can tell us to stop providing Services to you by deleting your account or contacting us. After that, we keep your personal information for as long as is necessary to respond to any questions, complaints or claims made by you or on your behalf, to show that we treated you fairly and to keep records required by law. We won't retain your personal data for longer than necessary for the purposes set out in this policy. However, please note that different retention periods apply for different types of personal data.

9.2. All data submitted on the Anonymous Portal will be reviewed by a team of lawyers, who decide if we can publish the data as a news story. We store data submitted by anonymous users indefinitely if the data is used as a source or to create a news story on Teodora's Network Ltd. Any data submitted that is not used on Teodora's Network Ltd will be deleted. This process includes deleting data held by third parties.

9.3. In some circumstances we will anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. HOW WE SECURE YOUR DATA.

10.1. We have appropriate security measures to prevent personal information from being accidentally lost or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

10.2. We also have procedures in place to deal with any suspected data security breach. We'll notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

10.3. Unfortunately, sending personal data via the internet is not completely secure. Although we do our best to protect your personal data, we can't guarantee the security of data sent to our Website, and you send personal data to us at your own risk.

11. WHERE YOUR DATA IS STORED.

11.1. To deliver our Services to you, it's sometimes necessary for us to share your personal information outside the UK and/or the European Economic Area (EEA), for example with service providers located outside the UK/EEA or if you are based outside the UK/EEA. These transfers are subject to special rules under data protection laws. Although non-UK/EEA countries don't have the same data protection laws as the UK/EEA, however we will ensure the transfer complies with data protection laws and that all personal data will be secure. Where this is the case personal data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification, the Processor Binding Corporate Rules, or another adequacy mechanism established under applicable data protection law. If you'd like more information about what happens to your personal data when it's transferred outside the UK/EEA, please contact us.

12. YOUR RIGHTS.

12.1. Under data protection laws you have the right to:

- (a) Be informed: the right to be informed of what personal data we have about you and our purpose for processing it.
- (b) Access: the right to be provided with a copy of your personal data.
- (c) Rectification: the right to require us to correct any mistakes in your personal data.

- (d) Be forgotten: the right to require us to delete your personal data—in certain situations.
- (e) Restriction: the right to require us to restrict processing of your personal data—in certain circumstances.
- (f) Portability: the right to receive the personal data you provided to us in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations.
- (g) Object: the right to object to your personal data being processed for direct marketing (including profiling) and, in certain circumstances, the right to object to our continued processing of your personal data.
- (h) Not to be subject to automated decision-making: the right not to be subject to a decision that has legal effects on you or significantly affects you based solely on automated processing (including profiling).
- (i) Complain: the right to complain to a supervisory authority if you think any of your rights have been infringed by us. In the UK, this is the Information Commissioner's Office (ICO).

12.2. If you would like to exercise any of these rights, please contact us at info@teodorasnetwork.com.

13. COOKIES (AND OTHER SIMILAR TECHNOLOGIES).

This section 14 is relevant to all users of Website, TN Social Media and Teodora's Anonymous Portal.

13.1. What are cookies? A cookie is a small (ordinarily, text) file of letters and numbers that we store on your browser. Cookies contain information that is transferred to your computer's hard drive (or the hard drive of another relevant device). We use cookies to distinguish you from other users on the Website, to tailor your experience to your preferences, and to help us improve the Website.

13.2. Cookies we use.

- (a) Strictly necessary cookies. These cookies are required to save your session and to carry out other activities that are strictly necessary for the operation of the Website. They include, by way of general example, cookies that enable you to log into secure areas of the Website, use a shopping cart, or make use of e-billing services. These cookies are session cookies, which means they're temporary and will usually expire when you close your browser.
- (b) Functionality cookies. These cookies are used to recognise you when you return to the Website. They enable us to personalise our content for you, greet you by name and remember your preferences.
- (c) Social media cookies. These cookies work together with social media plug-ins, including Instagram and YouTube. For example, when we embed photos, video and other content from social media websites, the embedded pages contain cookies from these websites. Similarly, if you choose to share our content on social media, a cookie may be set by the service you have chosen to share content through.

- (d) Third party cookies. Please note that some of the above cookies are placed by third parties (such as Google Analytics, which we use for understanding user interaction with the Website) and that the Website does not block third party cookies.

13.3. Disabling cookies.

- (a) By default, most internet browsers accept cookies, but you can choose to enable or disable some or all cookies via the settings on your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. For further details, please consult the help menu in your internet browser.
- (b) Some of the cookies we use are essential for the Website to operate. If you use your browser settings to block essential cookies, you may not be able to access all or parts of our Website.
- (c) You have the right to opt out of social media cookies and third-party cookies. To enforce this right, please contact us at info@teodorasnetwork.com or the appropriate third party.

13.4. Duration. Except for essential cookies, all cookies will expire after 30 days.

13.5. Hidden fields. Hidden fields are a mechanism used to store information on a webpage. Users can't typically see hidden fields or submit information through them. We use hidden fields to help present our Website in the best way for you and your device (for example, to retain information about what language you're viewing the Website in).

14. CHANGES TO THIS POLICY

14.1. We keep this privacy and cookie policy under review. Any changes we may make to this policy will be posted on this page (and, where appropriate, notified to you by email). Please check back frequently for updates and changes. Use of personal data we collect now is subject to the Policy in effect at the time such information is used. Users are bound by the policy at the time when they use the Services.

15. KEEPING INFORMATION UP-TO-DATE.

15.1. It is important that the personal data we hold about you is accurate and current. Third party marketing and mailing list service provider Mailchimp determines the accuracy and up-to-date information on user email addresses. Please keep us informed if your personal data changes during your relationship with us.

16. CONTACT US.

16.1. Questions, comments and requests regarding this policy are welcomed. You can contact us by post at our registered address (above) or by email at info@teodorasnetwork.com.

17. NO FEE USUALLY REQUIRED.

17.1. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

18. WHAT WE MAY NEED FROM YOU.

18.1. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

19. TIME LIMIT TO RESPOND.

19.1. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.