## **Our Privacy Policy**

## Hi all you who have interest in GDPR,

My name is Alexander and I'm the Data Protection Officer and point of contact at Uberportal.tv on this subject. I want to personally assure you, that at Uberportal.tv, we fully respect the privacy of our users and have taken all the necessary steps to ensure the highest level of data protection for our clients. We strictly follow all applicable legal requirements including that of GDPR.

Uberportal.tv processes and stores personal data of its clients. This Privacy Policy explains how we use, disclose, and safeguard personal information. This policy also explains your choices about how we use information about you. Your choices include how you can object to certain uses of information about you and how you can access and update certain information about you. If you do not agree with this policy, please do not access or use our Services or interact with any other aspect of our business. We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the "Revised" date of this Privacy Policy. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on the Site, and you waive the right to receive specific notice of each such change or modification. You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Site after the date such revised.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to the Uberpoertal.tv. By means of this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects

are informed, by means of this data protection declaration, of the rights to which they are entitled.

If you any questions or comments about the Policy, your Personal Data, our use and disclosure practices, or your consent choices by emailing me at: ad@uberportal.tv.

Best regards,

# Alexander Draganov DPO

#### **Definitions**

The data protection declaration of the Uberportal.tv is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, inter alia, the following terms:

**Client** is a customer of Uberportal.tv.

**Client Data** are personal data, reports, addresses, and other files, folders or documents in electronic form that a User of the Service stores within the Service.

**Consent** of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

**Controller** is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

**Data subject** is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

**Personal data** means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an

identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Processing** is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Processor** is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

**Profiling** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

**Pseudonymization** is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

**Public area** is the area of the Site that can be accessed both by Users and Visitors, without needing to log in.

**Recipient** is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

**Restricted area** is the area of the Site that can be accessed only by Users, and where access requires logging in.

**Restriction of processing** is the marking of stored personal data with the aim of limiting their processing in the future.

**Third party** is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

**User** is an employee, freelancer, or representative of a Client, who primarily uses the restricted areas of the Site for the purpose of accessing the Service in such capacity.

**Visitor** is an individual other than a User, who uses the public area, but has no access to the restricted areas of the Site or Service.

## How we collect personal data

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. The legal bases for Uberportal.tv's processing of personal data is primarily that the processing is necessary for providing the Service in accordance with Uberportal.tv's Terms of Service and that the processing is carried out in Uberportal.tv's legitimate interests, which are further explained in the section "How We Use the Information" of this Policy.

The personal information that we process is collected by our clients. A Client or User may store or upload into the Service Client Data. Uberportal.tv has no direct relationship with the individuals whose Personal Data it hosts as part of Client Data. Each Client is responsible for providing notice to its customers and third persons concerning the purpose for which Client collects their Personal Data and how this Personal Data is processed in or through the Service as part of Client Data.

You may be given the option to access or register for the Service through the use of your user name and passwords for certain services provided by third parties (each, an "Integrated Service"), such as through the use of your Google account, or other social media providers or otherwise have the option to authorize an Integrated Service to provide Personal Data or other information to us. By authorizing us to connect with an Integrated Service, you authorize us to access and store your name, email address(es), date of birth, gender, current city, profile picture URL, and other information that the Integrated Service makes available to us, and to use and disclose it in accordance with this Policy. You should check your privacy settings on each Integrated Service to understand what information that Integrated Service makes available to us, and make changes as appropriate. Please review each Integrated Service's terms of use and privacy policies carefully before using their services and connecting to our Service.

You may be given the option to access or register for the Service through the use of your user name and passwords for certain services provided by third parties (each, an "Integrated Service"), such as through the use of your Google or Facebook account, or other social media providers or otherwise have the option to authorize an Integrated Service to provide Personal Data or other information to us. By authorizing us to connect with an Integrated Service, you authorize us to access and store your

name, email address(es), date of birth, gender, current city, profile picture URL, and other information that the Integrated Service makes available to us, and to use and disclose it in accordance with this Policy. You should check your privacy settings on each Integrated Service to understand what information that Integrated Service makes available to us, and make changes as appropriate. Please review each Integrated Service's terms of use and privacy policies carefully before using their services and connecting to our Service.

Current Integrated Service Providers that allow you to register for the Service are Google, Facebook, LinkedIn, and Microsoft. Please note that your data is collected and controlled in accordance with their respective terms of use and privacy policies in addition to ours. We do not bear responsibility for any unlawful use of your data that has occurred within those Integrated Service Providers. Of course, we maintain a high standard of data protection and strive to provide you with the best and most secure experience while using our Service.

#### How we use personal data

We use the information to operate, maintain, enhance and provide all features of the Service, to provide the services and information that you request, to respond to comments and questions and to provide support to users of the Service. We process Client Data solely in accordance with the directions provided by the applicable Client. (The Controller of the data).

#### To whom we disclose personal data

Except as described in this Policy, we will not intentionally disclose the Personal Data or Client Data that we collect or store on the Service to third parties.

Data protection provisions about the application and use of Google Analytics

On this website, the controller has integrated the component of Google Analytics (with the anonymize function). Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behavior of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website and in order to carry out a cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

For the web analytics through Google Analytics the controller uses the application "\_gat. \_anonymizelp". By means of this application the IP address of the Internet connection of the data subject is abridged by Google and anonymized when accessing our websites from a Member State of the European Union or another Contracting State to the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyze the traffic on our website. Google uses the collected data and information, inter alia, to evaluate the use of our website and to provide online reports, which show the activities on our websites, and to provide other services concerning the use of our Internet site for us.

Google Analytics places a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google is enabled to analyze the use of our website. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and into which a Google Analytics component was integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google Analytics component for the purpose of online advertising and the settlement of commissions to Google. During the course of this technical procedure, the enterprise Google gains knowledge of personal information, such as the IP address of the data subject, which serves Google, inter alia, to understand the origin of visitors and clicks, and subsequently create commission settlements.

The cookie is used to store personal information, such as the access time, the location from which the access was made, and the frequency of visits of our website by the data subject. With each visit to our Internet site, such personal data, including the IP address of the Internet access used by the data subject, will be transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google Analytics from setting a cookie on the information technology system of the data subject. In addition, cookies already in

use by Google Analytics may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data that are generated by Google Analytics, which is related to the use of this website, as well as the processing of this data by Google and the chance to preclude any such. For this purpose, the data subject must download a browser add-on under the link <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a> and install it. This browser add-on tells Google Analytics through a JavaScript, that any data and information about the visits of Internet pages may not be transmitted to Google Analytics. The installation of the browser add-ons is considered an objection by Google. If the information technology system of the data subject is later deleted, formatted, or newly installed, then the data subject must reinstall the browser add-ons to disable Google Analytics. If the browser add-on was uninstalled by the data subject or any other person who is attributable to their sphere of competence, or is disabled, it is possible to execute the reinstallation or reactivation of the browser add-ons.

Further information and the applicable data protection provisions of Google may be retrieved under <a href="https://www.google.com/intl/en/policies/privacy/">https://www.google.com/intl/en/policies/privacy/</a> and under <a href="http://www.google.com/analytics/terms/us.html">http://www.google.com/analytics/</a> is further explained under the following Link <a href="https://www.google.com/analytics/">https://www.google.com/analytics/</a>.

#### Data security

We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. We maintain appropriate administrative, technical and physical safeguards to protect Personal Data against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the Personal Data in our possession. This includes, for example, firewalls, password protection and other access and authentication controls. We use SSL technology to encrypt data during transmission through public internet, and we also employ application-layer security features to further anonymize Personal Data.

If we learn of a security systems breach, we will inform the data controllers and the authorities of the occurrence of the breach in accordance with applicable law.

#### **Data retention**

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract or the initiation of a contract.

## **Data Controller and Data Processor**

Uberportal.tv does not own, control or direct the use of any of the Client Data stored or processed by a Client or User via the Service. Only the Client or Users are entitled to access, retrieve and direct the use of such Client Data. Uberportal.tv is largely unaware of what Client Data is actually being stored or made available by a Client or User to the Service and does not directly access such Client Data except as authorized by the Client, or as necessary to provide Services to the Client and its Users.

Because Uberportal.tv does not collect or determine the use of any Personal Data contained in the Client Data and because it does not determine the purposes for which such Personal Data is collected, the means of collecting such Personal Data, or the uses of such Personal Data, Uberportal.tv is not acting in the capacity of data controller in terms of the European Union's General Data Protection Regulation (Regulation (EU) 2016/679, hereinafter "GDPR") and does not have the associated responsibilities under the GDPR. Uberportal.tv should be considered only as a processor on behalf of its Clients and Users as to any Client Data containing Personal Data that is subject to the requirements of the GDPR. Except as provided in this Privacy Policy, Uberportal.tv does not independently cause Client Data containing Personal Data stored in connection with the Services to be transferred or otherwise made available to third parties, except to third party subcontractors who may process such data on behalf of Uberportal.tv in connection with Uberportal.tv's provision of Services to Clients. Such actions are performed or authorized only by the applicable Client or User.

The Client or the User is the data controller under the Regulation for any Client Data containing Personal Data, meaning that such party controls the manner such Personal Data is collected and used as well as the determination of the purposes and means of the processing of such Personal Data.

Uberportal.tv is not responsible for the content of the Personal Data contained in the Client Data or other information stored on its servers (or its subcontractors' servers) at the discretion of the Client or User nor is Uberportal.tv responsible for the manner

in which the Client or User collects, handles disclosure, distributes or otherwise processes such information.

## **Existence of automated decision-making**

As a responsible company, we do not use automatic decision-making or profiling.

Changes and Updates to this Policy

Please revisit this page periodically to stay aware of any changes to this Policy, which we may update from time to time. If we modify the Policy, we will make it available through the Service, and indicate the date of the latest revision, and will comply with applicable law. Your continued use of the Service after the revised Policy has become effective indicates that you have read, understood and agreed to the current version of the Policy.

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