

## **PRIVACY POLICY**

### **Viewgin**

This document contains very important information regarding your rights and obligations, as well as conditions, limitations, and exclusions that might apply to you. Please read it carefully.

### **About Viewgin**

Welcome to Viewgin, where we value our privacy as high as our users, customers, vendors and everyone else on this Planet Earth. Viewgin operates as a SaaS platform, which gives users access to social media management and analytical tools.

### **The Viewgin's Privacy Policy and what it means to you**

This privacy policy ("policy") will help our users understand how Viewgin LLC ("us", "we", «our») along with Viewgin Terms of Service [viewgin.com/terms.pdf](https://viewgin.com/terms.pdf) . Use and protect the data users provide to us when they visit and use <https://viewgin.com> («website», «service»).

We are guided by our understanding that not everyone wants to share everything with everyone – including with Viewgin. It's important that all users have choices for how others use or view their data. We reserve the right to change this policy, of which you will be promptly updated. If you want to make sure that you are up to date with the latest changes, we advise you to check a date at the end of this document.

By visiting our Site and/or using any of our Services, you agree to have your personal information handled as per this policy. Viewgin collects information about you directly from you, from third parties, and automatically through your use of our Site and/or Services.

You may not become our client if you:

- Do not agree with this agreement.
- Are not older than 13 years.
- Are prohibited from accessing or using this website or any of this website content or service by applicable law

### **What User Data We Collect**

We automate and calculate some data, but all data you see on Viewgin is public data, the same that you will see on your social media account if you don't give any access for us to private one. We don't store, show or share private information unless explicitly stated and requested, and permission is granted. If permission is granted.

### **The major ways we collect our data are**

- Research team (collect data manually)
- Official API services
- Partner and External APIs

- Unstructured Public Information

How we use Unstructured Public Information:

- Receive updates whenever a given influencer or creator is added to some publicly available influencer directories
- Monitor announcements of promotions, news, upcoming product launches, promotions on personal websites
- Collect contact data from individuals who list this information publicly on their personal website
- Identify personal website source codes to learn about products creators use, sentiment analysis, brand collaborations

### **How we use Official API Services**

In order to keep statistical data updated, Viewgin uses API services of third parties, including but not limited to Facebook (<https://developers.facebook.com/devpolicy>) , Instagram, Twitch (<https://twitch.tv/p/en/legal/developer-agreement/20191115/>) , TikTok (<https://tiktok.com/legal/tik-tok-developer-terms-of-service>) , Twitter (<https://developer.twitter.com/agreement-and-policy>) , Telegram and YouTube (<https://developers.google.com/youtube/terms/api-services-terms-of-service>) . Unless specific access is asked for at time of use (i.e. to validate your identity), we are only gathering publicly available data from each of the API services, not anything private about your account that you did not allow access to. When private data is granted, collected data via the private token isn't being stored, it is just being used to verify various things. For example: how many views and where you received in the last month to see if you qualify for services and to show that you are the verified owner of the account? If you wish to revoke access, you can do so via each platform's connected services page described more on (<https://viewgin.com/profile/connected>), or open a support ticket and we will delete the token from our system(<https://viewgin.zendesk.com>)

### **How we use Partner and External APIs**

We use external APIs like SocialBlade Business API, HypeAuditor, Clearbit etc. to provide us with data points or contact information. Those data points include but are not limited to:

- Contact info
- Audience
- Gender
- Country
- Historical Data
- Auditory Analysis
- Last publications
- Hashtags
- Keywords

### **How we use Unstructured Public Information**

Our human research team focused on continuous improvement of our database. They show and fix data mistakes. Provide special expertise to the data that we get from our partners and make data science.

## **Cookies policy and Marketing User Data**

We use aggregated, non-identifying, electronic data collected from the use of our Sites and Services to operate, analyze, improve, and develop our Sites and Services.

We work with analytics providers such as Google Analytics, Mixed Panels, Facebook Pixel, which use cookies and similar technologies to collect and analyze information about the use of the Services and report on activities and trends. Google Analytics may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to ([www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)) , and opt out of them by downloading the Google Analytics opt-out browser add-on (<https://tools.google.com/dlpage/gaoptout>).

In order to fulfil our legitimate interest and improve the quality of services, we may transfer some of the personal data that is publicly available on social networks to the following service providers:

- Amazon Web Services, Inc.
- DigitalOcean, LLC
- Stripe, Inc.
- Mixpanel, Inc.
- HubSpot, Inc.
- Google Inc.
- Facebook, Inc.
- Twillio, Inc
- Mailgun, Inc
- Sentry, Inc

The service providers Google Analytics and Mixpanels are in the USA. We contracted to them via purchase of their software and maintenance services (to be used for marketing and communication with clients) and via accepting their customers terms and conditions and privacy policies published on their websites:

<https://mixpanel.com/legal/privacy-overview/>  
<https://policies.google.com/privacy?hl=en-US>

Some of our services are free. But to maintain all the servers and program teams, we need money. For this reason, we can monetize the site/app via some ads for free users. For this reason, we collect some statistical data like: email, ip, sex, browser type e.t.c with will be used only for marketing.

You come to Viewgin for analytics and insights. Analytics also help us know how many people are using the site and app, which parts of the site and app you use the most often, etc. It helps us build out things you're interested in and not focus on things you're not. Google Analytics and other analytics tools we may use from time to time to improve our service for you!

We collect historical data for social platforms from our partners and third party services described more in part «data sources».

### **How we use User Data and aggregate data**

Our legitimate interest in working with personal data are direct marketing purposes as said in Recital 47 GDPR (EU GDPR), and Statistical purposes referring to Recitals 113 and 162 GDPR.

However, under US law (as The California Consumer Privacy Act), there is no concept of Legitimate Interest. The law does not enumerate specific bases for processing, although the sale of consumer information is prohibited if the consumer has opted out. By the way, you can do it via support (<https://viewgin.zendesk.com>).

Viewgin is committed to securing your data and keeping it confidential. Viewgin is doing everything possible to prevent data theft, unauthorized access, and disclosure by constantly implementing the latest technologies and software, which may help safeguard all the information collected on-line.

### **How we store user and influencer data**

In compliance with Article 5(1)(b), (c), (e) GDPR, We commit to the principles of “purpose limitation”, “data minimization”, “storage limitation”, and therefore We collect, keep, store and otherwise process only such information that is necessary to ensure our legitimate interests or to comply with a legal obligation, and for the period necessary to meet our legitimate interests.

We don't store, show or share private information unless explicitly stated and requested, and permission is granted. If permission is granted, we store only 30 days of data securely and encrypted in our database. It encrypted in our database in a way that no one can see what it (not even us) without token that we get from permission you grant for us when you logged through YouTube (Google) <https://policies.google.com/privacy> , Facebook (Meta) <https://facebook.com/privacy/policy/version> , Twitter <https://facebook.com/privacy/policy/version/20220104> or TikTok <https://www.tiktok.com/legal/privacy-policy-eea?lang=en> , you agree to the data processing third party policies of each company described above.

For our users, we store data only while the account is active (means one action in a 3 months). After your subscription will end and if there are no actions in 3 months, we will delete all info except email for future identification.

As stated above, we process the personal data got from public sources (open accounts on Instagram, YouTube, TikTok, Twitch) or through API services. The updates may take up to 20 days. If an Influencer deletes his/her account, we will also delete such personal data from our systems and make it unavailable to our customers. This synchronization may take up to 1 (one) month from the date the Influencer deleted his/her account on the relevant social

networks. We don't store public data for over 30 days from our users if permission is not granted. For historical reports, we use third party services and partners api.

Audience data is only relevant to the Influencer and is kept in an aggregated form together with information about Influencer. Once Influencer data is deleted, the Audience data of the Influencer is also deleted.

### **How to revoke data or delete an account**

Users can revoke their data which explained on <https://viewgin.com/profile/connected> page .

For Google and YouTube, you can follow this link:

<https://myaccount.google.com/permissions?continue=https%3A%2F%2Fmyaccount.google.com%2Fsecurity> or <https://myaccount.google.com/security>

You can delete all your personal data and your account in Viewgin:

Please go to My profile -> Personal Settings -> Delete my Account / Delete my personal data.

### **Data Protection and legal basis for processing**

Through this Privacy Policy We fulfill our obligation under Articles 13 and 14 GDPR to provide information on data processing to the concerned data subjects.

You can find more info about GDPR on <https://gdpr-info.eu/>

DISCLAIMER: However, sometimes (especially when we get the personal data not from the data subjects, e.g. from the social networks) we are incapable of informing each data subject (especially Influencers) rather than through this Privacy Policy.

Under Recital 62 and Article 14(5)(b), we may, because, because of a great number of Influencers, the provision of such information proves impossible or would involve a disproportionate effort (in particular for processing for statistical purposes).

We commit to take measures to protect the data subject's rights and freedoms and legitimate interests.

#### **1. Platform users.**

There is different information we collect, whether directly from you at sign up (Article 13 GDPR) or automatically via your device (for instance, personal computer, laptop, mobile phone) when you use our Sites (Article 13-14 GDPR). Under "data minimization" principle (Article 5(1)(c) GDPR), we collect and process only what is strictly necessary to provide you with our Services, no more, no less.

More information about what kind of information your browser transmits can be found on the sites of the browser companies. You can disable the transfer of cookies in the browser settings.

#### **2. Influencers etc.**

We only process information which you have already publically shared via open accounts of the social networks: Instagram, YouTube, TikTok, Twitch. We process Your personal data and ensure them to be processed in compliance with Applicable Law and namely under the principle of “lawfulness, fairness, transparency” (Art. 5(1)(a)), and we respect your rights.

**Information about Influencer (categories of personal data):**

A link to Influencer profile, full name, avatar, language, biography, country/city/state, brand and common interests, notable engaged users, sponsored posts.

2. Email and social network profile.

3. Images, graphics, photos, profiles, audio and video clips, sounds, musical works, works of authorship, applications, links and other content or materials from your social network profile.

**Legal basis for processing (Art. 14(1)(c) GDPR)**

Influencers provide their data to social networks, making it public. We handle anonymous data that we receive from public sources (Instagram, YouTube, TikTok, Twitch).

We have a legitimate interest in using the data made available by Influencers via social networks for direct marketing (Recital 47 GDPR) without affecting Influencer’s fundamental rights and freedoms.

**Purposes for processing (Art. 14(1)(c) GDPR): Reason for collection**

To allow customers to choose an Influencer for their business purposes and assess the effectiveness of each Influencer’s reach.

We analyze a vast amount of information in order to provide customers with statistics. In relation to the Influencer audience (the “Audience”), this includes, in particular, gender, age group and ethnicity. While these items may represent a somewhat sensitive issue, We have undertaken, under Article 35(7)(a) GDPR, an assessment to identify and prove our legitimate interests and to exclude that our legitimate interests be overridden by the fundamental rights and freedoms of the Audience or any individuals (Art. 6(1)(f) GDPR). We concluded that our processing for statistical purposes is in line with the Applicable Law and does not conflict with the fundamental rights and freedoms of individuals.

In order to lawfully process the data on the ethnic origin of the Audience, we require relevant legal basis. One basis is processing for statistical purposes (Art. 9(2)(j) GDPR) (while safeguarding fundamental rights and interests of the Audience) and the fact that such data (Art. 9(2)(e) are made publically available by their data subject). Such processing does not have discriminatory effects on natural persons involved, nor results in measures having such an effect. Finally, there is no automated decision-making and profiling based on ethnic origin of the Audience (Art. 14(2)(g) GDPR).

All the Data (both Raw Data and Processed Data) we collect are stored in database controlled and maintained by the company Viewgin Limited (3363 NE 163rd St, North Miami Beach, FL 33160, United States ).

The database is on the secure servers AWS Amazon, Hetzner, and Digital Ocean in Germany and USA.

### **Contact us**

If you have questions about either our Agreement or Policy, or would like to make a complaint, please file a support ticket (<https://viewgin.zendesk.com>) or directly send us a message [info@viewgin.com](mailto:info@viewgin.com).

Last edited on 7th September 2022