

PRIVACY POLICY - PARTNER COMPANIES

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Red Blu Digital Advertising UG

Terminalstrasse Mitte 18, CAP 85356 München-Flughafen, Germany

Commercial Register (Amtsgericht München): HRB 297052

E-mail: administration@redblu.net

1. INTRODUCTION

This Privacy Policy is drafted in accordance with the General Data Protection Regulation (GDPR - Regulation EU 2016/679) and applicable national regulations, and applies to the processing of personal data of representatives, contact persons, or owners of the Partner Companies that use the online advertising platform **ADPRODEX** and its connected services (such as the **Tyche** App).

2. LEGAL BASIS OF THE PROCESSING

Data processing is based on the following grounds of lawfulness (Art. 6 GDPR):

- Art. 6(1)(b) GDPR: execution of contractual and pre-contractual measures for the provision of services and the license to use the platform;
- Art. 6(1)(c) GDPR: compliance with legal, administrative, and tax obligations binding the Controller;
- Art. 6(1)(f) GDPR: legitimate interest of the Controller in fraud prevention, IT security management, and optimization of B2B services.

3. TYPES OF DATA COLLECTED

The following are collected: company name, VAT/Tax identification number, first name and last name of the legal representative/contact person, company email address, telephone number, registered office address (street, city, ZIP code, province, country), billing and payment data (managed securely through third-party provider Stripe), and log files and IP addresses for Backend access.

4. PURPOSE OF THE PROCESSING

The collected data are used to:

- allow registration, access, and use of the **ADPRODEX** platform;
- manage advertising campaigns and the provision of the related promotional products or services;
- manage payments, invoices, and the guarantee deposit;
- send operational service communications and account notifications;
- comply with bookkeeping, legal, and tax obligations;
- prevent illicit activities, computer fraud, and protect the security of the infrastructure.

5. PROCESSING METHODS

Processing is carried out using electronic and telematic tools, with organizational logic strictly related to the indicated purposes. Appropriate technical and organizational measures are adopted (including HTTPS data encryption in transit and access control policies) to ensure the confidentiality, integrity, and availability of personal data.

6. THIRD-PARTY COMMUNICATIONS AND EXTRA-EU TRANSFERS

Data may be communicated to:

- providers of technical, cloud hosting, email, and management services acting as Data Processors (Art. 28 GDPR);
- financial intermediaries and payment management companies (e.g., Stripe);
- tax, accounting, and legal advisors;
- public or judicial authorities in case of specific legal obligations.

Data transfers outside the European Economic Area (EEA) take place exclusively to third countries deemed adequate by the European Commission, or in the presence of Standard Contractual Clauses (SCC), or based on adhesion to the EU-US Data Privacy Framework.

7. RETENTION PERIOD

Data will be stored for the entire duration of the contractual relationship and, following its termination, for a period of 10 years, in order to comply with the retention obligations required by German and European commercial and tax regulations.

8. RIGHTS OF THE DATA SUBJECT

Company contact persons can exercise their rights under Articles 15-22 of the GDPR at any time by writing to: administration@redblu.net. These rights include: access to their data, rectification, erasure (right to be forgotten), restriction of processing, objection to processing, and data portability. Data subjects also have the right to lodge a complaint with the competent supervisory authority (for Bavaria: *Bayerisches Landesamt für Datenschutzaufsicht - BayLDA*, Ansbach, Germany, or the supervisory authority of their country of residence).

9. COOKIES AND TRACKING TOOLS

The platform uses technical, statistical, and profiling cookies. The use of cookies is detailed in the specific Cookie Policy accessible on the website.

10. CHANGES TO THE PRIVACY POLICY

The Controller reserves the right to update this policy at any time to adapt it to legislative or technical developments. Changes will be communicated via email or through notification on the company panel.