

# Privacy & cookies statement Spicy Trip

*This privacy and cookie statement was last amended on August 25, 2020*

Spicy Trip is a 'mingling' platform, where you are able to meet new people. Spicy Trip is an initiative from Spicy Media B.V. (hereinafter: Spicy Media). Through its services, Spicy Media will process privacy sensitive or personal data. Spicy Media values the privacy of its users and observes due care in processing and protecting personal data on our website ([www.spicytrip.com](http://www.spicytrip.com)), our application and through our services.

## The processing of personal data

While using our website or our application you provide us specific types of data, including personal data relating to you. We only collect, store and use personal data that is directly provided by you (for example via our contact form), or personal data of which it is clear that it is being provided to us in order to process it. We will not use your personal data for any other goals, unless you have given us permission to do so or if we are legally obliged or allowed to do so. During the processing we stick to the requirements of the European data protection regulations. This means we:

- **Clearly specify our purposes** before we process personal data, by using this privacy and cookie statement;
- **Limit our collection of personal data** to only the personal data needed for legitimate purposes;
- **First ask for explicit consent** to process your personal data in cases where your consent is required;
- **Take appropriate security measures** to protect your personal data and we demand the same from parties who process personal data on our behalf;
- **Respect your privacy rights** regarding your personal data held by us.

Spicy Media is the party responsible for all data processing. In this privacy and cookie statement, we will explain which personal data we collect and for which purposes. In doing so, a distinction is made between the data we collect from you when you visit our website and the data we obtain from you when you use our application. We recommend that you read it carefully.

## Use of personal data

By using the services of Spicy Media (on the website or via our application) and visiting our website: [www.spicytrip.com](http://www.spicytrip.com) you are providing certain data to us. This could be personal data. We only retain and use the personal data provided directly by you or for which it is clear that it has been supplied to us to be processed. Personal data that is excessive to our purpose for collection won't be collected and all personal data is collected and processed lawfully and fairly.

We use the following personal data for the purposes as mentioned in this privacy and cookie statement:

- Name
- Address
- Contact details
- Payment details
- Telephone number
- E-mail address
- Account information
- Place of residence
- Date of birth
- Cities you wish to visit

- Pictures
- Gender
- Preferences
- Telephone number
- Purchase history
- Chat history
- Any other information you wish to disclose about yourself on your profile
- Name on card
- Curriculum Vitae
- Motivation letter
- Salary indication
- References
- Any other information you enclose with your application
- Information on your use of our website (such as IP-address, cookie ID, website and click behavior and referrer URL);
- Information (such as questions, requests, complaints, opinions, ideas) which you send us when contacting us;

We process your personal data for the following purposes:

- to grant access to the website [www.spicytrip.com](http://www.spicytrip.com).
- to use the different features of our website and services;
- to contact you, in case you requested us to do so;
- to gain insight in the use of our website;
- to create an account;
- to analyze statistics and optimize the website, and to report on and measure the effect of our marketing efforts;
- to improve and evaluate our website and services;
- to keep you up to date about our commercial developments and personalized offers via our newsletter;
- to show you personalized content on our website, that fits your interests;
- to handle job applications;
- to make the internet offer more interesting for you by displaying advertisements that fits your interests.

### **Providing our services**

We can use your personal data for providing our services, based on our contract with you. For this purpose, we use your:

- Name
- Address
- Contact details
- Payment details.

We retain this information until our services has been completed. Certain types of personal data may be retained for a longer period, specifically in order to fulfil our tax obligations or other statutory retention periods.

### **Registration Spicy Trip**

The use of Spicy Trip requires you to register beforehand. In this way we will create an account for you, where you can log in with your e-mail address and the password of your choice. You can also register using your social media account from [Facebook](#) or [Apple](#). If you want to know how these

social media platforms use your personal data, please read the privacy statement of the platform in question.

In order for you to register, we will need your:

- Name
- E-mail address
- Password of your choice

We need this information because of our agreement with you. We will retain this data so that you do not have to re-enter it every time you visit and use Spicy Trip. We keep your personal data until you cancel your account, or a maximum of 5 years after you last logged into your account. We will then assume that you no longer wish to use our services. We retain some data for longer if we are legally obliged to do so (e.g. because of the tax retention obligation).

We will not provide the data linked to your username to third parties, unless it is necessary for the execution of the agreement you concluded with us by creating an account or if this is required by law. In the event of suspicion of fraud or misuse of our website we may hand over personal data to the entitled authorities.

### **Your account**

After registering you can login to your account with your e-mail address and password of your choice to start mingling. You can also register using your social media account from [Facebook](#) or [Apple](#). If you want to know how these social media platforms use your personal data, please read the privacy statement of the platform in question.

When you are logged in you have the possibility to create a profile and change information. Your personal profile data won't be public by default, but you have the opportunity to select the personal data you want to make public. Moreover, you can start mingling with other users through our chat function.

For this purpose, we use your:

- Account information
- Name
- Place of residence
- Date of birth
- Cities you wish to visit
- Pictures
- Gender
- Preferences
- Telephone number
- Purchase history
- Chat history
- Any other information you wish to disclose about yourself

We need this data because of our agreement with you. We keep your personal data until you cancel your account, or a maximum of 5 years after you last logged into your account. We will then assume that you no longer wish to use our services. We retain some data for longer if we are legally obliged to do so (e.g. because of the tax retention obligation).

### **Upgrade membership**

When logged in, you can choose to upgrade your free membership to a paid membership, which gives you more functionalities at your disposal.

For this purpose, we use your:

- E-mail address
- Payment details
- Name on card
- Country or region of residence

We need this data because of our agreement with you. We keep your data for 10 years in accordance with the legal tax retention obligation.

### **Get verified**

When logged in, you can get verified to show your fellow travellers you are really the person the profile belongs to. In order to do so, we use your picture. We need this data because of our agreement with you. We will delete this data directly after you got verified.

### **Notifications**

When you use our services, we can send you notifications via Spicy Trip. For example, you can receive notifications about a new mingle, new messages and new suggestions. Moreover, we can send notifications regarding news about new products and services of Spicy Trip. These notifications will appear on your device. We send you notifications in order for us to perform our agreement with you. You can opt-out of these notifications at any time via your personal account.

### **Apply for a job at Spicy Media**

If you have responded to one of our vacancies or submitted an open application, we will process your personal data. We will do so in order to process your application and in preparation for the possible conclusion of an employment contract (performance of the contract).

For this purpose, we use your:

- Name
- Address details
- Contact details (e-mail address and telephone number)
- Curriculum Vitae
- Motivation letter
- Salary indication
- References
- Any other information you enclose with your application

We will retain your application details for a maximum of 6 weeks after the position has been filled. We keep this information so that we can contact you in the event that the position becomes vacant again within the probationary period. If we are unable to offer you a job at this time, we may - with your permission - keep your application details for a further year. You can withdraw your consent at any time by sending us an email. If you come to work for us, we will save your application data in the personnel file. This file will be kept for as long as necessary and with regard to the application data for a maximum of 2 years after taking up employment.

### **Contact**

You can contact us by sending us an e-mail or calling us. When logged in, you can also use the contact form to ask for support.

For this purpose, we use your:

- E-mail address
- Telephone number
- Any information you enter yourself as content of your message
- Any information discussed during the telephone conversation

We use this information in order to be able to handle your request to contact you properly and to execute the agreement with you to this end. If you contact us, the data you provide will be retained for as long as is necessary depending on the nature of the form or the content of your email, to fully answer and correctly handle your request.

### **Newsletter**

We have a newsletter to inform those interested in our services, to which you can subscribe on our website. This newsletter will be send monthly.

For this purpose, we use your:

- E-mail address

Your e-mail address will be added to the list of subscribers only with your explicit consent. We will retain your personal data until you unsubscribe from the newsletter. Each newsletter contains a link with which you can unsubscribe from our newsletter at any time.

### **Our application**

You can also use our services via our application. In order to do so, you need to download our application first. You can do this via the App Store or via Google Play. We have no influence on which personal data is processed by the provider ([Apple](#) and [Google](#)) and for what purpose they use your information. We recommend that you read the relevant privacy statement of the provider in question.

### **Confidentiality & providing data to third parties**

Spicy Media only shares your data with third parties when this is allowed by current legislation. It may happen that we provide your personal information to third parties, because:

- we have engaged them to process certain data;
- it is necessary to carry out the agreement with you;
- you give permission for this;
- we have a legitimate interest in this;
- we are legally obliged to do so (e.g. if the police demand this in case of a suspicion of a crime).

The parties that process personal data in our or your assignment are:

- IT suppliers and service providers
- Cookie service providers
- Payment service providers

In order to provide this service, Spicy Media may provide your personal data to parties established outside the European Economic Area (EEA). Spicy Media will only do this if there is an adequate level of protection for the processing of personal data. This means, for example, that we use a model agreement from the European Commission or make agreements about the handling of personal data.

### **Cookies**

We make use of cookies on our website. Cookies are small text files that can be automatically stored on, or read out from the device (including a PC, tablet, or smartphone) of the website visitor, while visiting a website. This is done through the web browser on the device. The information that can be

transmitted by a cookie, over the use of our website, can be transferred to the own secured servers of Spicy Media or to the servers of a third party. The information stored in the cookies can be returned to our servers or those of the relevant third parties if you decide to visit our website again.

We, as well as third parties, use cookies on our website for the following purposes:

- *Technical and functional cookies*: to offer the functionalities on this website and to protect the website. These cookies ensure the functioning of specific features of our website and allow your user preferences to be remembered. So, for example cookies can be used to correctly display fonts, to remember your user session on the web server so you can view the website, or to remember a search term used to search on the website or a chosen filter.
- *Analytics cookies*: to generate overall statistics and gain insight in the use of our website by the public in order to optimize our website and services;
- *Targeting/advertising cookies*: to make the internet offer more interesting for you by displaying advertisements that fit your interests. We use these services in order to improve the relevance of online advertising for you, and we can gain insight in the effectiveness of our advertising campaigns. By our use of these cookies, a unique cookie ID is given to you as a website visitor, so that you do not see the same advertisement twice. We only place these so-called tracking cookies with your consent;
- *Social media cookies*: to offer you the possibility to share information on our web pages via the different Social Media channels.

When you visit our website for the first time, we display a notification explaining cookies. We will ask your consent for the use of analytics, targeting/advertisement and social media cookies.

We use the following cookies:

Provider, location, guarantees and privacy statement	Name	Kind of cookie	Purpose	Retention period
<a href="#">Google LLC.</a> , United States. Google is <a href="#">Privacy Shield-certified</a> .	GA Audiences	Targeting/ advertising	Google AdWords uses GA Audiences to re-engage website visitors who convert to customers based on the visitor's online behavior on different websites.	Session
<a href="#">Google LLC.</a> , United States. Google is <a href="#">Privacy Shield-certified</a> .	Google Analytics	Analytics	<p>Google Analytics:</p> <ul style="list-style-type: none"> <li>• Registers a unique ID to generate statistical data about the use of the website;</li> <li>• Measures the (return) visits to the website;</li> <li>• Distinguishes between different types of users.</li> </ul> <p>Google obtains a part of your IP address. We have not allowed Google to use your data for other Google services. However, Google may provide information to third parties if Google is legally required to do so, or to the extent that such third parties process the information on Google's behalf. We do not have influence on this.</p>	Two years + session

<a href="#">Google LLC</a> , United States. Google is <a href="#">Privacy Shield-certified</a> .	DoubleClick	Targeting/ advertising	DoubleClick improves ads based on what is relevant to a user, reports on campaign performance, and prevents website visitors from seeing ads that have already been seen.	1 year + session
<a href="#">Facebook Inc.</a> , United States. Facebook is <a href="#">Privacy Shield-certified</a> .	Facebook Social Graph	Social media	Enables the website to pull Facebook elements, such as profile images and public Facebook posts	

We have concluded agreements with these companies about the use of cookies. However, we do not have full control over what they do with the cookies themselves. Please read their privacy statements.

### Disabling of cookies

You can prevent the placement of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling some functionality and certain features of this website. Therefore, it is recommended not to disable cookies.

### Removal of cookies

Most cookies have an expiration date. This means that they will automatically expire after a certain period and no longer register any data concerning your visit of the website. Another option is to remove the cookies manually before the expiration date. In order to do this, consult the instruction manual of your browser.

### Social media buttons

On our website we use social media buttons, which redirect you to the social media platforms. This gives you the option to follow us and share content within the network. You will also see advertisements on your social media page. The buttons are active because of bits of code that come from the social media networks. If you want to know what the social media platforms do with your personal data, please read the relevant privacy statement:

- [Facebook \(privacy policy\)](#)
- [Twitter \(privacy policy\)](#)
- [YouTube \(privacy policy\)](#)
- [Instagram \(privacy policy\)](#)

These social media companies are based in the United States. They adhere to the [Privacy Shield](#) principles, as they are affiliated with the U.S. Department of Commerce's Privacy Shield program. The European Court of Justice declared the Privacy Shield invalid on the 16<sup>th</sup> of July 2020. This means that there is no adequate level of protection for the processing of personal data in case personal data will be transferred to the United States. The practical consequences of the decision of the European Court of Justice have yet to become clear. We are currently investigating the effects of this decision that we as an organization may encounter and the possibilities we have. As soon as more is clear about this, we will adjust our working method and privacy and cookie statement accordingly.

### Security

We take security measures to reduce misuse of and unauthorized access to personal data. Our employees are instructed to take proper care when handling your personal data, SSL connections are

in place to safeguard encrypted transportation of personal data to our web servers, we regularly update our software with the latest security patches and we perform tests to make sure our security measures are functioning as they should.

### Third party websites

This statement is not applicable to third party websites connected to this website through links. We cannot guarantee that these third parties will handle your personal data in a secure and careful manner. We recommend you read these websites' privacy statements before making use of these websites.

### Your privacy rights

You can always contact us if you have any questions regarding our privacy and cookie statement. You have the following rights:

- Right of **access**: you have the right to see what kind of personal data we process about you;
- Right of **rectification**: you have the right to rectify any personal data we have processed about you, if this information is (partially) wrong;
- Right to **complain**: you have the right to file a complaint against the processing of your personal data by us, or against direct marketing;
- Right to be **forgotten**: you can file a request to remove any of your personal data that we processed;
- Right to **data portability**: if technically possible, you have the right to ask us to transfer your personal data to a third party;
- Right to **restriction** of processing: you can file a request with us to (temporarily) restrict the processing of your personal data;
- Right to **revoke your consent**, when we process your data with your consent.

You should send your request to [admin@spicytrip.com](mailto:admin@spicytrip.com). To prevent abuse, we may ask you to provide proper proof of your identity. If you want to inspect personal data linked to a cookie, you should include a copy of the relevant cookie with your request, which you can find in your browser settings.

We will usually comply with your request within 30 days. We may, however, extend this term if the request is complex or tied to a specific right. You will be notified about a possible extension of the term.

### Changes to this privacy and cookie statement

We reserve the right to modify this statement. We recommend that you review this statement regularly, so that you remain informed of any changes.

### National supervisory authority

Of course, we also gladly help you if you have any complaints about the processing of your personal data. Based on privacy legislation, you have the right to lodge a complaint with the national supervisory authority responsible for protection of personal data against our processing of your personal data. For the Netherlands, this is the [Autoriteit Persoonsgegevens](https://autoriteitpersoonsgegevens.nl). In order to do so, you can contact the Autoriteit Persoonsgegevens.

### Contact us

Spicy Media B.V.

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