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## COMPETITION - PRIVACY NOTICE

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## 1. INTRODUCTION

We are committed to protecting and respecting your privacy. This Privacy Notice explains how Ledvance, collects, uses, and protects your personal data in connection with our Instagram Installer Photo Contest (the "Contest"). It also outlines your rights under the General Data Protection Regulation (GDPR).

By entering the Contest, you agree to the collection and use of your personal data as described in this Privacy Notice.

## 2. DATA CONTROLLER

Ledvance is the data controller responsible for the personal data collected during the Contest.

## 3. WHAT DATA WE COLLECT

We may collect and process the following personal data from you:

- **Contact Information:** Your name, Instagram handle, email address, and any other contact details you provide.
- **Content:** Any photos, videos, captions, and comments you submit as part of your entry.
- **Technical Information:** Data related to your interactions with our Instagram page, such as your IP address and browser type (if applicable).
- **Communication Data:** Any correspondence between you and us related to the Contest.

**3.1 Special Category Data:** We do not collect or process any special category data as defined under applicable data protection laws. This includes, but is not limited to, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health information, or data concerning a person's sex life or sexual orientation. If there is ever a need to process such data, we will ensure it is done with explicit consent and in compliance with all relevant legal requirements.

## 4. HOW WE USE YOUR DATA

We use your personal data for the following purposes:

- **Administering the Contest:** To manage your participation, select and notify winners, and deliver prizes.



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- **Marketing and Promotions:** With your consent, to feature your entry on our Instagram page and other marketing channels.
- **Legal Compliance:** To comply with any legal obligations, such as maintaining records of prize winners for tax/ financial records purposes.

## 5. LEGAL BASIS FOR PROCESSING

We process your personal data based on the following legal grounds:

- **Consent:** By entering the Contest, you give us your explicit consent to process your personal data for the purposes outlined above.
- **Legitimate Interests:** We may process your data where it is in our legitimate interests to do so, such as for the promotion of our brand or the management of the Contest.

## 6. DATA SHARING

We will not sell your personal data to third parties. However, we may share your data with:

- **Service Providers:** Third-party companies that assist us in administering the Contest, such as delivery companies for prizes.
- **Social Media Platforms:** Instagram, as necessary to operate the Contest.
- **Legal Authorities:** If required by law or to protect our rights and property.

## 7. INTERNATIONAL DATA TRANSFERS

In this section, we provide information about the circumstances in which your personal data may be transferred and stored in countries outside the United Kingdom (UK).

We may share personal information to third parties outside of the UK. Any personal information transferred will only be processed on our instruction and we ensure that information security at the highest standard would be used to protect any personal information as required by the Data Protection laws.

Where personal data is transferred outside of the UK to a country without an adequacy decision, we will ensure appropriate safeguards are in place prior to the transfer. These could include:

- Standard Contractual Clauses with the UK Addendum
- International Data Transfer Agreement
- Binding Corporate Rules
- An exception as defined in Article 49 of the EU GDPR. For more information about transfers and safeguarding measures, please contact us using the information in section 14.
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## 8. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

We will retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, including any legal or reporting requirements. Typically, this means retaining your data for the duration of the Contest and for a reasonable period afterward. If you would like to find out how long your information is being retained, please see "additional information", section 14 of this notice.

## 9. CHILDREN'S INFORMATION

We do not knowingly collect information on children. If we have collected personal information on a child, please contact us immediately using the details in section 14, so we can remove this information without any undue delay.

## 10. AUTOMATED DECISION MAKING

Your personal data is not used in any automated decision making (a decision made solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain conditions about an individual).

## 11. YOUR RIGHTS

In this Section, we have summarised the rights that you have under General Data Protection Regulation. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under General Data Protection Regulation are:

- Right to Object
- Right of Access
- Right to be informed
- Right to Rectification
- Right to Erasure
- Right to Restrict Processing
- Right to Data Portability
- The right to object

You can exercise this right if

- Processing relies on legitimate interest
- Processing is for scientific or historical research
- Processing includes automated decision making and profiling
- Processing is for direct marketing purposes



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- The right of access
  - You or any third party acting on your behalf with your authority may request a copy of the personal data we hold about you without charge.
  - We will ask to verify your identity or request evidence from the third party that they are acting on your behalf before releasing any personal data we hold about you.
- The right to be informed
- We are required, to provide clear and transparent information to you about how we process your personal data. This privacy notice addresses this right.
- The right of rectification
  - If you believe the personal data, we hold about you is incorrect or incomplete you have the right to correct this and you may exercise this right along with the right to restrict processing until these corrections are made.
- The right to erasure
  - If there is no legal basis or legitimate reason for processing your personal data, you may request that we erase it.
- The right to restrict processing
  - You may ask us to restrict the processing of your personal data. This means we will still hold it but not process it. This is a conditional right which may only be exercised when:
    - Processing is unlawful
    - We no longer need the personal data, but it is required for a legal process
    - You have exercised your right to object to processing and require processing to be halted while a decision on the request to object is made.
    - If you are exercising your right to rectification
- The right to data portability
  - You can request that your personal data is transferred to another controller or processor in a machine-readable format if:
    - Processing is based on consent
    - Processing is by automated means (i.e. not paper based)
    - Processing is necessary for the fulfilment of a contractual obligation

If you have any question about these rights, please see "additional information", section 14 of this notice.

## 12. SECURITY OF YOUR PERSONAL INFORMATION

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.



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We have in place procedures to deal with any suspected personal data breach. We will notify the Information Commissioner's Office (ICO) of a breach (or suspected breach) where we are required to do so. We will also contact you directly if the breach (or suspected breach) results in a high risk to your privacy.

## 13. CHANGES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time. We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

## 14. ADDITIONAL INFORMATION

Your trust is important to us. That is why we are always available to talk with you and answer any questions concerning how your data is processed. If you have any questions that could not be answered by this privacy notice or if you wish to receive more in-depth information about any topic within it, please contact us via email on [privacy@ledvance.com](mailto:privacy@ledvance.com)

## 15. RIGHT TO COMPLAINT

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact us via email on: [privacy@ledvance.com](mailto:privacy@ledvance.com)

Alternatively, you can contact us:

By Post: Ledvance Benelux, Postbus 115, 2900 AC Capelle aan den IJssel, Nederland

Alternatively, you can make a complaint to the Information Commissioner's Office:

By Post:

NL: Autoriteit Persoonsgegevens, Postbus 93374, 2509 AJ Den Haag

BE: Gegevensbeschermingsautoriteit, Drukpersstraat 35, 1000 Brussel,

IE: Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland

By Website: [www.benelux.ledvance.com](http://www.benelux.ledvance.com)



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By Email: [benelux@ledvance.com](mailto:benelux@ledvance.com)

By Phone: +31 10 750 14 14

## 16. CONTACT US

If you have any questions or concerns about this Privacy Notice or our data practices, please contact us at:

LEDVANCE Benelux B.V.  
Postbus 115  
2900 AC CAPELLE AAN DEN IJSSEL  
NEDERLAND

[benelux@ledvance.com](mailto:benelux@ledvance.com)  
[www.benelux.ledvance.com](http://www.benelux.ledvance.com)  
+31 10 750 14 14