

# Privacy Policy for Playalong App

Last updated 9 January 2023

## 1. Introduction

Nordisk Banijay AS (“**Nordisk**”) is one of the longest running production companies in Norway that mainly produces entertainment, reality and comedy shows, as well as supplier of digital services such as this App that allows viewers of live broadcasting shows to play along with the show.

This Privacy Policy describes how the broadcasting company as the Customer (controller with regard to privacy laws such as GDPR), and Nordisk as a processor of Customer, collects, uses, share or in any other way process your personal data when you use the App to cast your vote. This Privacy Policy describes:

- Which personal data Nordisk process, why we collect the data and how we use it
- To whom we share your personal data
- Security routines
- Your Privacy rights

If you have any questions about how Nordisk process personal data, please get in touch with us at: [privacy@nordiskbanijay.no](mailto:privacy@nordiskbanijay.no).

## 2. Definitions

**User Terms:** The End User Agreement which applies between you as an End User and Nordisk for the use of the App.

**Voting App or the App:** The mobile Playalong application with its functions for voting for contestants on the Show, which is available as an app for Android and iOS.

**Show:** The live broadcasting show in which viewers can play along to with the App.

**Nordisk or “we”/“us”:** Nordisk Banijay AS with business registration number 993 045 357 and address Hammersborggata 9, 0181 Oslo.

**Production company:** The supplier of the production you are using the App in relation to. Such company can be either Nordisk, other production companies in Norway or a company in the Banijay group.

**Customer:** The broadcasting company who has entered into an agreement with Nordisk regarding use of the Voting App.

**End User/You:** You, the physical person who uses the App.

**GDPR:** The EU's General Data Protection Regulation. (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC) which came into force in the EU on 25<sup>th</sup> of May 2018.

## 3. GDPR roles - controller or processor

The Customer is responsible for the production of Show and is considered the controller with regards to GDPR for the personal data processed by your use of the App. Nordisk is considered a data processor and have entered into a data processing agreement with Customer that govern how Nordisk can process the personal data that you enter into the App. If Nordisk has your consent to process personal data for different processing activities, Nordisk will be the controller for those processing activities. Nordisk is for instance a controller with regard to GDPR if you contact us and requests support, or if you direct any questions regarding the use of the App to us, or if Nordisk is the broadcasting company that will be responsible for the production of the Show.

## 4. Personal data Nordisk process

Nordisk must as a data processor, process and collect personal data in order to provide the App and enable End Users to vote for contestants in Show. Nordisk will process the following personal data in order to provide the App:

- **Information provided when registering in the App**

This includes your name and contact information such as email and phone number.

- **Information about how you use and engage in the App:**

This includes information generated from how the App is used, for example how you navigate in the App.

- **Information related to how you vote:**

This includes information about the contestant you chose to cast a vote to.

## 5. Legal basis for processing personal data

Nordisk ensures that there is a legal basis for all processing of personal data. Nordisk will process personal data from and in the App to fulfil the contract we have with Customer, including the data processing agreement in place, and to fulfil the contract to which you as an End User is part of by accepting the User Terms. Nordisk uses legitimate interest as legal basis for security purposes (data may be processed to prevent fraud, breach of the User Terms or other illegal activities) and analysing purposes (data generated through the App will be anonymized before we analyse how the App is used).

## 6. Transfer of Personal Data

Nordisk does not disclose or share personal data with others unless we have a legal basis or obligation to do so. The legal basis for such transfer is for instance the User Terms or the Data Processing Agreement in place between Nordisk as a processor for Customer as the controller.

### 6.1 Transfer of personal data with sub-suppliers

Nordisk use data processors to process personal data in the App. When the processing is performed by one of our sub-processors, the processing is performed in accordance with a Data Processing Agreement which sets out requirements to the sub-processor to comply with applicable privacy law, including strict requirements to have security measures in place to secure the personal data. The sub-processor is also instructed to only process personal data within the EU.

All Personal Data processed in the App is stored and processed by our data processors as stated here:

Data processor	Purpose	Website
<b>Adappt Ltd,</b> Hounslow Business Park Unit 6, Alice Way, Hounslow, Middlesex, TW3 3UD, England.	Adappt provides technical support for the App. Nordisk have entered into a data processing agreement with Adappt in line with GDPR article 28.  Adappt can process personal data in the UK. The UK is approved by the European commission as a country where the level of protection for personal data is comparable to those of EU law.	<a href="https://adappt.co.uk/">https://adappt.co.uk/</a>
Amazon Web Services ("AWS"), EMEA SARL, 38 avenue John F. Kennedy, L-1855 Luxembourg.	Nordisk uses Amazon Web Services (AWS), and AWS Data Processing Agreement is part of the terms of agreement that apply for the use of the services.  All data in and from the App, including personal data, is stored and processed on AWS cloud service. Storage of personal data is limited to EU/EEA.	<a href="https://aws.amazon.com/">https://aws.amazon.com/</a>

## 7. Protection of your personal data

Nordisk focuses on information security in the App. Nordisk has therefore implemented several security measures to secure that your personal data is protected. Access to personal data is limited to personnel that are responsible for the App, which is limited to a few trusted employees. The Employees with access to the personal data have signed a non-disclosure agreement and/or have such a duty of confidentiality under their employment contract.

Nordisk requires that our suppliers collect and process your personal data in a safe matter, for instance is one of our requirements that data is encrypted.

## 8. How long do we retain your data

Nordisk stores the personal data only for the period necessary pursuant to the purpose the data is collected. Personal data you provide in the App will be deleted after the User Terms are fulfilled. This means that personal data is deleted after the agreement has ended and all obligations arising from the contractual relationship on our part have been fulfilled.

Nordisk will also delete personal data if you request it unless Nordisk have a legal obligation or another legal basis for retaining the personal data for a longer period.

## 9. Your rights when we process personal data

You have a right to access the personal data Nordisk process and have the right to request that we correct any inaccuracies regarding your personal data. You also have the right to request that we delete personal data if the purpose and legal basis for the processing activity no longer applies.

If we process your personal data based on your consent, you can withdraw your consent at any time.

The Norwegian Data Protection Authority is the supervisory authority for the processing of personal data. If you consider that Nordisk's processing of personal data is not in accordance with the Personal Data Act, you can complain to the Norwegian Data Protection Authority. You can find more information about how you can get in touch with the Norwegian Data Protection Authority on its website [www.datatilsynet.no](http://www.datatilsynet.no).

We hope you get in touch with us if you have a complaint or want to exercise your rights:

You can contact us via [privacy@nordiskbanijay.no](mailto:privacy@nordiskbanijay.no).