

Favcy User Policy

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Favcy User Policy Intended Audience

The GDPR are regulations towards Data Protection. As such Enterprise such as ours are mandated only to provide such a charter for EU citizens but we at Favcy believe that Data Privacy is a fundamental Right of the end user and therefore follow the same set of guidelines across our entire platform, without taking in the limitation of geographical boundaries.

We need your consent

At Favcy, we are committed to providing you with a transparent system.

Favcy is a B2B2C Engagement Data Platform and therefore houses some of your sensitive data that you EXPLICITLY have given permission for. You may have logged in or maybe are about to log in to Favcy's Engagement Data Platform - directly or through one of our Partner Enterprises that have leased our systems. In either case, this document holds true.

Who are we - the identity of the organisation processing data ?

1. Favcy is a Brand Registered with Experience Global Mobile Technologies Private Limited and is registered in New Delhi, India
2. Favcy's main line of operation is to provide a plug and play, Engagement Data Platform (EDP) to various enterprises that seek to improve Engagement and care for their End Customers. If you are seeing this, you are either accessing Favcy's System from Favcy.com or are accessing Favcy's EDP from an Enterprise that has leased Favcy's System or are accessing a Product that utilises Favcy's EDP

Why do we process your Data - the purposes for which the data is being processed?

- a. Favcy processes your data to provide you various services including Personalisation and Redemption.
- b. Personalisation Services improve your Experience with the Enterprise, where our Engagement Data Platform is installed.
 - These Improvements could mean the following
 - You are able to see Articles that are more apt to your browsing habits
 - You are able to see Offers that are more apt to your Demographic
 - You are able to Get the Right information from the Enterprise at the Right Time
- c. Redemption Services - Favcy's Engagement Data Platform also issues Enterprise Tokens for Engagements. These Tokens are non Currency token and are like Goodwill and Gratitude Tokens issued by the Enterprise and can convert to various Offers that Enterprise that has leased the Engagement Data Platform from Favcy is willing to Offer against these Tokens or to Offers that other Merchants are willing to provide against those tokens.

What type of Data do we process?

- a. Favcy will process all Data post seeking your permission
- b. We post your consent take your Email Address and Phone Number.
- c. The Phone number acts like your Identification Number in the Favcy's Ecosystem.
- d. Apart from this, for the Redemption Services, all your activities are tokenised.
- e. All these Activities - including but not limited to - Viewing a Video, Reading Article, Making a Purchase with the Enterprise etc can be viewed on Favcy.com in the User Logged In section.
- f. Your list of Activities are viewable in the Favcy.com, post login User Panel.

Data is your Right. Know your Rights

You have the right to:

1. **Information** about the processing of your personal data;
2. **Obtain and access to** the personal data held about you;
 - Can be accessed at Favcy.com or can be accessed from the Product that is utilising Favcy's Engagement Data Platform, post login User Panel
 - This right is not absolute: the use of the right to access your personal data should not affect the rights and freedoms of others, including trade secrets or intellectual property.***
3. Ask for incorrect, inaccurate or incomplete personal data to be **corrected**;
 - Can be initiated from Favcy.com or or can be accessed from the Product that is utilising Favcy's Engagement Data Platform, post login User Panel
 - If you believe that your personal data might be incorrect, incomplete or inaccurate you can ask us to correct your data. We typically will resolve it in one month or will justify in writing why the request cannot be accepted.
4. Request that personal **data be erased** when it's no longer needed or if processing it is unlawful;
 - Can be initiated from Favcy.com or can be accessed from the Product that is utilising Favcy's Engagement Data Platform, post login User Panel
 - Yes, you can ask for your personal data to be deleted when, for example, the data that we hold on you is no longer needed or when your data has been used unlawfully.
 - Personal data provided when you were a child can be deleted at any time.
 - This right also applies **online** and is often referred to as the '**right to be forgotten**'. In specific circumstances, you may ask us to delete the data.

5. **Object** to the processing of your personal data for marketing purposes or on grounds relating to your particular situation;
 - Can be initiated from Favcy.com or can be accessed from the Product that is utilising Favcy's Engagement Data Platform, post login User Panel
6. Request the **restriction** of the processing of your personal data in specific cases;
 - Can be achieved by de-selecting Enterprises from Do Not Share my Information Panel on the post Login User Panel
7. Receive your personal data in a machine-readable format and send it to another controller (**'data portability'**);
 - Can be Downloaded from the Favcy.com, post login User Panel
8. Request that decisions based on **automated processing** concerning you or significantly affecting you and based on your personal data are made by natural persons, not only by computers. You also have the right in this case to express your point of view and to contest the decision.
 - Favcy utilised both Natural People and Computer for Automated Processing of Data. You have the first Right to Refusal of Data, which can be initiated from the Favcy.com, post login User Panel.

In case of any clarification -- please reach out to our

Data Protection Officer
Pranav Chaturvedi
pc@favcy.in

Your Personal Data is our Priority

We respect your Data and will fulfill all obligations required or mandated by Law.

You must know the following

1. When you provide your personal data, the **name** of the company or organisation that is processing your data
 - Favcy is a Trademark of Experience Global Mobile Technologies Private Limited
 - Our Data Processing Officer is Pranav Chaturvedi and can be reached at pc@favcy.in

2. The **purposes** for which the company/organisation will use your data;
 - Favcy utilises your data to improve various services provided by the Enterprise that is utilising our Engagement Data Platform.
 - These Services include Personalisation and Redemption Services.
 - Personalisation Services improve your Experience with the Enterprise, where our Engagement Data Platform is installed.
 - These Improvements could mean the following
 - You are able to see Articles that are more apt to your browsing habits
 - You are able to see Offers that are more apt to your Demographic
 - You are able to Get the Right information from the Enterprise at the Right Time
 - Redemption Services - Favcy's Engagement Data Platform also issues Enterprise Tokens for Engagements. These Tokens are non Currency token and are like Goodwill and Gratitude Tokens issued by the Enterprise and can convert to various Offers that Enterprise that has leased the Engagement Data Platform from Favcy is willing to Offer against these Tokens or to Offers that other Merchants are willing to provide against those tokens.

3. The categories of personal data concerned;
 - Favcy **does not ask for any of the following data on your:**
 - Racial or Ethnic Origin
 - Political Opinion
 - Philosophical Beliefs

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- Trade Union Memberships
 - Genetic Data
 - Biometric Data for uniquely identifying you
 - Data concerning your Health
 - Data on your Sex Life
 - Data on your Sexual Orientation.
- 4. The legal basis for processing your personal data;
 - All Data that is required and Mandated by Laws will be processed
- 5. The **length of time** for which your data will be stored;
 - Favcy does not put an expiry on the Data that is stored.
 - You retain the option of deciding whether to store data on Favcy's Cloud by visiting favcy.com, post login User Panel.
- 6. **Other companies/organisations** that will receive your data;
 - Favcy provides a Leased Service to various Enterprises, who have chosen Favcy to improve your Experience with them.
 - You can visit Favcy.com, post login User Panel to see the Enterprises where you have registered yourself and who are likely to receive your data.
- 7. Whether data will be **transferred outside the EU**;
 - As per EU laws, we clearly state that Favcy is a Trademark of Experience Global Mobile Technologies Private Limited, which is based outside the EU. EGMTPL is based in New Delhi, India and it's Registered Head Office is at
HS 13, 2nd Floor Kailash Colony
Main Commercial Market
New Delhi - 110048
- 8. Your **basic rights** in the field of data protection (for example, the right to access and transfer data or have it removed);
 - Please visit **Data is your Right** section for more details.
- 9. The **right to lodge a complaint** with a [Data Protection Authority](#)(DPA);
 - If you feel we are violating any of your Data Right, please write to our Data Protection Officer at
 - **Data Protection Officer**
Pranav Chaturvedi
pc@favcy.in
 - If you are not assured within one month, you have the right in EU to approach a Data Protection Authority
 - DPAs are independent public authorities that monitor and supervise, through investigative and corrective powers, the application of the data protection law.

They provide expert advice on data protection issues and handle complaints that may have breached the law.

- A List of DPA's can be accessed here :
http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

10. The **right to withdraw your consent** at any time;

- The possibility to withdraw consent (for example by sending an email to withdraw consent), is completely in your control
 - All Data is your right and can be accessed from Favcy.com, post login User Panel
 - If you would like to Withdraw Consent Or Delete your Data from our Servers and would not like to utilise any of our services of Personalisation and Redemption directly or through the Enterprise where Favcy's Engagement Data Platform is installed then please undertake the following steps
 - Mail to our Data Officer - Pranav Chaturvedi - pc@favcy.in

11. The existence of **automated decision-making** and the logic involved, including the consequences thereof.

- Profiling is done when your personal aspects are being evaluated in order to make predictions about you, even if no decision is taken. At Favcy, we do undertake these profiling decisions. But our Decision Making for the Enterprise that has leased us is not reliant solely on Automated Means. The data protection law establishes that you have the **right not to be subject to a decision based solely on automated means**
- Decisions based solely on automated means are also allowed where:
 - the decision is necessary that is to say, there must be no other way to achieve the same goal to enter or perform a contract with you;
 - you have given your explicit consent.
 - You retain your complete Right to inform us with your Point of View and can contact our
 - **Data Protection Officer**
Pranav Chaturvedi
pc@favcy.in

Data on Children

At Favcy we understand that additional protection is required for safeguarding Personal Data of Children. We generally do not encourage any enterprise to access any information on Children. But in extreme cases, if a child's data is required, we will require **the consent of the parent or guardian**.

For the purpose of GDPR compliance, the age threshold for obtaining parental consent is established by each EU Member State and can be between 13 and 16 years. Check with your [National Data Protection Authority](#).

We request Date of Birth in our Profile Section and may additionally take reasonable efforts, taking into consideration available technology, to check that the consent given is truly in line with the law. This may involve implementing age-verification measures such as asking a question that an average child would not be able to answer or requesting that the minor provides his parents' email to enable written consent.

Engagement Data Platform used by your Employer

Favcy's Engagement Data Platform may also be used by your Employer to improve Engagement Levels within the Organisation.

In that case, the employer-employee situation is generally considered as an imbalanced relationship in which the employer wields more power than the employee. Since consent has to be freely given, and in light of the imbalanced relationship, your employer in most cases can't rely on your consent to use your data.

There might be situations in which processing of an employee's personal data based on the employee's consent is lawful, especially if it's in the interest of the employee. For example, if a company grants benefits to the employee or their family members (e.g. discounts on the company's services), processing of the employee's personal data is allowed and lawful, if informed prior consent was given.

Rarest of Rare Case -- Data Breach

A personal data breach occurs when there's a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data processed. If this happens, we will immediately notify the supervisory authority without undue delay. If the personal data breach is likely to result in a high risk to your rights and freedoms and the risk hasn't been mitigated, then you, as an individual, will also be informed.