

Social Media Privacy Notice

LinkedIn

Effective as of 25.05.2018

Last update: 29.05.2026

This Privacy Notice describes how we collect, use, process, and disclose your information, including personal information, in conjunction with your access, use and interaction with the GiftCard Social Media Accounts.

When this policy mentions “we,” “us,” or “our,” it refers to the joint controllers, maintaining the GiftCard Social Media Account (the “**Data Controller**”), in this case iCard AD, company number 175325806, Registered office at Business Park Varna B1, Varna city, 9009, Republic of Bulgaria.

We give utmost importance to the protection of personal data of our customers. In the following Privacy Notice, we shall provide you with the information required under art. 13 and 14 of GDPR.

We use our Social Media Accounts in LinkedIn to manage and promote our business and to better understand how you use our content, products and services. As the operator of the GiftCard Social Media Account, we are considered Joint Controllers with LinkedIn for certain data processing activities as further specified below in Section 1.3.

1. WHAT INFORMATION WE COLLECT

You are informed that there are three general categories of information that is collected from you differentiated on grounds as defined by the Regulation 2016/679 and other applicable data protection national laws.

1.1 Information That We Collect When you interact with our Social Media Account.

This information is necessary for adequate communication with you in order to satisfy our legitimate interests and in order to comply with the Terms and Conditions of any promotional events, which we may initiate. Without it, we may not be able to interact with you effectively on our Social Media account or enable your participation in our promotional campaigns.

- **Account Information.** When you interact with our Social Media Accounts, we may collect data included in your Social Media Account, such as:
 - First name and surname and/or nickname
 - Date of birth
 - Place of birth
 - Email address
 - Registered address
 - Mobile telephone number
 - Data joined
 - Account based in
 - Other public information - We only access data that you have chosen to make visible or accessible to us through your interaction with our social media pages.

- **Log data and device information.** We may automatically collect log data and device information when you access and interact with our Social Media Accounts. That information includes, among other things: details about how you've used the Social Media content (including if you clicked on links to third party applications/posts/content), IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash data, cookie data, and the pages you've viewed or engaged with before or after using the iCard Platform. We collect this information in relation to our legal obligation to provide you with secure methods of controlling your financial assets and your personal data.
- **Participant information** – we collect Personal Data you provide, for example feedback or support requests towards us. We collect such information for our legitimate interests. Particular information may include:
 - **Information about mentions/tags and other similar.**
 - **Information about content of your posts/mentions or other similar opinions, posted on our Social Media Accounts/Walls and other similar public forums.**

1.2 Information That We Collect With Your Consent

You may choose to provide us with additional personal information in order to obtain a better user experience when interacting with our Social Media Services. This additional information will be processed based on your consent, only for the abovementioned purposes. Where the processing is based on consent, you have the right to opt-out from processing your personal information for those purposes by withdrawing your consent at any time and free of charge

1.3 Statistical Data We Collect When you Engage with Our Content. Joint Controllership.

When you engage with our Social Media Accounts, we may collect information, including personal information, about the services you use and how you use them. This information is necessary given our legitimate interest in being able to provide and improve the functionalities of our Social Media Account.

As the operator of the GiftCard Social Media Account we act as a Joint Controller with LinkedIn for the purpose of receiving statistical data (so called "Page Insights" Such data is made available to us in an aggregated and/or anonymized form. We use this data for our legitimate interests in order to manage and promote our business and to better understand how you use our content.

To this end, we collect the following information:

- **Usage Information.** We collect information about your interactions with GiftCard Social Media Accounts such as your usage of any Apps or Functionalities, and other interactions with our Social Media Accounts. The legitimate interests that we pursue with this processing is collection of usage reports and other statistical information, which helps us improve our social media presence.
- **Cookies and Similar Technologies.** We use cookies and other similar technologies, such as web beacons, pixels, and mobile identifiers. We may also allow our business partners to use these tracking technologies on our Social Media Accounts, or engage others to track your behaviour on our behalf. You may disable the usage of cookies through your browser settings, through a "Do Not Track" signal in the HTTP header from your browser or mobile application.

When visiting our Social Media Account, your personal data is processed by both Joint Controllers. We have concluded an agreement with LinkedIn Ireland Unlimited Company on joint data protection controllership (Page Insights Joint Controller Addendum which can be found here <https://www.linkedin.com/legal//page-joint-controller-addendum>). With this agreement, LinkedIn acknowledges its joint responsibility with regard to so-called Insights data and assumes essential data protection obligations to inform data subjects, to ensure data security or to report data protection violations. For any other processing of personal data in connection with our Social Media Account or the content associated with it for which there is no joint determination of the purposes and means, LinkedIn and iCard AD remain separate and independent controllers.

Further information on how LinkedIn Ireland Unlimited Company processes Personal Data, including the legal basis LinkedIn relies on and the ways to exercise Data Subject rights against LinkedIn, can be found in LinkedIn Ireland Unlimited Company's Privacy Policy at https://www.linkedin.com/legal/privacy-policy?trk=content_footer-privacy-policy

2. HOW WE USE INFORMATION WE COLLECT

We use, store, and process information, including personal information, about you to provide, understand, improve, and develop our Social Media presence, our services and functionalities, create and maintain a secure environment, pursue our legitimate interests and comply with our legal obligations.

Processing may entail one or more of the following activities:

- Enable you to communicate on our Social Media Accounts.
- Operate, protect, improve, and optimize your experience, such as by performing analytics and conducting research.
- Provide customer service.
- Send you service or support messages, updates, security alerts, and account notifications.
- To operate, protect, improve, and optimize our Social Media Services experience, and personalize, customize your experience, introduce you to our other Services, we conduct profiling based on your interactions.
- Detect and prevent spam, abuse and other harmful activity.
- Conduct security investigations and risk assessments.
- Enforce our legal rights.
- Send you promotional messages, marketing, advertising, and other information related to our products and the products and services of unaffiliated businesses that may be of interest to you based on your preferences and social media advertising through our Social Media Services.
- To provide personalised information about GiftCard Services offered by us on third-party websites and online services. We may use your Personal Data and other information collected in accordance with this Privacy Notice to provide a targeted display, feature or offer to you on third-party websites. We may use cookies and other tracking technologies to provide these online services and/or work with other third-parties such as advertising or analytics companies to provide these online services.
- To provide you with location-specific options, functionality or offers if you elect to share your Geolocation Information through the Services. We will use this information to enhance the security of the GiftCard Service and provide you with location-based Service, such as advertising, search results, and other personalised content.
- Personalize, measure, and improve our advertising.

- Administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by us or its third-party partners.
- For participation in games, quizzes and completion of questionnaire or a contest entry form for promotional campaigns.
- Conduct profiling on your characteristics and preferences to send you promotional messages, marketing, advertising and other information that we think may be of interest to you

We process this information given our legitimate interest in improving our Social Media presence, , to measure the adequate performance of our contract with you, comply with applicable laws, and where it is necessary for the adequate performance of a relationship with you or where applicable, given your consent in undertaking marketing activities to offer you products or services that may be of your interest.

3. WITH WHO DO WE SHARE PERSONAL DATA

3.1. With other members of the iCard AD corporate family: We may share your Personal Data with members of the iCard Group of companies or within our extended family of companies that are related by common ownership or control, so that we may provide the services you have requested or authorised or to manage the risk, or to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements and to help us manage the availability and connectivity of our Social Media Services.

3.2. With third party service providers: We may share personal information with third party service providers that support us in relation to our Social Media Accounts with functions at our decision and on our behalf.

These third-party service providers may for example:

- Marketing Service Providers;
- Marketing consultants;
- SEO and other similar software or consultancy providers
- Other similar providers
- IT Support providers

These providers have limited access only to your information necessary to perform the tasks for which they were contracted for on our behalf and are contractually bound to protect and to use it only for the purposes for which it was disclosed and consistent with this Privacy Notice.

3.3. With our legal counsels, auditors and similar for the purposes of protecting our legal rights. We may share any information which is necessary to protect our legal rights to legal counsels or similar parties.

3.4. With your consent: We also will share your Personal Data and other information with your consent or direction, including if you authorize an account connection with a third-party account or platform.

In addition, we may provide aggregated statistical data to third-parties, including other businesses and members of the public, about how, when, and why users visit our website and services. This data will not personally identify you or provide information about your use of our Social Media Services. We do not share your Personal Data with third parties for their marketing purposes without your consent.

3.5. Aggregated Data. We may also share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, demographic profiling, marketing and advertising, and other business purposes on the basis of our legitimate interests. This shall not constitute the processing of personal data since the information is anonymized.

3.6 Monitoring

We may monitor or record emails, web chat or other communications with you for regulatory, security, customer services or training purposes.

3.7 Business Transfers.

If any of the companies that provides our Social Media Services is involved in any merger, acquisition, reorganization, sale of assets, transfer of portfolio, bankruptcy, or insolvency event, then we may sell, transfer or share some or all our assets, including your information in connection with such transaction or in contemplation of such transaction (e.g., due diligence). In this event, we will notify you before your personal information is transferred to a different legal person and/or becomes subject to a different privacy notice/privacy policy.

4. YOUR RIGHTS

You may exercise any of the rights described in this section before the respective Data Controller by sending an email. Please note that we may ask you to verify your identity before taking further action on your request. Please note that upon receipt of your e-mail we shall try our best to provide you with the requested information and resolve your request in reasonable time, subject to all obligations which we or the related companies have under the applicable laws.

4.1 Managing Your Information.

You have the right to obtain the following:

- confirmation of whether and where we are processing your personal data;
- information about the purposes of the processing;
- information about the categories of data being processed;
- information about the categories of recipients with whom the data may be shared;
- information about the period for which the data will be stored (or the criteria used to determine that period);
- information about the existence of the rights to erasure, to rectification, to restriction of processing and to object to processing;
- information about the existence of the right to complain to any Regulator;
- where the data was not collected from you, information as to the source of the data; and information about the existence of, and an explanation of the logic involved in, any automated processing;
- Additionally, you may request a copy of the personal data being processed.

4.2 Rectification of Inaccurate or Incomplete Information.

You have the right to ask us to correct inaccurate or incomplete personal information concerning you (and which you cannot update yourself).

4.3 Data Access and Portability.

You have the right to:

- receive a copy of your personal data in a structured, commonly used, machine-readable format that supports re-use;
- transfer your personal data from one controller to another;
- store your personal data for further personal use on a private device; and
- have your personal data transmitted directly between controllers without hindrance.

In some jurisdictions, applicable law may entitle you to request copies of your personal information held by us.

4.4 Data Retention Periods.

Information of the retention periods can be found in the Privacy Policy - https://www.giftcards.eu/en/privacy_policy

4.5 Withdrawing Consent and Restriction of Processing.

Where you have provided your consent to the processing of your personal information by us you may withdraw your consent at any time by changing your Account settings or by sending a communication to us specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal. Additionally, in some jurisdictions, applicable law may give you the right to limit the ways in which we use your personal information, in particular where (i) you contest the accuracy of your personal information; (ii) the processing is unlawful and you oppose the erasure of your personal information; (iii) we no longer need your personal information for the purposes of the processing, but you require the information for the establishment, exercise or defence of legal claims; or (iv) you have objected to the processing and pending the verification whether our legitimate grounds override your own.

4.6 Objection to Processing.

In some jurisdictions, applicable law may entitle you to require us not to process your personal information for certain specific purposes (including profiling for marketing purposes) where such processing is based on legitimate interest. If you object to such processing we will no longer process your personal information for these purposes unless we can demonstrate compelling legitimate grounds for such processing or such processing is required for the establishment, exercise or defence of legal claims. In case you do not wish us to process your personal data for certain specific purposes, which are legitimate purposes to us, you shall have to stop interacting with our Social Media Account

Where your personal information is processed for direct marketing purposes, you may, at any time ask us to cease processing your data for these direct marketing purposes by sending an e-mail to the contact e-mails below.

4.7 Lodging Complaints.

4.7.1. You should in first place try to resolve the matter by sending an e-mail to:

- iCard's Data Protection Officer (DPO):
dpo@icard.com
iCard AD
Business Park Varna No B1, Varna 9023, Bulgaria

With regard to the processing activities of LinkedIn Ireland Limited Company carried out as a Joint Controller:

- LinkedIn's Data Protection Officer (DPO)
Contact form:
<https://www.linkedin.com/help/linkedin/ask/TSO-DPO>
LinkedIn Ireland Unlimited Company
Attn: Legal Dept. (Privacy Policy and User Agreement)
Wilton Plaza
Wilton Place, Dublin 2
Ireland

4.7.2 **Competent Regulator.** In case you are not satisfied with the reply or resolution of the respective Data Controller, you have the right to lodge complaints about the data processing activities carried out by us before the competent data protection supervisory authority - the Commission for Protection of Personal Data, Bulgaria:

- Address:
2 Prof. Tsvetan Lazarov blvd.
Sofia 1592
Bulgaria
e-mail: kzld@cpdp.bg
- In relation to LinkedIn Ireland Unlimited Company you have the right to lodge a complaint with Ireland Unlimited Company lead supervisory authority, the Irish Data Protection Commissioner. You can find its contact details at:

<https://www.dataprotection.ie/docs/Contact-us/b/11.htm>

5. OPERATING GLOBALLY

To facilitate our global operations, we may be required to transfer, store, and process your information within our family of companies or with service providers based in Europe, India, Asia Pacific and North and South America. Laws in these countries may differ from the laws applicable to your Country of Residence. For example, information collected within the EEA may be transferred, stored, and processed outside of the EEA for the purposes described in this Privacy Notice. Where we transfer store and process your personal information outside of the EEA we have ensured that appropriate safeguards are in place to ensure an adequate level of data protection.

6. INTERNATIONAL TRANSFERS

6.1 Adequacy Decisions.

Where we disclose any of your collected personal information outside EEA we shall comply with any relevant adequacy decision where possible.

6.2 Other Means to Ensure an Adequate Level of Data Protection.

In case personal information is shared with corporate affiliates or third-party service providers outside the EEA in absence of an adequacy decision, we have - prior to sharing your information with such corporate affiliate or third-party service provider – established the necessary means to ensure an adequate level of data protection and a valid legal ground under the applicable data transfer rules. We will provide further information on the means to ensure an adequate level of data protection on request.

7. SECURITY

We take the responsibility to ensure that your personal information is secure, kept in an encrypted form on servers, collocated in Special data centres in Class A jurisdictions in Europe. To prevent unauthorized access or disclosure of information we maintain physical, electronic and procedural safeguards that comply with applicable regulations to guard non-public personal information. Once you are logged into your Account, all internet communication is secured using Secure Socket Layer (SSL) technology with High-grade security Encryption (AES-256, 256 bit keys, certified by StartCom Ltd). We restrict access to your personally identifiable information only to employees who need to know that information in order to provide products or services to you.

8. CAN CHILDREN USE OUR SERVICES?

Interaction with our Social Media Accounts is not intended for individuals under the age of 18. We do not knowingly collect information, including Personal Data, from children or other individuals who are not legally able to use our Social Media Services. If we obtain actual knowledge that we have collected Personal Data from an individual under the age of 18, we will promptly delete it, unless we are legally obligated to retain such data. Contact us if you believe that we have mistakenly or unintentionally collected information from an individual under the age of 18.

9. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to modify this Privacy Notice at any time in accordance with this provision. If we make changes to this Privacy Notice, we will post the revised Privacy Notice on our Social Media Platform Account.

10. CONTACT US

If you have any questions or complaints about this Privacy Notice or our information handling practices, you may email us from your registered e-mail for the Services to the e-mails stated above in **Section 4**.