

## Privacy Policy for Users

*This Privacy Policy is intended to provide all information on the processing of personal data carried out by Turgon Management LTD when the user signs up for a prize competition available on this site.*

### 1. INTRODUCTION - ABOUT US

Turgon Management LTD with registered office in 167-169, Great Portland Street, 5th Floor, London, United Kingdom, W1W 5PF (hereinafter, "**Data Controller**"), owner of the website emcomit.com (hereinafter, the "**Website**"), as the data controller of the personal data of users who browse and subscribe to the initiative accessible through the Website (hereinafter, "**Users**") provides below the Privacy Policy pursuant to art. 13 of EU Regulation 2016/679 and the UK General Data Protection Regulation (hereinafter, respectively, the "**Regulation**" and the "**UK GDPR**" and, jointly, the "**Applicable Regulation**"). Our ICO registration number is ZB496512

### 2. HOW TO CONTACT US?

The Data Controller takes the utmost account of Users' right to privacy and personal data protection. For any information related to this Privacy Policy, Users can contact the Data Controller at any time, via any of the following means:

- By sending an e-mail to: [info@emcomit.com](mailto:info@emcomit.com);

EU - Ireland Representative

- Company Name: Instant EU GDPR Representative Ltd
- Name: Adam Brogden
- Email: [contact@gdprlocal.com](mailto:contact@gdprlocal.com)
- Tel: + 353 15 549 700
- EU Dublin Address: INSTANT EU GDPR REPRESENTATIVE LIMITED Office 2 12A Lower Main Street, Lucan Co. Dublin K78 X5P8 Ireland

### 3. HOW DO WE GET INFORMATION?

The Data Controller collects personal data only directly from Users who register via the form on the Website. No data are collected from other sources and no data belonging to special categories or criminal conviction data are processed.

### 4. WHAT DO WE DO? - PURPOSE OF THE PROCESSING

Users' personal data will be processed lawfully by the Data Controller pursuant to Article 6 of the Regulation for the following processing purposes:

**a) participation in the prize competition**, to allow the Website navigation or to execute the rules of the prize event, accepted by the User during registration and to fulfil specific requests of the User. The User's data collected by the Data Controller for the purposes of participation include: gender, name, surname, date of birth, residential address, email address and telephone number. Without prejudice to the other provisions contained within this Privacy Policy, the User's personal data will be used by the Data Controller also for the purpose of ascertaining the identity of the User (also by validating the email address), thus avoiding possible scams or abuses, and contacting the User for service reasons only (e.g. managing the User's participation in the prize event, notifying any winnings and managing the phase of awarding and delivery of prizes; contact the User to obtain additional data and information - such as a copy of the identity card; make any urgent communications by telephone during the collection and use of prizes).

**b) legal obligations**, or to fulfil obligations established by law, by an authority, by a regulation or by European legislation.

**c) Marketing**

Some of the User's personal data (i.e. name, surname, email address and telephone number) may also be processed by the Data Controller for marketing purposes (sending advertising material, direct sales, commercial communication), or so that the Data Controller can contact the User by mail, email, telephone (landline and/or mobile, with automated call or call communication systems with and/or without the intervention of an operator) and/or SMS and/or online messaging services (WhatsApp, Telegram, WeChat) to propose to the User the purchase of products and/or services offered by the same Data Controller and/or third-party companies, to present offers, promotions and commercial opportunities.

In case of consent, the User may at any time revoke the same making a request to the Data Controller in the manner and via the channels indicated in the following article 8.

The User can also easily oppose further sending of promotional communications via email also by clicking on the appropriate link for the withdrawal of consent, which is present in each promotional email. Once the consent has been revoked, the Data Controller will send a notification to the User to confirm that the consent has been revoked. If the User intends to withdraw his consent to the sending of promotional communications by telephone, while continuing to receive promotional communications via email, or vice versa, please send a request to the Data Controller in the manner and via the channels indicated in the following article 7.

The Data Controller declares that following exercise of the right to object to receipt of advertising by email, it is possible that, for technical and operational reasons (e.g., formation of contact lists already completed shortly before the Data Controller's receipt of the objection) the User continues to receive some additional promotional messages. Should the User continue to receive promotional messages 24 hours after exercising the right to object, please report the problem to the Data Controller, using the contacts details indicated in the following article 8.

**d) Communication of data to third-party companies**

With the User's free and optional consent, the User's personal data (name, surname, date of birth, address, house number, city, zip code, e-mail, telephone number and IP address) will be communicated from the Owner to the following categories of third-party companies:

- (i) landline and mobile telephone companies;

- (ii) companies which operate in the publishing world (printed, internet, television and new media);
- (iii) companies which operate in the field of e-commerce of products and services;
- (iv) companies operating in the energy sector;
- (v) companies operating in the travel and leisure sector;
- (vi) companies that deal with professional and/or school training;
- (vii) advertising agencies, media and contact centres;
- (viii) companies operating in the food sector;
- (ix) NGOs and ONLUS;
- (x) companies operating in the financial and insurance sector;
- (xi) companies operating in repair of household appliances;
- (xii) companies operating in the marketing and web communication sector, as well as their commercial partners, belonging to the e-commerce, mail order, publishing, utilities, tourism, sports, communication, entertainment, financial, insurance, automotive, large sectors consumption, for sending advertising material and other promotional and commercial purposes, by post or telephone and/or automated call systems or call communication without the intervention of an operator and/or electronic communications such as email, fax, messages like MMS or SMS or other types;
- (xiii) companies operating as Marketing Services Providers who will use it for a variety of direct marketing, testing, research & product development purposes. Marketing Services Providers may use Users' data to create models useful to predict behaviour and preferences (e.g. how likely you are to buy a holiday online or take a particular type of holiday) or likely circumstances (e.g. whether you are eligible for a particular credit card);
- (xiv) companies providing repair services for household white goods and similar appliances.

Our website collaborates with sponsors, partners, and selected third parties from various industries. These include Retail, Automotive, Lifestyle, Charity, Utility, Telecommunications, Insurance, Publishing/Media, Entertainment/Gaming/Leisure, Public Sector, Financial Services, Travel, Mail Order, Health/Beauty, Education, FMCG (Fast-Moving Consumer Goods), Marketing Agencies and Brokers, Property, Pharmaceuticals, Claims Companies, and Short Term Loans. These entities may process your personal data for their marketing purposes, which can include direct sales, advertising, and commercial communications. They may contact you via mail, email, phone, SMS, or online messaging services (e.g., WhatsApp, Telegram, WeChat) to present offers, promotions, and commercial opportunities related to their products and/or services. For more details, and to view our Extended List of Third-Party Companies, please visit <https://emcomit.com/sponsors.pdf> . The responsibility for providing necessary information as per Applicable Regulation falls on the Data Controller's business partner once the data transfer occurs.

We partner with WINR Data Pty Ltd. (WINR) and their global partners to use your contact information for two main purposes:

**ID Protection:** This includes measures to prevent misuse of your details, such as ID validation for anti-money laundering, anti-fraud, crime prevention, asset recovery, debt collection, and reuniting people with unclaimed assets.

**Targeted Advertising:** Our partners may use data analysis, profiling, and behavior prediction to provide you with relevant advertising offers.

Your information will be retained by WINR and their partners as long as necessary for these purposes. You can opt out of WINR's activities by contacting their Privacy Officer at WINR Privacy Policy. <https://www.winrdata.com/privacy-policy>

In addition, we share your data with other third-party partners, including Data OD Ltd and various companies listed here <https://dataondemand.co.uk/personal-data-privacy-notice/>. These partners may use your data for targeted advertising, fraud prevention, identity verification, and other related purposes. They will process your data either based on their relationship with you or where they have a lawful reason, such as their legitimate interest.

The shared data may be used for affordability assessments, anti-money laundering, fraud prevention, identity verification, and other services. If you do not wish your data to be used in this manner by Data OD Ltd, you can opt out using this link. <https://dataondemand.co.uk/opt-out/>

Our other third-party partners, including companies process your data for similar purposes. They act as independent data processors and will provide you with their specific privacy policies. . These companies include:

Howden Insurance (formerly known as A-Plan Insurance) - <https://www.howdeninsurance.co.uk/common-pages/privacy-notice/>

Beagle Street - <https://www.beaglestreet.com/privacy-policy/>

Claims Advisory Services - <https://claimsadvisoryservices.co.uk/privacy-policy/>

LocaliQ - <https://www.newsquest.co.uk/assets/pdf/marketing-services-cookie-policy.pdf>

Gallagher (Arthur J Gallagher & Co) - <https://www.ajg.com/uk/brokerage-privacy-policy/>

Mdeg Ltd, 63/66 Hatton Garden, Fifth Floor, Suite 23, London, EC1N 8LE - <https://www.mdeg.co.uk/how-we-process-data.html>

Mercedes Benz - <https://www.mercedes-benz.co.uk/>

McCarthy & Stone (Developments) Limited - <https://www.mccarthyandstone.co.uk/privacy-and-cookies/>

Kwik Fit - <https://www.kwik-fit.com/about-us/privacy-notice>

Legal Ventures Ltd trading as Air Travel Claim - <https://airtravelclaim.com/privacy-policy/>

Samsung Electronics - <https://www.samsung.com/uk/info/privacy/>

Sky UK Limited - <https://www.sky.com/help/articles/sky-privacy-and-cookies-notice>

Sunlife Limited - <https://www.sunlife.co.uk/information-and-legal/privacy-policy/>

So Energy - <https://www.so.energy/privacy/>

Twenty Ci Limited - <https://www.twentyci.co.uk/data-privacy-policy/>

The Boots Company PLC - <https://www.boots.com/>

Housing Triage - <https://www.housingtriage.com/privacy-policy/>

Your consent for data sharing is optional, but without it, you may not be able to register on our website or use our services. You can revoke your consent at any time by contacting us as detailed in our 'Rights of the Interested Parties' section.

We also allow you to select which partners you consent to share your data with during the registration process.

## Marketing Services Providers

We will share your data which may include your address, telephone number, email address, IP address and date of birth, with the Marketing Services Providers listed below, who will use it for a variety of direct marketing, targeted advertising, measurement & identity resolution purposes. Marketing Services Providers carry out data profiling. They will combine your data with data they get from other sources (including public sources) and use it to create “predictive models”. Marketing Services Providers use these models to try to predict behaviour and preferences (e.g. how likely you are to buy a holiday online or take a particular type of holiday) or likely circumstances (e.g. whether you are eligible for a particular credit card).

Marketing Services Providers will also try to match and then link your data with data that they receive about you from other sources, to make sure that the data they hold about you is correct:

For example, they might do this to

- check whether you have recently moved address; or
- keep the IP address they hold about you up to date. IP addresses change regularly. The IP address they receive from us might change too quickly to make the data you provide through us useful for marketing purposes. Marketing Services Providers might find it helpful for this to be refreshed from time to time to ensure marketing messages are being delivered to the correct consumers, on the correct device(s).

They share your data, including the profiled data they have created about you, primarily to:

- help organisations better understand the likely characteristics of their customers (and find others like them);
- improve the relevancy and appropriateness of an organisation’s marketing to its customers (e.g. offers, its products and services); and
- help them communicate with their customers more effectively offline and online. This may mean that you receive tailored advertising via direct mail, email or when you visit a website.

To understand more about the use of your data by Marketing Services Providers, and to find out how to exercise your data protection rights in relation to their use of your data (including how to opt-out), please click through to the websites of the companies below:

Audience Serv - <https://www.audienceserv.com/privacy.html>

C-Centric Ltd - <https://www.ccentric.co.uk/privacy-policy/>

Experian Ltd - <https://www.experian.co.uk/privacy/consumer-information-portal>

Lloyd James Media Ltd - <https://lloydjames.com/privacy-cookie-policy/>

LiveRamp – <https://liveramp.uk/privacy/web-privacy-policy/>

We will share your data with LiveRamp, who will use it for a variety of direct marketing, targeted advertising, measurement & identity resolution purposes. You can learn more and opt-out from their services at any time:

<https://liveramp.uk/privacy/web-privacy-policy/>

Mdeg Ltd, 63/66 Hatton Garden, Fifth Floor, Suite 23, London, EC1N 8LE

<https://www.mdeg.co.uk/how-we-process-data.html>

Potential D Ltd - <https://www.potentiald.co.uk/>

Results Generation Ltd

Kaleido II, 9390 Research Blvd suite 420, Austin, TX 78759, United States

<https://resultsgeneration.com>

Sagacity Solutions Ltd - <https://www.mydatachoices.co.uk/Privacy>

We are permitted to share information with Sagacity who will share such information for marketing and non-marketing purposes (including credit and risk assessment and management, identification and fraud prevention, enforcement, debt collection and returning assets to you).

The Data Partnership Group Ltd T/A TDP Agency (Co Reg 00612316) - ICO ZA537625 - <https://tdpagency.co.uk/privacy-policy/>

USM LTD <https://www.usmdigital.co.uk/privacy-policy/>

In sharing your data with Marketing Services Providers, we rely on a lawful ground called ‘legitimate interest’, as our business depends on our ability to partner with third parties who process personal data for marketing-related reasons.

## 5 LEGAL BASIS

**Participation in the competition** (as described in the previous par. 4, lett. a)): The lawful basis for processing personal data for the purpose of participation in the competition is consent.

This is in accordance with Article 6(1)(a) of the GDPR, which states that personal data may be processed only if the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

Please note that Users have the right to withdraw their consent at any time by contacting the data controller at [info@emcomit.com](mailto:info@emcomit.com)

**Legal obligations** (as described in the previous article 4, lett. b)): the processing is necessary to fulfil a legal obligation to which the Data Controller is subject.

**Marketing activities** (as described in the previous article 4, lett. c)) and for **communication of data to Third Party Companies** for their marketing purposes (as described in the previous article 3, lett. d)), the legal basis is constituted by the provision by the data subjects of a consent to the processing of personal data for one or more specific purposes. For this reason, the Data Controller asks the User to provide a specific, free and optional consent to pursue each of these processing purposes.

Please notice that the Third-Party Companies may rely on different legal basis in order to undertake further processing activities, such as their Legitimate Interest, as better specified in their privacy policies, provided for in the Extended List available at <https://emcomit.com/>.

In case data shall be processed by said parties in pursuance of legitimate interests, it may include using such data for postal and telephone marketing - for said Third-Party Companies or others - but in either case communication shall be in relation to products or services which the Third Parties believe may be of interest to the Users based upon information which the Users have provided. As with all Users' data, the Users can also object to Third-Party Companies processing their data in this way.

## 6 PROCESSING METHODS AND DATA RETENTION TIMES

Users' personal data will be processed by the Data Controller using manual and IT tools, as strictly necessary to achieve the purpose for which they are processed, and in any event, to ensure confidentiality of the data. The Data Controller implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

- (i) the pseudonymisation and encryption of personal data;
- (ii) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- (iii) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.
- (iv) a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

The personal data of the Users of the Website will be kept for the time strictly necessary to carry out the primary purposes connected to the User's participation in the competition (illustrated in article 4 above) and in any case for the time necessary for the civil protection of both User's and the Data Controller's interests (therefore, indicatively, between 2 and 4 years).

In the cases referred to in paragraphs 3, lett. c) and d), Users' personal data will be kept by the Data Controller for as long as the User continues to carry out actions (we consider "actions" and "activities", by way of example and not exhaustive, any access to the portal, interaction with communications sent by the Data Controller and/or Third-Party Companies, access to any service or content of the Platform) and, in any case, up to the withdrawal of consent. If the User does not carry out any activity for a period of 36 months, the Data Controller will proceed with the cancellation of personal data.

The data retention period by Third-Party Companies can be found by the User in the information provided by them pursuant to the Applicable Regulation.

## **7 SCOPE OF DISCLOSURE AND DISSEMINATION OF DATA**

We store your personal data within the European Economic Area and it is transferred to countries within the European Economic Area. In agreement with our partners in article 3(d), it is possible that your data will be transferred to "third countries". Third countries are countries located outside the European Union. In relation to such data transfers, a secure transfer within the scope of EU specifications on data protection and privacy are ensured. The Applicable Regulation permits the transfer of personal data from United Kingdom to the EEA and to any countries which, as at 31 December 2020, were covered by a European Commission 'adequacy decision' (this is to be kept under review by the UK Government).

Users' personal data may be disclosed to the employees and/or collaborators of the Data Controller in charge of managing the Website. These subjects, who are formally appointed by the Data Controller as "data processors", will process the User's data exclusively for the purposes indicated in this policy and in compliance with the provisions of the Applicable Regulation.

Third parties who may process personal data on behalf of the Data Controller as Data Processors may also become aware of the Users' personal data, such as, for example:

- service providers (such as administrative, IT, mailing services, credit recovery companies, etc.);
- consultants (such as accountants, auditing firms, lawyers, etc.);
- companies of the same group, associated companies.

Users have the right to obtain a list of any data processors appointed by the Data Controller, by making a request to the Data Controller in the manner indicated in article 8 below.

Furthermore, the personal data of the Users may be communicated by the Data Controller, as well as to the Third-Party Companies referred to in article 3, let. d), to other third parties to the extent that this is necessary to execute the competition regulations and/or to fulfil legal obligations, such as any public authority in charge of controlling the application of the rules on competitions and sweepstakes, as well as third parties indicated in the prize competition regulations, to which the data must necessarily be communicated to allow the User to take advantage of any prizes won (e.g. travel agencies, ticket offices, hotels, etc.).

## **8 RIGHTS OF DATA SUBJECTS**

Users may exercise their rights pursuant to the Applicable Regulations by contacting the Data Controller as follows:

- By sending an e-mail to: [info@emcomit.com](mailto:info@emcomit.com)

Pursuant to the Applicable Regulations, the Data Controller hereby declares that Users have the right to obtain information on (i) the source of their personal data; (ii) the purposes and methods of the processing; (iii) the logic applied to the processing, if carried out by means of electronic tools; (iv) the identity of the Data Controller and the Data Processor; (v) the parties or categories of party to whom the personal data may be communicated or who may gain knowledge of them in their capacity as data processing managers or persons in charge of processing.

Furthermore, Users have the right to obtain:

- a) **access, update, rectify** or, should they wish to do so, **integrate** their data;
- b) the **cancellation, transformation into anonymous form** or **blocking** of data which have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;
- c) confirmation that the operations under a) and b) have been made known, including regarding their contents, to those to whom the data has been communicated or distributed, except in the event such compliance proves to be impossible or leads to the use of manifestly disproportionate means in respect of the right defended.

Furthermore, Users have:

- a) the right to **withdraw consent** at any time, if the processing is based on their consent (it should be noted that this withdrawal does not affect the lawfulness of the processing based on consent before the withdrawal);
- b) the right to **data portability** (the right to receive all their personal data in a format that is structured, commonly used and readable by automatic devices), the **right to limit the processing** of personal data and the **right to cancellation** ("right to be forgotten");
- c) the **right to object**:
  - i) in whole or in part, for legitimate reasons, to the processing of their personal data, even if pertinent to the purpose of the collection;
  - ii) in whole or in part, to the processing of their personal data for the purpose of sending advertising and direct marketing materials, or for carrying out market research or business communications;
  - iii) if personal data is processed for direct marketing purposes, at any time to object to the processing of their data for this purpose, including profiling in so far as it is connected to such direct marketing.
- d) Whereby it is believed that processing of the data is in breach of the Regulation, the right to file a complaint with the Supervisory Authority (in the Member State in which they normally reside, in which they work or in which the alleged violation has occurred). The UK supervisory authority is the Information Commissioner Office and their contact details are: The Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF <https://ico.org.uk/global/contact-us/> Tel: 0303 123 1113.

The Data Controller is not responsible for updating all links that can be viewed in this Policy, therefore whenever a link is not functional and/or current, Users acknowledge and accept that they must always refer to the document and/or section of the websites referred to by the link.

## **9. UPDATES TO THIS PRIVACY POLICY**

We keep our privacy notice under regular review to make sure it is up to date and accurate. We may make changes to this privacy policy from time to time. You should check this page regularly to see our most up to date policy. This privacy policy was last updated 4 September 2024.