



# Privacy Policy

Herein we provide all information about how we, at so.fa.dog process your data and what are your rights thereto

---

Here we provide information regards to who we, so.fa.dog are.

## 1. WHO WE ARE

- 1.1 We are a legal person, established pursuant to the laws of Estonia: so.fa.dog OÜ (hereinafter: so.fa.dog), registry code 14907465, address: Kastiku tee 9, Tallinn 11912, Estonia.
  - 1.2 This Privacy Policy defines how so.fa.dog processes Your personal data, thus understanding Privacy Policy is important because, to use our services, you confirm reading and understanding of it.
  - 1.3 So.fa.dog may process Personal Data as:
    - (1) a controller, while determining the purposes and means of processing;
    - (2) a processor in accordance with the instructions from the controller; and
    - (3) a recipient to the extent to whom the Personal Data are transferred.
  - 1.4 This Privacy Policy constitutes an inseparable part of the Terms and Conditions.
  - 1.5 The Privacy Policy shall use definitions written in caps for such terms that are defined in Terms and Conditions or [General Data Protection Regulation \(GDPR\)](#) and it applies to the Data Subjects, and the rights and obligations set out in the Privacy Policy shall be followed by all the employees and cooperation partners of so.fa.dog who come into contact with the personal data that are in the possession of so.fa.dog.
  - 1.6 The Privacy Policy may supplement the privacy statements published on the services (such as website, mobile application), and the Privacy Policy may also be amended and supplemented by the same.
  - 1.7 You may always contact us to enquire about these Privacy Policy or for any assistance at [hi@so.fa.dog](mailto:hi@so.fa.dog).
- 

Here we describe what you can expect by using so.fa.dog.

## 2. WHAT WE DO

- 2.1 So.fa.dog provides condensed video news in an easy to navigate format. We collect, analyze and rationalize news stories around the world and publish abstracts, short summaries as our journalistic activities. Our aim is to enable everyone to consume any news clip in just seconds by only showing the essential information.
  - 2.2 So.fa.dog is creating its service for its customers, not for advertisers. Our aim is to bring all relevant news to our customers in an affordable, accessible, easy to follow mode, without the distraction of advertisements.
  - 2.3 The views expressed in news stories don't reflect our views as our aim is to make accessible different news stories and noteworthy information.
- 

Here you find the principles that are always followed by so.fa.dog while

## 3. PRINCIPLES

- 3.1 Our services are developed for adults keeping privacy by design and by default in mind. We abide by principle to collect any personally identifiable data from
-

---

## Processing your Personal Data.

- our users as little as possible. This means we will not track you, retain your device or connection data nor contact you on our initiative.
- 3.2 All the processes, guidelines, operations and activities of so.fa.dog that are related to Personal Data Processing are based on the following principles:
- (1) **Lawfulness.** There is always a legal basis for the Processing of Personal Data, i.e. consent;
  - (2) **Fairness.** Personal Data Processing shall be fair, while providing a Data Subject with sufficient information and communication on how the Personal Data are Processed;
  - (3) **Transparency.** Personal Data Processing shall be transparent for the Data Subject;
  - (4) **Purposefulness.** Personal Data shall be collected for legitimate purposes that have been established precisely and clearly, and shall not later be processed in any manner which is in conflict with these purposes;
  - (5) **Minimisation.** Personal Data shall be adequate, relevant and limited to what is necessary for the purpose of Processing the given Personal Data. So.fa.dog shall be guided by the principle of minimum Processing in Personal Data Processing, and as soon as the Personal Data are no longer necessary or are no longer needed for the purposes for which they were collected, the Personal Data shall be deleted;
  - (6) **Accuracy.** Personal Data shall be correct and shall be updated as necessary, and all reasonable measures shall be taken to ensure that Personal Data which are incorrect in the light of the purpose of Personal Data Processing shall be deleted or corrected without delay;
  - (7) **Limit of storage.** Personal Data shall be stored in the format enabling the identification of Data Subjects only as long as it is necessary to achieve the purpose for which the Personal Data are processed. It means that in case so.fa.dog wishes to store the Personal Data for a longer period of time than necessary for the purpose of collecting the data, so.fa.dog shall anonymise the data in such manner that the Data Subject shall no longer be identifiable;
  - (8) **Reliability and confidentiality.** Personal Data Processing shall be carried out in the manner ensuring the adequate security of Personal Data, including their protection against unauthorised or unlawful Processing and against accidental loss, destruction or damage, by taking reasonable technical or organisational measures. So.fa.dog has internal guidelines, rules for the employees, and separate agreements with every processor, stipulating the best practices, on-going risk assessment and adequate technical and organisational measures for Personal Data Processing;
  - (9) **Data protection by design and by default.** So.fa.dog shall ensure that all the systems used shall meet the required technical criteria. The suitable data protection measures have been planned upon the renewal or design of every information or data system (e.g. the information systems and business processes are constructed using pseudonymisation and encryption).
- 3.3 Upon Personal Data Processing so.fa.dog shall act with the purpose of always being capable of evidencing the conformity to the aforesaid principles and additional information regarding the conformity to these principles can also be requested from so.fa.dog.
- 

## Here you find information on which Personal Data we collect.

### 4. COMPOSITION OF PERSONAL DATA

- 4.1 To use so.fa.dog services the following data may be collected from you:
- (1) Your IP address and unique mobile device identification numbers (such as your device ID, advertising ID, MAC address), unique subscriber ID;
  - (2) Data we collect with cookies and similar technologies Cookies Notice;
  - (3) Data (such as your nickname) we receive if you use our social media page;
  - (4) details of orders (free trial, amount spent, date, time, vouchers or offers used);
  - (5) Data from platforms (such as to verify payment for in-app purchases);
  - (6) Unique tokens that enable users to make purchases using the information the payment processor has stored that is made available to so.fa.dog by payment processors or platforms.
  - (7) Data you directly give to so.fa.dog (such as when contacting our support).
- 4.2 For the purposes of clarity, as so.fa.dog is aiming to be a company using as little
-

---

Personal Data as possible, most of the data collected are handled by third party to enable in-app purchases (such as App Store and Google Play) and so.fa.dog does not retain such data.

---

Here you find out for which purposes and under which bases we can Process your Personal Data.

## 5. COMPOSITION, PURPOSES AND BASES FOR PROCESSING OF PERSONAL DATA

- 5.1 So.fa.dog shall Process Personal Data only on legal basis. Legal bases for Processing of Personal Data include but are not limited to consent, legitimate interests or an agreement between the Data Subject and so.fa.dog.
- 5.2 So.fa.dog shall Process Personal Data on the basis of **consent** precisely within the limits, to the extent and for the purposes determined by the Data Subject. As for consents, so.fa.dog shall follow the principle that every consent shall be clearly distinguishable from other matters, in an intelligible and easily accessible form, using clear and plain language. Consent may be given in writing or by electronic means. A Data Subject shall give the consent freely, specifically, informedly and unambiguously, for example by ticking a box for using so.fa.dog services.
- 5.3 **Upon entry into and performance of an Agreement**, so.fa.dog may Process Personal Data for the following Purposes:
- (1) to identify you to the extent required by due diligence or inasmuch as necessary for enabling in-app purchases;
  - (2) to perform the obligations to you regarding the provision of its services;
  - (3) to communicate with you;
  - (4) to submit, realise and defend claims.
- 5.4 **Legitimate interest** means the interest of so.fa.dog in the management and direction of its business in order to be able to offer the best possible Services on the market. So.fa.dog shall Process Personal Data on a legal basis only after careful consideration in order to ascertain the legitimate interest of so.fa.dog, based on which the Personal Data Processing is necessary and is in compliance with the interests and rights of a Data Subject (after carrying out the so-called three-step test). In particular, Personal Data Processing may take place on the basis of a legitimate interest for the following purposes:
- (1) for our news stories, however in those cases we abide by the strict principle that we publish personal data in so.fa.dog for journalistic purposes without the consent of the data subject only if there is public interest therefore and this is in accordance with the principles of journalism ethics and it does not cause excessive damage to the rights of any data subjects;
  - (2) for ensuring a trust-based relationship with you, for example Personal Data Processing that is strictly necessary to determine the ultimate beneficiaries or to prevent fraud;
  - (3) for the administration and analysing the client base to improve the availability, selection and quality of services and products, and to make the best and more personalised services and offers to you;
  - (4) for the identifiers and Personal Data collected upon the use of websites, mobile applications and other services. So.fa.dog shall use the collected data for web analysis or for the analysis of mobile and information society services, for ensuring and improving the functioning, for statistical purposes and for analysing the behaviour and user experience and for providing better and more personalised services;
  - (5) for the organisation of campaigns, including organisation of personalised and targeted campaigns, carrying out satisfaction surveys, and measuring the effectiveness of the performed marketing activities;
  - (6) for monitoring of the service. So.fa.dog may record the messages and instructions given in its premises as well as by means of communication (e-mail, telephone, etc.), as well as information and other operations carried out by so.fa.dog, and shall use those recordings as needed to evidence instructions or other operations;
  - (7) for network, information and cyber security considerations, for example for fighting against piracy and for ensuring the security of the services, as well as for the measures taken for making and storing backup copies;
  - (8) for corporate purposes, in particular for the financial management and for transferring Personal Data within the group for internal administrative purposes, including the Processing of the Clients' Personal Data;
  - (9) for the establishment, exercise or defence of legal claims.
-

- 
- 5.5 **For performing a legal obligation**, so.fa.dog shall Process Personal Data to perform the obligations set forth by law or to exercise the uses permitted by law. Legal obligations derive, for example, from adhering to the rules of payment processing and prevention of money laundering.
- 5.6 In case Personal Data Processing is carried out for a **new purpose**, different from those for which the Personal Data were originally collected, or is not based on the consent given by the Data Subject, so.fa.dog shall carefully assess the permissibility of such new Processing.
- 

Here you find information on when we may transfer your Personal Data to our cooperation partners within or outside of EU.

## 6. DISCLOSURE AND/OR TRANSFER OF DATA TO THIRD PERSONS

- 6.1 So.fa.dog cooperates with persons, to whom so.fa.dog may transfer data regarding the Data Subjects, including their Personal Data, in the context and for the purposes of co-operation. Such third persons may be:
- (1) so.fa.dog secure e-commerce payment providers (e.g. for in-app purchases Apple App Store, Google Play);
  - (2) IT service providers and (cloud) server providers (e.g. [Leaseweb Netherlands B.V.](#));
  - (3) advertising and marketing partners, companies carrying out client satisfaction surveys, debt collection agencies, credit registers, IT partners, persons, authorities and organisations intermediating or providing (electronic) mail services.
- 6.2 Any transfer is done by so.fa.dog if it is provided that:
- (1) the respective purpose and the Processing are lawful;
  - (2) the Personal Data Processing is carried out in accordance with the guidelines of so.fa.dog and on the basis of a valid agreement.
- 6.3 So.fa.dog shall transfer Personal Data to the outside of the European Union only if there is sufficient protection in the respective country; if protection measures have been agreed upon and the transfer is clearly permitted under applicable laws.
- 

Here you find a description of how we will protect your Personal Data and where you can find information on the storage periods of Personal Data.

## 7. SECURITY OF PERSONAL DATA PROCESSING

- 7.1 So.fa.dog shall store the Personal Data strictly only for the minimum period required. As the Personal Data collected by so.fa.dog in large extent is unique subscriber ID or unique device ID-s, we shall retain this information for 3 years as this is the limitation of claims deriving from laws.
- 7.2 The Personal Data with an expired storage period shall be destructed using the best practice and in accordance with the procedure established for this purpose by so.fa.dog.
- 7.3 In case of an incident related to Personal Data, so.fa.dog shall take all necessary measures to mitigate the consequences and hedge any relevant risks in the future. Inter alia, so.fa.dog shall register all the incidents and shall inform the Data Protection Inspectorate and the Data Subject directly (e.g. by email) or in public (e.g. via the news) in prescribed cases.
- 

The Services of so.fa.dog are not targeting Children.

## 8. PROCESSING OF THE PERSONAL DATA OF CHILDREN

- 8.1 The Services of so.fa.dog, including the information society services, are not targeting Children.
- 8.2 So.fa.dog does not knowingly collect any information on persons under 13 years of age, i.e. Children, and in case of any respective informed activity we shall act on the basis of the requests of a parent or guardian (including consent to send products to the name of a Child).
- 8.3 In case so.fa.dog finds out that it has still collected Personal Data from a Child or regarding a Child, so.fa.dog shall use its best efforts to discontinue the Processing of the respective Personal Data.
- 

Your Personal Data belong to you, and

## 9. RIGHTS OF DATA SUBJECTS

---

---

here you find information on the rights you have in protecting your Personal Data.

- 9.1 Rights related to consent:
- (1) A Data Subject will always be entitled to inform so.fa.dog about his or her wish to withdraw the consent for the Personal Data Processing.
  - (2) You will be able to view, change and withdraw your consents given to so.fa.dog on the User Account or by contacting so.fa.dog.
- 9.2 A Data Subject has also the following rights upon Personal Data Processing:
- (1) **Right to receive information** i.e. the right of a Data Subject to receive information regarding the Personal Data collected about him or her.
  - (2) **Right of access to data** which, inter alia, includes the right of a Data Subject to a copy of the Processed Personal Data.
  - (3) **Right to rectification of inaccurate Personal Data.** A Data Subject shall contact so.fa.dog for this purpose.
  - (4) **Right to erasure of data** i.e. in certain cases a Data Subject will be entitled to demand the deletion of Personal Data, for example if the Processing is carried out only on the basis of a consent.
  - (5) **Right to demand restriction of Personal Data Processing.** This right is created, inter alia, in case the Personal Data Processing is not permitted under law or if the Data Subject challenges the accuracy of the Personal Data. A Data Subject will be entitled to demand the restriction of the Personal Data Processing for a period enabling the processor to check the accuracy of the Personal Data or if the Personal Data Processing is unlawful but the Data Subject does not request the deletion of the Personal Data.
  - (6) **Right to data portability** i.e. a Data Subject shall have, in certain cases, the right to receive the Personal Data in a machine-readable format, and to take these data along or transfer them to another controller.
  - (7) **Rights related to automated Processing** mean, inter alia, that a Data Subject will have the right to object, on grounds relating to his or her particular situation, at any time to Processing of Personal Data concerning him or her, based on automated decision-making.
  - (8) **Right to the assessment of a supervisory authority** on whether the Processing of the Personal Data of the Data Subject is lawful.
  - (9) **Compensation for damage.**
- 

Here you find information on how to receive explanations or how and to where a complaint should be filed.

## 10. EXERCISING OF RIGHTS AND FILING OF COMPLAINTS

- 10.1 **Exercising of rights.** A Data Subject will be entitled to address so.fa.dog via [hi@so.fa.dog](mailto:hi@so.fa.dog) in case of any question, request or complaint related to Personal Data Processing.
- 10.2 **Filing of complaints.** A Data Subject will be entitled to address a complaint to so.fa.dog and the Data Protection Officer of so.fa.dog, to the Data Protection Inspectorate or to a court if the Data Subject is of the opinion that his or her rights have been infringed in Personal Data Processing. The contact details of the Data Protection Inspectorate are available on the website of the Data Protection Inspectorate: <http://www.aki.ee/>.
- 

Here you find information on the types of Cookies or other technologies we use and how you can control the use of such technologies.

## 11. COOKIES AND OTHER WEB TECHNOLOGIES

- 11.1 So.fa.dog may collect data regarding the users of its services by using Cookies and other web technologies for this purpose (i.e. small pieces of information stored by the browser on the hard disk of the computer or any other device) or other similar technologies (e.g. IP address, equipment information, location information) and process these data.
- 11.2 So.fa.dog uses the collected data to enable the provision of the Service in accordance with the habits of a users; to ensure the best Service quality; to inform the user about the contents and give recommendations; to update advertisements and make marketing efforts more efficient; and to facilitate logging in and protection of data. The collected data shall also be used for counting the users and recording their using habits.
- 11.3 So.fa.dog uses session Cookies, persistent Cookies and advertising Cookies. A session Cookie is deleted automatically after every visit; persistent Cookies shall remain upon repeated use of the Website, and advertising Cookies and third party Cookies are used by the Websites of the partners of so.fa.dog which are connected with the Website of so.fa.dog. So.fa.dog does not control the
-

---

generation of those Cookies, therefore information on these Cookies can be obtained from third persons. Further information on Cookies is available in the explanatory materials.

- 11.4 As to the Cookies, user agree with the use of Cookies on the Website, in information society service devices or the web browser.
- 11.5 Most of the web browsers allow Cookies. Without fully allowing Cookies, the functions of the Website are not available to a Visitor. The allowing or prohibiting Cookies and other similar technologies shall be under the control of a user via the settings of the web browser, settings of the information society service and platforms for making such privacy more efficient.
- 

Here is all the necessary information regards Personal Data within so.fa.dog.

## 12. PRIVACY AND PERSONAL DATA

- 12.1 However, we emphasize that so.fa.dog' application is available via third party services (such as App Store, Google Play) and using so.fa.dog needs additional third party services (such as internet connection). This means that your Personal Data may be processed by those third parties and you may learn more about these processing activities from the third party service webpage or by asking the provider of such services directly. If you have a specific question, please do contact us and we will do our utmost to be of assistance.
- 

Here we explain how and when we change this Privacy Policy.

## 13. CHANGES TO THE PRIVACY POLICY

- 13.1 We may change this Privacy Policy. If we make a material change, we'll provide you with reasonable advance notice and the opportunity to review the changes. If you don't agree to the new terms, you should stop using so.fa.dog. You can also end your relationship with us at any time by deleting our applications and services from your devices.

- 13.2 Validity and changes:

Publication	Validity	Main changes
01.05.2020	01.05.2020	Original
23.10.2020	23.10.2020	Major changes and separation of privacy related stipulation to a separate privacy policy

---