

## **PRIVACY POLICY FOR VEBOTEK OÜ FACEBOOK APP - VebotekAdsService**

VEBOTEK OÜ collects some user data required for the operation of VebotekAdsService. Data collected is used solely for better ads management and improving user experience when interacting with managed ads.

Data collected from users may be subject to different protection standards, and broader standards may therefore apply to some. In order to learn more about the protection criteria, Users can refer to the applicability section. This document can be printed for reference by using the print command in the settings of any browser.

### **Owner and Data Controller**

VEBOTEK OÜ

Address: Sepapaja tn 6, 15551, Tallinn, Harju maakond, Estonia

Phone: +443301330617

Owner contact email: [support@vebotek.com](mailto:support@vebotek.com)

### **Types of Data collected**

Among the types of data that VebotekAdsService collects, by itself are data provided by Facebook via permissions: [manage\\_pages](#), [read\\_insights](#), [ads\\_management](#), and [ads\\_read](#).

Complete details on each type of data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the data collection. The Owner collects and processes only data which is received from Facebook permissions [manage\\_pages](#), [read\\_insights](#), [ads\\_management](#), and [ads\\_read](#).

---

## **1. Mode and place of processing the Data**

### **Methods of processing**

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the data.

The data processing is carried out using computers and/or IT-enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the data may be accessible to certain types of persons in charge, involved with the operation of VebotekAdsService like external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications

agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### **Legal basis of processing**

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations, the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### **Place**

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

If broader protection standards are applicable, Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

### **Retention time**

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

### **The purposes of processing**

The data is collected to allow the Owner to:

- Use as a private application for own employees and users which are granted access on Business manager
- Optimize the process of pages and ads management
- Comply with its legal obligations
- Comply with Facebook policy
- Respond to enforcement requests
- Protect its rights and interests
- Detect any malicious or fraudulent activity

---

## **2. Facebook permissions used by VebotekAdsService**

VebotekAdsService may ask for some Facebook permissions allowing it to perform actions with the User's Facebook account and to retrieve information, including Personal Data, from it. This service allows VebotekAdsService to connect with the User's account on the Facebook social network, provided by Facebook Inc. For more information about the following permissions, refer to the [Facebook permissions documentation](#) and to the [Facebook privacy policy](#). The permissions asked are the following:

- **Insights:** Provides read access to the Insights data for pages, applications, and domains.
- **Manage Advertisements:** Provides the ability to manage ads and call the Facebook Ads API.
- **Manage Pages:** Enables the application to retrieve `access_tokens` for Pages and Applications.

## Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

### 1. Access to third-party accounts

This type of service allows VebotekAdsService to access Data from your account on a third-party service and perform actions with it. These services are not activated automatically but require explicit authorization by the User.

### 2. Facebook account access (VebotekAdsService)

This service allows VebotekAdsService to connect with the User's account on the Facebook social network, provided by Facebook, Inc.

Permissions asked: Insights; Manage Advertisements; Manage Pages.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant

### 3. Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

### 4. Facebook Ads conversion tracking (Facebook pixel) (Facebook, Inc.)

Facebook Ads conversion tracking (Facebook pixel) is an analytics service provided by Facebook, Inc. that connects data from the Facebook advertising network with actions performed on VebotekAdsService. The Facebook pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Audience Network.

Personal Data processed: Cookies; Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant

---

## 3. The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

Users entitled to broader protection standards may exercise any of the rights described below. In all other cases, Users may inquire with the Owner to find out which rights apply to them.

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.

- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

#### **Details about the right to object to processing**

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection. Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

#### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

---

## **4. Applicability of broader protection standards**

While most provisions of this document concern all Users, some provisions expressly only apply if the processing of Personal Data is subject to broader protection standards.

Such broader protection standards apply when the processing:

- is performed by an Owner based within the EU;

- concerns the Personal Data of Users who are in the EU and is related to the offering of paid or unpaid goods or services, to such Users;
  - concerns the Personal Data of Users who are in the EU and allows the Owner to monitor such Users' behavior taking place in the EU.
- 

## 5. Additional information about Data collection and processing

### **Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of VebotekAdsService or the related Services. The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

### **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, VebotekAdsService may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

### **System logs and maintenance**

For operation and maintenance purposes, VebotekAdsService and any third-party services may collect files that record interaction with VebotekAdsService (System logs) use other Personal Data (such as the IP Address) for this purpose.

### **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

### **How “Do Not Track” requests are handled**

VebotekAdsService does not support “Do Not Track” requests. To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

---

## 6. Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within VebotekAdsService and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. Should the changes affect processing activities performed

on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

---

**Latest update:** July 31, 2024

Tallinn, Estonia