**1. introduction – Our commitment to Privacy**

Whether you are a User of our Services or just a visitor to our Website, protecting your Privacy is a top priority for GolooGoloo. This Privacy Policy applies where we act as a data controller. That is where GolooGoloo determines the purposes and means of the processing of your personal data. The purpose of this Privacy Policy is to explain how your personal data (“Personal Data”) are protected, what information is processed and how this information is used by GolooGoloo.

This Privacy Policy forms part of the terms of use ( [TOU](https://goloogoloo.co.uk/terms-and-conditions)) of our Website [https://goloogoloo.co.uk](https://www.digitalminds.com/) (hereinafter the “Website”).

We process your Personal Data to offer our Website and to perform the Services under our Services Agreement with you. Furthermore, we may process your Personal Data for statistical purposes, for compliance with our legal obligations and for the legitimate interests we pursue, except where such interests are overridden by your interests or fundamental rights and freedoms. We do not use your Personal Data in any way other than as stated in this Privacy Policy.

To help you understand what “processing of personal data” means, the processing is a term that includes collection, recording, organisation structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data.

We use cookies on our Website. To the degree that those cookies are not strictly necessary for the provision of our Website and Services, we will ask you to consent to our use of cookies when you first visit our Website.

By consenting to this Privacy Policy including our cookies policy, you consent to our processing of your Personal Data in accordance with the terms herein and you accept the practices described herein.

In this Privacy Policy “we”, “us” and “our” refer to GolooGoloo. For more information about us, see section 11.

**2. What information do we process**

We process the following information (collectively “Personal Data”):

**a) Personal information**

Registration is required for the use of our Services. Only registered Users have access to our Platform. You can register through our Website by filling in a registration form. During the registration process, you will be asked to provide us with the following information:

* Your first name
* Your last name
* Your e-mail
* Your phone number
* Your country
* Your address
* Your paypal e-mail
* Your Youtube Channel(s)

Once we receive your registration application, we will create an account for you at the Website (“Account”) and we will e-mail you a link to activate your account. Once you access the link, you will be asked to enter a password. After you have completed activation you will be able to create your profile (“Profile”).

You must state truthfully, accurately and fully your up-to-date Personal Data in the registration process and update your account whenever it is needed. If your Personal Data is not in compliance with these provisions or if GolooGoloo has reasonable suspicions that your Personal Data is not in accordance with these provisions, GolooGoloo has the right to reject your application for registration or to suspend or terminate immediately your Account without prior notice. In this case, you will have no right to any compensation for the rejection of your application, suspension or termination of your Account.

**b) Other information we process**

Website navigation data and IP addresses

We automatically track and collect certain information related to Website navigation data and IP addresses. We use this information to do internal research on our Users’ demographics, interests, and behaviour to better understand, protect and serve you and our community of creators.

Profile information

We may also process information included in your Profile such as your name/surname address, e-mail, phone number, profile pictures, gender, date of birth, relationship or other status, interests and hobbies, educational and employment details.

Activity and behaviour information

We may process information about your activity and behaviour on the Website, such as the upload of your Audiovisual Materials and other information provided in the course of your use of our Website and Services.

Correspondence information

If you send us personal correspondence, such as emails or letters, or if other Users or third parties send us correspondence about your activities on our Website, we may store such information in our servers and process it. Also, we may process information that you provide to us for the purpose of subscribing to our newsletters and/or e-mail notifications.

Payment Information

In order to pay you, we process your payment information such as your IBAN and account information. We do not use your account information in any other way other than for payment purposes. In the event that we use third-party payment vendors, we allow these payment vendors to collect information for the purpose of collecting fees from Users on the Website. We do not have access to the payment information that you provide to these payment vendors and this information is subject to the privacy policy of the payment vendors. For more information regarding what payment information our third-party payment vendors collect and how they use and process this information, please access their privacy policies:

https://www.paypal.com/webapps/mpp/ua/privacy-full

https://transferwise.com/privacy-policy

https://www.skrill.com/en/footer/privacypolicy/

Processing of Personal Data of children

If you are under 16 years old, in order to offer to you our Services directly and to process your Personal Data, we must have consent by your parents or any other person holding the parental responsibility over you. We have the right to request reasonable proof to verify that such consent is given or authorized by your parents or the holder of parental responsibility over you taking into consideration available technology. In case such consent is not given or authorized, GolooGoloo has the right to reject your application for registration and to suspend or terminate immediately your Account without prior notice. In this case, you will have no right to any compensation for the rejection of your application, suspension or termination of your Account.

**c) How do we get your Personal Data**

We process Personal Data we collect ourselves, although in order to perform our Services Agreement with you, we may also process Personal Data in relation to your Audiovisual Materials and Channels that we collect from YouTube. We gain access to these Personal Data when you authorize us to manage your Account, Audiovisual Materials and Channels.

You are requested not to supply any other person’s Personal Data to us unless we prompt you to do so.

**3. How Personal Data is used**

We process your Personal Data in accordance with the EU law and the law of England and Wales.

We use your Personal Data to resolve disputes; troubleshoot problems; help promote your Audiovisual Material; collect fees owed; measure consumer interest in your Audiovisual Material; inform you about offers, products, services, and updates; customize your experience; detect and protect us against error, fraud and other criminal activity; enforce our [TOU](https://goloogoloo.co.uk/terms-and-conditions); and as otherwise described to you in this Privacy Policy.

We use your e-mail to send you system e-mails about the functionality of our Website that you cannot opt out from and you will have to receive if you want to use our Website. If you want to stop receiving our system e-mails, you will have to deactivate your Account. If you wish to do so please send us an e-mail to: office@goloogoloo.com.

We may use your e-mail associated with your Account to send you newsletters and promotions in conjunction with your use of our Services. If you do not wish to receive newsletters anymore, please send us an e-mail to: office@goloogoloo.com.

We may use your information to provide benchmark analysis and aggregate statistics about your Audiovisual Material. This particular information will be anonymized, will not contain personal identification and will not be transferred or sold to third parties in any way or format that identifies you.

We use Website navigation data to operate and improve the Website. We may also use Website navigation data alone or in combination with your Personal Data to provide aggregated information about the use of our Services.

We collect the Internet Protocol (“IP”) addresses to track and aggregate your information when you use our Website. We use IP addresses to monitor the regions from which you navigate our Website and sign-up to use our Services. Your IP address is also registered for statistical purposes and to improve our advertising and layout of the Website.

Insofar as you are a User of our Services, the legal basis for processing your Personal Data as described in this Privacy Policy – unless stated differently herein – is the performance of the Services Agreement between you and us.

Insofar as you are a visitor of our Website, the legal basis for processing your Personal Data as described in this Privacy Policy- unless stated differently herein – is your consent.

In addition, we may process your Personal Data in the following instances:

* where and to the extent such processing is necessary to comply with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of another natural person;
* where and to the extent such processing is necessary in order to establish, exercise or defend legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others;
* where and to the extent such processing is necessary in order to obtain professional advice, to manage risks or to obtain or maintain insurance coverage. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks;
* where and to the extent such processing is necessary in order to perform the Services Agreement between you and us. The legal basis for this processing is the performance of our Services Agreement;

We do not use your Personal Data in any other context other than the one described in our [TOU](https://goloogoloo.co.uk/terms-and-conditions) and this Privacy Policy.

**4. Providing your Personal Data to others**

We may disclose your Personal Data to any member of our group of companies (including our subsidiaries, the ultimate holding company and its subsidiaries) where and to the extent that is reasonably necessary for the purposes, and on the legal bases, set out in this Privacy Policy.

We may disclose your Personal Data to our professional advisers and/or insurers where and to the extent that is reasonably necessary for the purposes of obtaining professional advice and/or managing risks, or for establishing, exercising or defending legal claims, whether in court proceedings or in an administrative or out-of-court procedure or for the purposes of obtaining or maintaining insurance coverage.

Financial transactions relating to our Website and Services are handled by our payment services providerς such as PayPal [URL: <https://www.paypal.com/gr/home> ], TransferWise [URL: <https://transferwise.com/>] and Skrill [URL: <https://www.skrill.com/> ]. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers’ privacy policies and practices at their URL.

Pursuant to complying with our legal obligations we may disclose your Personal Data such as your name/surname, address, country, VAT or other tax registration number, social security number, e-mail address, invoicing, fees and other financial information to tax authorities and other competent authorities.

For the purposes set out in this Privacy Policy, we may also share your Personal Data with third parties (sub-processors, subcontractors, suppliers etc.), who are established in the EU or outside the EU. Any transfer of Personal Data outside the EU will be in accordance with EU law and other applicable law. Third parties with whom we may share your Personal Data (“sub-processors”) are entities who provide storage services (including cloud technologies), logistic services, advertising and promoting services in relation to Audiovisual Materials, clients who may be interested in acquiring Services by you pursuant to our Services Agreement, entities which analyze data in relation to your Audiovisual Materials (statistics, demographics, views preferences, interests, behaviour etc.), entities that provide services in relation to electronic signatures, electronic stamps etc.

In addition, we must reserve the right to make certain disclosures of Personal Data in circumstances where it is necessary to comply with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your Personal Data where such disclosure is necessary to establish, exercise or defend legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

We also reserve the right to share your Personal Data with a third party in case of sale merger, control changes, reorganization or liquidation of our company or any member of our group of companies (including our subsidiaries, the ultimate holding company and all its subsidiaries).

All actions according to this section 4, will be completed in compliance with applicable laws of personal data and Privacy.

**5. How your information is protected**

GolooGoloo uses robust security measures to protect data from unauthorized access, maintain data accuracy, and help ensure the appropriate use of data. When the Services are accessed using the internet, Secure Socket Layer (SSL) technology protects your Personal Data. This technology helps ensures that your Personal Data is safe, secure, and only available to you and to whom you have granted access. GolooGoloo also implements other advanced technology measures to prevent interference or access from outside intruders.

All our employees, independent contractors and agents have executed non-disclosure agreements, which provide explicit confidentiality protections. Any employee, independent contractor or agent who violates such privacy and/or security policies is subject to possible termination and civil and/or criminal prosecution.

GolooGoloo’ software runs on Youtube servers and please refer to Youtube’s TOU and Privacy Policy. If, however, we share your Personal Data with third parties other than as stated in this Privacy Policy, we will notify you. Please note that no transmission over the internet can guarantee confidentiality and non-disclosure, and as such, you transmit at your own risk.

GolooGoloo does its utmost to secure communications and data storage in order to protect the confidentiality of your Personal Data against loss and interception by third parties. However, it is important to know that there is no zero risk against loss or interception by others of your Personal Data. You are responsible for maintaining the security and confidentiality of your Account’s username and password.

We do not tolerate Spam. To report GolooGoloo -related spam, please contact us at office@goloogoloo.co.uk . You may not use our communication tools to send spam or otherwise send content that would violate our [TOU](https://goloogoloo.co.uk/terms-and-conditions) . We may check for spam, viruses, phishing attacks and other malicious activity or illegal or prohibited content of the Website, but we will not permanently store messages sent through these tools.

You acknowledge that Personal Data that you submit for publication through our Website and/or on Youtube and/or on other digital platforms and media may be available, via the internet, around the world. GolooGoloo cannot prevent the use or misuse of such Personal Data by others. This also applies to any statistical information about your Audiovisual Materials which is publicly available. You may ask GolooGoloo to terminate your Account and thus, disable access to your Personal Data at any time, however, you acknowledge that any third-party that has previously gained access to Personal Data and/or statistical information as above, may have retained a copy.

**6. How Personal Data is stored / Retention and Deletion Policies and Procedures**

The Personal Data we process for any purpose or purposes, shall not be stored for longer than is necessary for that purpose or those purposes.

Personal Data that we process for the purpose of performing the Services Agreement between you and us will be stored for the term of our Services Agreement.

Where it is not possible for us to specify in advance the periods for which your Personal Data will be retained, we will determine the period of retention based on the purpose of processing the Personal Data in each instance.

Notwithstanding the other provisions of this Section 6, we may retain your Personal data where such retention is necessary for the following purposes:

(a)for statistical purposes;

(b)to comply with a legal obligation to which we are subject (including but not limited any obligation imposed by tax or other competent authority), such retention to continue only as long as it is necessary until the relevant obligation is fulfilled;

(c)where and to the extent such retention is necessary to establish, exercise or defend legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this retention is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others and the retention will continue only as long as it is necessary until the relevant procedures are completed or any such claim is resolved amicably;

**7. Your rights**

Under data protection law you have certain rights in relation to your Personal Data. In this section 7, you will find a summary of those rights. Given the complexity of some of the rights, not all the details have been included in our summary. In this respect, we strongly encourage you to read the relevant laws [especially articles 12-23 of the General Data Protection Regulation 2016/679 of the European Parliament and of the Council of April 27th, 2016 on the protection of natural persons with regard to the processing of personal data and the free movement of that data (the “GDPR”)] for a full explanation of these rights.

**Your principal rights under data protection law are:**

**(i)** **the right to access;**

**(ii)** **the right to rectification;**

**(iii)** **the right to erasure (‘right to be forgotten);**

**(iv)** **the right to restrict processing;**

**(v)** **he right to data portability;**

**(vi)** **the right to object to processing;**

**(vii)** **the right to complain to a supervisory authority; and**

**(viii)** **the right to withdraw your consent.**

**(i)** **The right to access:** You have the right to confirmation as to whether or not we process your Personal Data and, where we do, access to the Personal Data that are processed, together with some additional information that include: (a) details of the purposes of the processing, (b) the categories of Personal Data concerned and the recipients or the categories of recipients of your Personal Data, (c) the periods your Personal Data are retained or the criteria upon which such periods are determined, (d) your rights under (ii), (iii), (iv), (v) and (vii), (e) when your Personal Data are collected by third parties, details as to their source, guarantees in relation to international transfers of your Personal Data etc.

Providing that the rights and freedoms of others are not affected, we will supply to you a copy of your Personal Data. The first copy will be provided to you free of charge, but additional copies may be subject to a reasonable fee. For a copy of your personal Data please send us a written notice to this e-mail: office@goloogoloo.com

**(ii)** **The right to rectification:** In case of any inaccurate Personal Data about you, you have the right to request that the inaccurate Personal Data is rectified. Taking into account the purposes of the processing, you have the right to request that any incomplete Personal Data about you is completed.

**(iii)** **The right to erasure (‘right to be forgotten’):** In some circumstances you have the right to request the erasure of your Personal Data without undue delay. Those circumstances include: (a) the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (b) you withdraw consent to consent-based processing; (c) you object to the processing under certain rules of applicable data protection law; (d) the processing is for direct marketing purposes; and (e) the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary (a) for exercising the right of freedom of expression and information; (b) for compliance with a legal obligation; or (c) for the establishment, exercise or defense of legal claims.

**(iv)** **The right to restrict processing:** In some circumstances, you have the right to restrict the processing of your Personal Data. Those circumstances are: (a) you contest the accuracy of the Personal Data; (b) processing is unlawful but you oppose erasure; (c) we no longer need the Personal Data for the purposes of our processing, but you require Personal Data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your Personal Data, however, we will only otherwise process the Personal Data with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

**(v)** **The right to data portability:** You have the right to receive your Personal Data in a structured, commonly used and machine-readable format and to transmit those Personal Data to another data controller without hindrance from us where: (a) the legal basis for our processing is consent or the performance of a contract between you and us, and (b) the processing is carried out by automated means.

In addition, where technically feasible, you have the right to request that your Personal Data are transmitted directly to the other controller.

This right to data portability shall not apply to processing that is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us. Furthermore, this right to data portability may not adversely affect the rights and freedoms of others.

**(vi)** **The right to object to processing:** You have the right to object to our processing of your Personal Data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the Personal Data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

In addition, you have the right to object to our processing of your Personal Data in the following instances:

– When the processing of your Personal Data is made for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your Personal Data for this purpose.

– for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

To the extent that the legal basis for our processing of your Personal Data is: (a) consent; or

(b) that the processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your Personal Data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

**(vii)** **The right to complain to a supervisory authority:** If you consider that our processing of your Personal Data infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

**(viii)** **The right to withdraw your consent:** To the extent that the legal basis for our processing of your Personal Data is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to your Personal Data by written notice to us sent to the following e-mail: office@goloogoloo.com or by using our website contact form [https://goloogoloo.co.uk/contact].

**8. Cookies**

**Introduction**

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either “persistent” cookies or “session” cookies. A persistent cookie will be stored by a web browser and will remain valid until its set expiry date unless deleted by the user before the expiry date, whereas a session cookie will expire at the end of the user session when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Cookies used by us

We are using cookies to improve your experience of our Website. These cookies help us to analyze the use and performance of our Website and Services. When you visit our Website, our servers send a cookie to your computer to determine your location and use the appropriate language for our Services. You can delete these cookies at any time. Standing alone, cookies do not personally identify an individual. Cookies merely recognize the web browser. Unless an individual chooses to identify himself/herself to GolooGoloo, such as through opening an Account or entering login information, individuals remain anonymous to us.

Cookies used by our service providers

Our service providers use cookies and those cookies may be stored on your computer when you visit our Website.

For example, we use Google Analytics to analyze the use of our Website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our Website is used to create reports about the use of our Website. Google’s privacy policy is available at: <https://www.google.com/policies/privacy/>.

Blocking cookies

Blocking all cookies may have a negative impact on the usability of many websites and if you block cookies, you may not be able to use all the features on our Website. However, most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version.

**9. Legal requests**

We cooperate with the supervisory authorities that are responsible for data protection as well as with law enforcement authorities, judicial authorities and other third parties, to enforce laws, intellectual property rights and to prevent fraud. In response to a verified request by law enforcement, judicial or other government officials relating to a criminal investigation or alleged illegal activity, we can, and you authorize us to, disclose your name, e-mail address and Website use history, with or without a subpoena. Without limiting the above, we will not disclose your Personal Data to any law enforcement or other government officials without a subpoena or court order, except when we believe in good faith that the disclosure of the information is necessary to protect our rights, enforce our policies, respond to claims that your use of our Services violates GolooGoloo policies or rights of others, or protect anyone’s rights, property or safety.

**10. Links to Other Sites**

Our Website may contain links to other Websites that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other Websites. We encourage you to be aware when you leave our Website and to read the privacy policies of each and every Website that processes personal information. This Privacy Policy applies only to your Personal Data processed by us.

**10. Changes**

We may update this Privacy Policy from time to time by publishing a new version on our Website. The updated Privacy Policy will be effective immediately as of the date it is posted unless otherwise stated in the change provision. You should check this page occasionally to ensure you are happy with any changes to this policy. We will notify you of significant changes to this policy by email or through the private messaging system on our Website.

**11. Our details**

This Website is owned and operated by GolooGoloo Ltd.

GolooGoloo Ltd. is a limited company incorporated under the laws of England and Wales, registered address: 3000 Aviator Way, Manchester Business Park the United Kingdom, M22 5TG with Reg. No 13534978.

You can contact us:

* by email, using the following email: office@goloogoloo.com
* using our website contact form [ <https://goloogoloo.co.uk/contact>]
* by telephone, on the contact number published on our Website from time to time
* by post, to the postal address given above;