

# PRIVACY POLICY

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### Processing of personal data using social media or platforms

1. Please be advised that the Controller runs or can run a fanpage(s) on social media or platforms,
2. Please be noted that the Controller is responsible for the processing of personal data only to the extent to which he decides about the purposes and means of processing personal data via the fanpage,
3. Please be advised that using the above-mentioned fanpage, information on the processing of personal data is available at the following links:

No.	Entity name	Link to the privacy information
1.	Facebook	<a href="https://www.facebook.com/legal/terms">https://www.facebook.com/legal/terms</a>
2.	LinkedIn	<a href="https://www.linkedin.com/legal/user-agreement">https://www.linkedin.com/legal/user-agreement</a>
3.	Twitter	<a href="https://twitter.com/en/tos#intlTerms">https://twitter.com/en/tos#intlTerms</a>
4.	YouTube	<a href="https://www.youtube.com/t/terms">https://www.youtube.com/t/terms</a>
5.	VK	<a href="https://connect.vk.com/privacy">https://connect.vk.com/privacy</a>
6.	Discord	<a href="https://discord.com/privacy">https://discord.com/privacy</a>
7.	Instagram	<a href="https://help.instagram.com/519522125107875/?helpref=uf_share">https://help.instagram.com/519522125107875/?helpref=uf_share</a>
8.	Steam	<a href="https://store.steampowered.com/privacy_agreement/?l=english">https://store.steampowered.com/privacy_agreement/?l=english</a>
9.	TikTok	<a href="https://www.tiktok.com/legal/page/us/privacy-policy/en">https://www.tiktok.com/legal/page/us/privacy-policy/en</a>

### Information about Joint controllers

#### The joint controllership with Facebook

No.	Concerns	Fulqrum Publishing Limited Information about joint controllership	Facebook Ireland Limited Information about joint controllership
1.	Controller	Fulqrum Publishing Limited, 27, 25 Martiou Str., D. MICHAEL TOWER, Office 105A, Engomi, 2408, Nicosia, Cyprus ,Tax No.:	Facebook Ireland Limited, with its registered office at 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland

		CY10268076B, Register No.: HE268076	
2.	Common arrangements	Joint controllers' common arrangements: <a href="https://www.facebook.com/legal/controller_addendum">https://www.facebook.com/legal/controller_addendum</a>	Joint controllers' common arrangements: <a href="https://www.facebook.com/legal/controller_addendum">https://www.facebook.com/legal/controller_addendum</a>
3.	Data Protection Officer (DPO)	The Controller did not appoint the Data Protection Officer. Inquiries regarding the protection of personal data should be directed to the Controller by traditional mail to the Controller's address or by e-mail to the following address <a href="mailto:DPO.CY@fulcrumpublishing.com">DPO.CY@fulcrumpublishing.com</a> .	Contact details to the Data Protection Officer: <a href="https://www.facebook.com/privacy/explanation">https://www.facebook.com/privacy/explanation</a>
4.	Supervisory authority	Office of the Commissioner for Personal Data Protection: <a href="http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/contact_en/contact_en?opendocument">http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/contact_en/contact_en?opendocument</a>	Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland: <a href="https://www.dataprotection.ie/">https://www.dataprotection.ie/</a>

#### The joint controllership with **Instagram**

No.	Concerns	<b>Fulcrum Publishing Limited</b> Information about joint controllership	<b>Facebook Ireland Limited</b> Information about joint controllership
1.	Controller	Fulcrum Publishing Limited, 27, 25 Martiou Str., D. MICHAEL TOWER, Office 105A, Engomi, 2408, Nicosia, Cyprus, Tax No.: CY10268076B, Register No.: HE268076	Facebook Ireland Limited, with its registered office at 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland
2.	Common arrangements	Joint controllers' common arrangements: <a href="https://www.facebook.com/legal/controller_addendum">https://www.facebook.com/legal/controller_addendum</a>	Joint controllers' common arrangements: <a href="https://www.facebook.com/legal/controller_addendum">https://www.facebook.com/legal/controller_addendum</a>
3.	Data Protection Officer (DPO)	The Controller did not appoint the Data Protection Officer. Inquiries regarding the protection of personal data should be directed to the Controller by traditional mail to the Controller's address or by e-mail to the following address <a href="mailto:DPO.CY@fulcrumpublishing.com">DPO.CY@fulcrumpublishing.com</a> .	Contact details to the Data Protection Officer: <a href="https://www.facebook.com/privacy/explanation">https://www.facebook.com/privacy/explanation</a>
4.	Supervisory authority	Office of the Commissioner for Personal Data Protection: <a href="http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/contact_en/contact_en?opendocument">http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/contact_en/contact_en?opendocument</a>	Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland: <a href="https://www.dataprotection.ie/">https://www.dataprotection.ie/</a>

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## The joint controllership with **LinkedIn**

No.	Concerns	<b>Fulqrum Publishing Limited Information about joint controllership</b>	<b>Facebook Ireland Limited Information about joint controllership</b>
1.	Controller	Fulqrum Publishing Limited, 27, 25 Martiou Str., D. MICHAEL TOWER, Office 105A, Engomi, 2408, Nicosia, Cyprus, Tax No.: CY10268076B, Register No.: HE268076	Facebook Ireland Limited, with its registered office at 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland
2.	Common arrangements	Joint controllers' common arrangements: <a href="https://legal.linkedin.com/pages-joint-controller-addendum">https://legal.linkedin.com/pages-joint-controller-addendum</a>	Joint controllers' common arrangements: <a href="https://legal.linkedin.com/pages-joint-controller-addendum">https://legal.linkedin.com/pages-joint-controller-addendum</a>
3.	Data Protection Officer (DPO)	The Controller did not appoint the Data Protection Officer. Inquiries regarding the protection of personal data should be directed to the Controller by traditional mail to the Controller's address or by e-mail to the following address <a href="mailto:DPO.CY@fulqrumpublishing.com">DPO.CY@fulqrumpublishing.com</a> ,	Contact details to the Data Protection Officer: <a href="https://www.linkedin.com/legal/privacypolicy?src=direct%2Fnone&amp;veh=direct%2Fnone">https://www.linkedin.com/legal/privacypolicy?src=direct%2Fnone&amp;veh=direct%2Fnone</a>
4.	Supervisory authority	Office of the Commissioner for Personal Data Protection: <a href="http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/contact_en/contact_en?opendocume&lt;br/&gt;nt">http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/contact_en/contact_en?opendocume nt</a>	Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland: <a href="https://www.dataprotection.ie/">https://www.dataprotection.ie/</a>

## Transferring personal data to a third country

- Please be advised that personal data may be transferred to a third country, i.e. outside the EEA. In the event of transferring personal data outside the European Economic Area, such transfer may only take place on the terms set out in Chapter V of the GDPR:
  - pursuant to art. 45 GDPR - transfer based on an adequacy decision,
  - pursuant to art. 46 GDPR - transfer subject to appropriate safeguards, including the use of standard data protection clauses adopted by the European Commission,
- We hereby inform that the transfer of personal data outside the EEA may involve the risk of not ensuring sufficient security of personal data. In the event of a risk related to the

transfer of personal data outside the EEA, the Controller provides such information in this Privacy Policy,

3. Please be advised that the list of entities outside the EEA to which the Controller discloses personal data is available at the request of the data subject,
4. List of entities that may transfer personal data outside the EEA, which may not provide sufficient protection of personal data provided for in the GDPR:

No.	The name of the entity	Link to information	The risk related to the transfer of data outside the EEA and the negative effects that may arise for the data subject
1.	Facebook	<a href="https://www.facebook.com/legal/terms">https://www.facebook.com/legal/terms</a>	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,
2.	LinkedIn	<a href="https://www.linkedin.com/legal/user-agreement">https://www.linkedin.com/legal/user-agreement</a>	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,
3.	Twitter	<a href="https://twitter.com/en/tos#intlTerms">https://twitter.com/en/tos#intlTerms</a>	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,
4.	YouTube	<a href="https://www.youtube.com/t/terms">https://www.youtube.com/t/terms</a>	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,
5.	Google	<a href="https://policies.google.com/terms?hl=en&amp;gl=be">https://policies.google.com/terms?hl=en&amp;gl=be</a>	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,
6.	Google Maps	<a href="https://www.google.com/intl/en_be/help/terms_maps/">https://www.google.com/intl/en_be/help/terms_maps/</a>	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR,

			4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,
7.	TikTok	<a href="https://www.tiktok.com/legal/page/us/privacy-policy/en">https://www.tiktok.com/legal/page/us/privacy-policy/en</a>	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,