

## **Privacy policy**

### **Who are we**

#### **GENERAL INFORMATION**

"IDEA LAB" Ltd. (hereinafter referred to as the "Company", "We", "Our") is a commercial company established and operating under the Bulgarian and the European legislation. The Company carries out its business by concluding business transactions through the website [www.giftcometrue.bg](http://www.giftcometrue.bg) and its English version [en.giftcometrue.com](http://en.giftcometrue.com), hereinafter referred to as the "Site" and the "Website". "IDEA LAB" Ltd. thanks you for visiting its website and for your interest in the company and its offers. We take the protection of your personal data seriously and want you to feel comfortable when visiting our websites.

Herein below we will provide you with information about your data we store when you use our website and how we use such data. If our website contains any links to a third-party website, our Privacy Policy is not applicable to the relevant third-party website.

By accepting the following Privacy Policy, you agree to the collection, processing and use of your personal data by the Company in compliance with the Data Protection Act, Regulation (EC) 2016/679 - General Data Protection Regulation (GDPR) and these conditions.

This document only applies to the processing of your personal data that has been collected, stored, or processed in a lawful way during your visit and use of the following websites with addresses /domains/ [www.giftcometrue.bg](http://www.giftcometrue.bg) and [www.giftcometrue.com](http://www.giftcometrue.com) and for the services we provide, which can be purchased from the abovementioned websites.

Please, take time to carefully read this clarification.

#### **PERSONAL DATA CONTROLLER**

IDEA LAB Ltd. operates in compliance with Regulation (EC) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation (GDPR)) and the other European and Bulgarian statutory regulations for personal data protection. Upon processing your personal data, the Company complies with the following principles:

- legality, fairness and transparency;
- limitation of processing purposes;
- relevance of processing purposes and minimization of collected data;
- accurate and kept up to date data;
- restriction of data retention in view to achieving the purposes;
- integrity and confidentiality of the processing, and ensuring an adequate level of personal data security.

The Personal Data Controller is the person responsible for the processing of your personal data and the one who makes decisions about the purposes and means of processing your personal data.

In this case, the Personal Data Controller (PDC) is:

Company Name: IDEA LAB LTD.

UIC: 204864275

Registered address: Republic of Bulgaria, Sofia, 1404, Triaditsa Region, 111 Bulgaria Blvd., building F1, 1st floor

tel.: 0878690225

e-mail: office@giftcometrue.com

"IDEA LAB" Ltd. is registered as a personal data controller with identification number 434436 in the public register of PDC with the CPDP, according to the requirements of the Bulgarian legislation in the field of personal data protection in force up until 25.05.2018.

You can contact our data protection officer at the following e-mail: office@giftcometrue.com

If you wish to object to the collection, processing or use of your personal data by IDEA LAB LTD. in accordance with the GDPR and the Personal Data Protection Act, you may submit your objection by e-mail to the abovementioned addresses. This may result in an impossibility to use the websites and services provided to the clients of the company through them.

Due to your objection, any further use of the website may be impossible for technical reasons.

### **Your rights**

You have the right to receive explicit, free of charge information from our Company about your personal data stored by us.

You also have the following rights:

- Right of access - Right to know what data has been collected and how it is processed
- Right to rectification - Right to request a change of your personal data if it is not up to date

- Right to erasure - Right to request deletion of your personal data
- Right to restrict processing - Right to restrict the processing of your personal data
- Data portability right - Right to transfer your personal data in a machine readable format
- Right to object - Right to withdraw your consent or subject of the personal data processing

• Right to lodge a complaint with the supervisory authority - Right to file a complaint against the company to a supervisory body, which may be either the responsible authority of IDEA LAB LTD., as indicated below, or another competent authority within the EU.

The responsible supervisory body of IDEA LAB Ltd. is:

Commission for Personal Data Protection (CPDP)

Republic of Bulgaria, city of Sofia, 1592, Prof. 2 Tsvetan Lazarov St.

E-mail: kzld@cpdp.bg

Website: [www.cpdp.bg](http://www.cpdp.bg)

You can also submit your complaint to the supervisory body of your place of residence or place of work.

If you wish to exercise your rights as a data subject, please do not hesitate to contact us using the contact information above.

### **When, how and why we collect your data**

In order to be able to offer you our services, we must collect, process, store and share various personal data. Below you can see which of your data we need, for what purposes and under what circumstances we share it with others.

"Personal data" within the meaning of Art. 4 (1) of the GDPR means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is a person who can be identified, directly or indirectly, in particular by an identifier such as

name, identification number, location data, online identifier or based on one or more signs specific to the physical, physiological, genetic, mental, psychological, economic, cultural or social identity of that individual;

Personal data represents information directly or indirectly related to your identity, such as name and surname, address, telephone number, date of birth, location data, address, e-mail address, IP address or other information that may lead to the identification of an individual. Please provide us only with the information we need.

Since we want to give you a good overview of the details, we will use a table form. We believe that this will enable us to provide you with the information in a clear, understandable and easily accessible form in a clear and simple language.

Below we would like to show you which of your data we collect. Since there are different types of data, we have grouped them into data categories, because we believe that thus the information would be more understandable.

#### **PERSONAL DATA WE COLLECT WHEN YOU ARE VISITING OUR WEBSITE**

When you open our website but do not register or make an order as a guest, we collect the following personal data:

Data categories	Explanation
<b>Device information</b>	Device identification number, operating system and the relevant version or other device identifiers
<b>Connection data</b>	Time, date and duration of the use of the website, origin, the relevant IP address and other protocol data

This information is collected to visualize the website in a proper way. We are also limited to what is absolutely necessary to ensure that we comply with the principle of data processing, namely the minimization of data collection.

#### **PERSONAL DATA WE COLLECT WHEN YOU VISIT AND REGISTER TO OUR WEB SITE**

All data collected is strictly bound to clearly defined purposes. If you visit the website, but also want to sign up as a registered user, we will collect the following personal data:

Data categories	Explanation
<b>Data access</b>	Username and password
<b>Device information</b>	Device identification number, operating system and the relevant version or other device identifiers
<b>Connection data</b>	Time, date and duration of the use of the website, origin, the relevant IP address and other protocol data
<b>Communication data</b>	Comments, assessments and reactions, communication data (for example, email messages)

<b>Other information</b>	Data you provide voluntarily, while using the website, the application or the related activities, but also from other sources, such as social media or other (public) databases (for example, user ID of other platforms)
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## **PERSONAL DATA WE COLLECT WHEN YOU VISIT, REGISTER AND ORDER FROM OUR WEBSITE**

In order to take advantage of all the benefits we offer, you can register and place your order or place an order without pre-registration on the site. As you can imagine, most data will be collected based on the information you provide. Fields required for order processing, are mandatory. Without such information we cannot process and execute your orders. Any other information, which is not marked as a mandatory field, is optional. If you voluntarily provide us with such information, you will help us improve our services provided to you. However, omitting this information will not have a negative impact on you. The degree depends on the information you provide. However, the basic information is as follows:

<b>Data categories</b>	<b>Explanation</b>
<b>Data access</b>	username, password
<b>Profile information (needed for the delivery and payment services)</b>	Personal, family name, company name (at your discretion); delivery address; telephone number and/or email address; payment address, if other than the delivery address.
<b>Communication data</b>	Comments, assessments and reactions, communication data (for example, email messages)
<b>Connection data</b>	Time, date and duration of the use of the website, origin, the relevant IP address and other protocol data
<b>Device information</b>	Device identification number, operating system and the relevant version or other device identifiers, geolocation data
<b>Order information</b>	Order history
<b>Other information</b>	Data you provide voluntarily, while using the website, the application or the related activities

If you provide us with personal data of another person, you must first obtain the consent of that person. In this case, you should inform such individual about how we process personal

data in accordance with our Privacy Policy. The provision of personal data of natural persons other than you, is your sole responsibility.

## **PERSONAL DATA OF SERVICE USERS WHO DO NOT ORDER THE SERVICE BUT ARE ONLY ITS USERS**

If you are only the user of the service (another person has ordered the service and gave you a voucher), we process the following data belonging to you, which were provided by the third party, who ordered the service and provided us with the personal data:

- Name and surname
- Address and phone when the service has to be delivered by post or courier service
- E-mail address
- Other details upon request from us through the order form /phone / e-mail, without which the ordered service cannot be rendered.

## **WHAT ARE THE DEFINED PURPOSES AND WHAT ARE THE LEGAL GROUNDS?**

As we already informed you above, we collect your personal data only when necessary and when the purpose is legal and pre-determined. The information in (brackets) is the legal basis for the relevant processes. Below we would like to provide you with more information on the purposes and legal basis:

<b>Purpose</b>	<b>Why do we process data for this purpose</b>
<b>Customer support</b>	When contacting our Customer Service Department in order to receive information or submit a complaint, we store the information you provide us. For example, the reason to contact us, the order you do not like or the delivery missing. Depending on the reason for contacting us, the personal information may vary. Since we want to improve our services for you, we keep the communication. Thus, we can answer your questions more quickly and more satisfactorily. <b>Personal data category:</b> Profile information Data access Communication data Other information <b>Legal grounds:</b> This information is required to complete the orders and deliver the service you ordered (performance of the contract).

	<p>(performance of the contract). However, it is also in our business interest to provide you with the best service (legitimate interest and lawful distance contract performance).</p>
<b>Orders and delivery</b>	<p>After you place your order, some processes are run in the background. We save your order in your account, depending on whether you are a registered customer or a guest. Your order is processed and we send information about the service voucher ordered to the respective vendor of the ordered voucher service</p> <p><b>Personal data category:</b></p> <ul style="list-style-type: none"> <li>Data access</li> <li>Profile information</li> <li>Connection data</li> <li>Communication data</li> <li>Device information</li> <li>Order information</li> <li>Other information</li> </ul> <p><b>Legal grounds:</b></p> <p>For the delivery of the service on the ordered voucher, it is necessary to inform our partners and in this regard we need your personal data (performance of a contract).</p>
<b>Security and protection</b>	<p>We want to offer the best service to you and all our customers. Unfortunately, not every visitor of our website is as friendly as you are. For this reason, in order to protect our services, we need to collect personal data that helps us identify any potential offenders and thus avoid risks. We also keep a note of the fact that we have informed you about the Privacy Policy. For this purpose, we note in your account that you have received the relevant information and that the Privacy Policy has been provided to you.</p> <p><b>Personal data category:</b></p> <ul style="list-style-type: none"> <li>Connection data</li> <li>Data access</li> </ul> <p><b>Legal grounds:</b></p>

	We are legally obliged to protect your data in an appropriate manner (compliance with legal obligations) and the protection of our company is in our best interest (legitimate interest).
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## FURTHER PROCESSING BASED ON LEGITIMATE INTEREST

In addition to the above-mentioned purposes and legal grounds, we process your personal data for our so-called legitimate interests. Generally, the legitimate interest is, for example, the processing of personal data within a group of companies, network and information security processes or direct marketing activities.

We use your personal data to protect our legitimate interests, provided that your rights and freedoms do not have priority. In order to reconcile our interests with your rights, we have implemented appropriate control mechanisms. The processes below undergo a quadruple test to ensure that your rights and freedoms are not affected by our processing. As part of the quadruple test, we first verify that the collected data is personal data (a. Personal data test). Then we check if the purpose is legitimate (b. Purpose test) and whether the personal data to be collected comply with the principles of data processing (c. Necessity Test) and finally balance of interests (d. Balance Test). Only if we can reasonably accept and also ensure that we can protect your data from risks, we will process them on the legal grounds of our legitimate interest. These processes include:

Process based on legitimate interest	Explanation
<b>Advertising</b>	We will send you emails to offer you coupons, discounts and promotions, conduct public opinion polls and other research to improve our service. You can object to the further processing of the data for advertising purposes with each email. Of course, you can also contact our Data Protection Officer directly at <a href="mailto:office@giftcometrue.com">office@giftcometrue.com</a> if you would like to oppose to the processing of the data for advertising purposes or for further information on that matter.
<b>Email marketing</b>	We want to prevent generated bulletins and uncontrolled marketing measures. Therefore, we choose offers that match your interests and we will contact you if we believe that you may like the information. You can object to any further processing of the data for advertising purposes with any email. Of course, you can also contact our Data Protection Officer directly at <a href="mailto:office@giftcometrue.com">office@giftcometrue.com</a> if you would like to oppose to the processing of the data for advertising purposes or for further information on that matter.

<b>Measuring data</b>	To improve our services, we will collect different measurement data, other than you or your account. This helps us optimize our ads.
<b>Merger and acquisition, change in ownership</b>	We would also like to inform you that in the event of a merger or acquisition by another company, we will disclose information about that company. Of course, we will require the company to comply with the data protection regulations.
<b>Other information</b>	We will be happy if you voluntarily decide to share with us information that goes beyond the mandatory information. This way we can continue to improve our services. This includes data you provide voluntarily when you use our website, our apps, but also information from other sources, such as social media or other (public) databases (e.g., user IDs on other platforms).
<b>Quality assessment</b>	To continually offer better services, we regularly assess the success or the potential causes of unsuccessful marketing measures. For example, we analyze whether our newsletters are opened and whether you click on the content.

### **When do we delete your data?**

Normally, we delete your data once the purpose is achieved. We apply different deletion rules depending on the purpose of processing. Within our deletion policy, we have defined different classes of data and rules for the specified deletion periods. The collected data is marked with a deletion rule. When the storage period expires, the stored data will be deleted accordingly.

We will delete your personal information if you wish and let us know about it, or ten years after collection.

In addition to the deletion rules we have set, there are other storage periods that we also have to observe. For example, tax data should be kept for a period of six to ten years or, in some cases, even longer. These special retention periods vary according to the local legal requirements.

Therefore, despite your request for erasure of your data, we may need to keep some of the data stored due to the legal regulations. In this case, however, we will restrict the data from further processing.

### **Who we share your data with**

In the next section, we'd like to let you know who and under what conditions we'll transfer your data. In addition, we would like to be transparent with respect to the parties to which we transfer your data.

### **WHICH THIRD PARTIES HAVE ACCESS TO PERSONAL DATA**

We never provide your data to unauthorized third parties. As part of our operations, however, we receive services from selected service providers and provide them with limited

and strictly controlled access to some of our data. All data recipients must comply with the legal data protection requirements and have declared the above.

Below we would like to inform you in a transparent and comprehensible manner about all data recipients for the following reasons:

Data recipient	Reason
<b>SHOPIFY INC. Canada</b>	<p>Our store is hosted by Shopify Inc., an online trading platform for trading products and services. Your data is kept by Shopify's data storage, databases and the main Shopify application.</p> <p>Shopify Inc., Canada's Privacy Policy can be found at <a href="https://www.shopify.com/legal/privacy">https://www.shopify.com/legal/privacy</a></p> <p>Payment: If you choose a direct payment, Shopify stores the data for the payment with your credit card. It is encrypted using the Payment Card Industry Data Security Standard (PCI-DSS). Transaction data is stored only as needed for the purchase transaction, and are then deleted.</p> <p>All direct payment gateways are PCI-DSS standardized and managed by the PCI Security Standards Council, a joint branding system such as Visa, Mastercard, American Express and Discover.</p> <p>PCI-DSS requirements help secure the information related to payments to us made with your credit card.</p> <p>For more information, read Shopify's Terms of Service (<a href="https://www.shopify.com/legal/terms">https://www.shopify.com/legal/terms</a>) or the Privacy Statement</p>
<b>External service provider</b>	As mentioned above, we communicate with external service providers who deliver the service materialized in the voucher. Other companies support our business operations in assessing and optimizing our business processes or marketing campaigns, but also in providing personalized advertising, providing IT solutions and infrastructure, or securing our business operations, such as identifying and resolving malfunctions.
<b>State law enforcement bodies – police, prosecution, courts</b>	Unfortunately, it may happen that some of our customers and service providers are not behaving lawfully and / or want to hurt us. In these cases, we are not only required to submit personal data due to our legal obligations, but also in our interest to prevent damage and to protect our claims and to reject unjustified claims.

#### TO WHICH COUNTRIES DO WE TRANSFER YOUR DATA

We process your data primarily within the European Union (EU) and the European Economic Area (EEA). However, some of the above service providers may be based outside the EU and EEA.

The GDPR has high requirements for the transfer of personal data to third countries. All our data receivers must comply with these requirements. Before transferring the data to a service provider in a third country, each service provider is first assessed with regard to its level of data protection. Only if they can prove an adequate level of data protection will they be included in our list of service providers.

Whether the service providers are located within the EU / EEA or in third countries, each service provider must undertake to carry out lawful data processing for us. Non-EU / EEA service providers must meet additional requirements. According to Art. 44 ff. of the GDPR personal data may be transferred to service providers that meet at least one of the following requirements:

- The Commission has decided that the third country guarantees an adequate level of protection (eg. Israel and Canada)

- Standard data protection clauses have been adopted:

These are contractual clauses that cannot be changed by the contracting parties and by which they undertake to ensure an adequate level of data protection.

- Approved certification mechanism:

Pursuant to the international agreements, companies can be certified according to certain criteria. One of these certificates is the EU-US Data Protection Agreement. You can check out the certified companies at the following address:  
<https://www.privacyshield.gov/welcome>

We will only transfer your data to service providers that meet at least one of these requirements. If we transfer data to third countries, these are mainly companies based in the United States and Canada.

## **Information about our cookies**

### **DEFINITION OF "COOKIES" AND THE "COOKIES" WE USE**

In order to make your visit to our website attractive and allow the use of certain features, we use the so-called "cookies" on different pages. These are small text files stored on your device. Some of the cookies we use are deleted after the end of the browser session, after closing your browser (so-called session cookies). Other cookies remain on your device and allow us or our partner to recognize your browser on your next visit (permanent cookies). You can set up your browser so that you are aware of the cookie setting and decide to accept it individually or turn off the acceptance of cookies for specific cases or in general. Not accepting cookies may limit the functionality of our website.

### **WHAT CATEGORIES OF "COOKIES" ARE THERE?**

**Strictly necessary cookies** are needed to browse a website and use its features. Without these cookies, the functionality cannot be guaranteed, such as actions taken during the visit (for example, text input), even when you navigate between pages of the site.

**Functional cookies** allow the website to store the information already provided (such as username, language or location) and improve the user's ability to propose personal features. These cookies collect anonymous information and cannot track your movements on other websites.

**Performance cookies** collect information about using a website - for example, which pages are most often visited by a certain visitor and whether he receives error messages from a page. These cookies do not store information that allows the user to be identified. The collected information is generalized and anonymous. These cookies are used exclusively to improve the performance of a website and thus the users' experience.

**Cookies for marketing purposes** are used for more targeted advertising that is relevant to the consumer and adapted to his or her interests. They are also used to limit ad frequency and measure ad campaign performance. They register whether you have visited a website or not. This information can be shared with third parties (e.g., advertisers). Improving of targeting and advertising cookies are often related to third-party site features.

Most browsers allow you to view, manage, delete, and block cookies for a certain website. Keep in mind that if you delete all cookies, any preferences you have set will be lost, including the ability to opt out of cookies, since the feature itself requires a cookie for opting out from your device.

### **Objection to the use of cookies**

If you do not want IDEA LAB LTD. to collect and analyze information about your visit, you can object at any time in the future (opt-out). If you would like to object, please contact us at the contact details listed above.

For the technical input of this discrepancy, your browser will be supplied with an opt-out cookie. This cookie is intended for the sole purpose of marking your objection. Please note that, for technical reasons, the opt-out cookie can only be used for the browser from which it was set up. If you delete the cookies or use a different browser or device, you will have to opt-out again.

## **THIRD-PARTY COOKIES WHICH WE USE**

### **Google AdWords**

As an AdWords client, we use Google Conversion Tracking. This is an analysis service provided by Google Inc. (1600 Amphitheater Parkway, Mountain View, CA 94043, USA; "Google"). If you open the website through a Google ad, Google Adwords will set a cookie on your device ("conversion cookie" – a performance cookie). This cookie will expire in 30 days. It is not for personal identification. If the cookie has not expired, when you visit certain pages, we and Google can understand that someone has clicked on the ad and has been redirected to our site. Each advertiser receives a different cookie. That is why cookies cannot be tracked through the advertisers' websites. The information gathered through the conversion cookie is used to generate conversion statistics for AdWords clients, who opted for conversion tracking. Advertisers will see the total number of users who clicked on the ad and were redirected to a page with conversion tracking tags. However, they do not receive any information that could personally identify the users. If you do not want to participate in the tracking process, you can also opt out of setting up the cookie - for example, by the setting of the browser that typically disables automatic cookies. You can also disable

Conversion Tracking cookies by setting your browser to block cookies from the googleadservices.com domain.

### **Google Analytics**

We're working with Google Analytics. This is a Google Inc. web analytics service. (1600 Amphitheater Parkway, Mountain View, CA 94043, USA, "Google"). The information generated by the Google Analytics cookie for the use of our website is usually transmitted and stored by Google on a US server. IP anonymity is activated on our websites so that the IP address of Google users in the Member States of the European Union or other contracting parties to the Agreement on the European Economic Area is abbreviated in advance. Only in exceptional cases will the full IP address be sent to a Google server in the US and will be stored there. Google will use this information on our behalf to assess the use of the website for compiling activity reports on the website and to provide us with other services related to the use of the website and the use of the Internet. The IP address provided to Google Analytics as part of Google Analytics will not be merged with other Google data. You can prevent cookies from being stored by the appropriate browser settings; however, we would like to inform you that in this case you may not be able to make full use of all the features of this site.

You may also prevent the collection and processing of the data generated by the cookie and related to the use of the website by Google (including your IP address) by installing the browser plug-in from the following address:

<http://tools.google.com/dlpage/gaoptout?hl=en>

### **Bing Ads**

We use Conversion Tracking from Microsoft Corporation (One Microsoft Way, Redmond, WA 98052-6399, USA, Microsoft). When you reach the website via a Bing ad, Microsoft Bing Ads puts a cookie on your device. This will allow Microsoft Bing and us to know that someone has clicked on an ad and has been redirected to our website. We only see the total number of users who clicked on a Bing ad and were redirected. No personally identifiable information is provided. If you do not want to participate in the tracking process, you can opt out of a cookie using the relevant setting - for example, by the browser setting that typically disables the automatic cookie setting.

### **Facebook redirecting**

We use the Custom Audience Tracking Tool on Facebook Inc. websites (1601 S. California Ave., Palo Alto, CA 94304, USA; "Facebook"). If you have a Facebook user account and this is recognizable for the tool based on the existing Facebook cookies, this tool will generate a non-personal control amount to be transmitted to Facebook for analytical and marketing purposes. On the other hand, we encrypt your email address and send it in an encrypted form to Facebook. By recognizing the cookies and transmitting encrypted information, Facebook can offer you targeted recommendations for products such as customized banner ads on Facebook.

You can object to the use of a personalized Facebook audience at [https://www.facebook.com/ads/website\\_custom\\_audiences/](https://www.facebook.com/ads/website_custom_audiences/).

### **Right to amendments**

We reserve the right to modify this privacy statement in accordance with the legal regulations. Of course, we will inform you of any major changes, such as changes to the purpose or the introduction of new processing purposes.

23.05.2018