

# MIFROMA PRIVACY POLICY FOR CONTESTS AND SWEEPSTAKES

## General

At Mifroma SA, (referred to as “Mifroma,” “us,” “our,” or “we”), we recognize that your privacy is important and are therefore committed to protecting it. We use the information we collect about you only to contact you about prize matters. As a result, we have implemented the following version of our Privacy Policy (“Policy”).

This Policy discloses the privacy practices for Mifroma’s Taste Contest website (“Website”), which includes the Daily Instant Win Sweepstakes, Instagram Photo Contest and Giveaway influencer contests (collectively the “Contest Services”). You can participate in Mifroma’s Contest Services as long as you meet eligibility requirements and comply with all applicable rules. As part of your participation, you will be required to provide us with your name, mailing address, e-mail address and other information in order to administer the promotion, and notify winners. Participation and acceptance of a prize constitutes each winner’s permission for Mifroma’s to use his/her name, likeness, photograph, picture, portrait, voice, biographical information, and/or any statements made by each winner regarding the Contest Services or Mifroma for advertising and promotional purposes without notice or additional compensation, except where prohibited by law.

We reserve the right to change this Privacy Policy from time to time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your account, by placing a prominent notice on our site, and by updating any privacy information on this page. Your continued use of the Website and/or Services available through this Website after such modifications will constitute your acknowledgment of the modified Policy.

(Please note, if you are registering for or participating in a Mifroma sweepstakes or contest, participation is subject to ours and any other rules and regulations applicable to such competition (collectively, the “Rules”). If this Policy conflicts with or is inconsistent with a statement in the Rules concerning your privacy, the terms of the Rules will take precedence. The current rules can be found here:

- <https://www.mifroma.com/var/DAILY-INSTANT-WIN-SWEEPSTAKES-OFFICIAL-RULES.pdf>
- <https://www.mifroma.com/var/Photo-contest-Official-Rules.pdf>

**IMPORTANT:** By using the Website and/or offerings available on this Website, you give your consent that all Personal Data that you submit may be processed by us in

the manner and for the purposes described below. If you do not agree to these terms and conditions, do not use the Website.

## **1. What Types of Information Do We Collect?**

In order to better provide you with Services offered on the Website, we collect two types of information about our users: Personally Identifiable Information (“Personal Data”) and Aggregate Information.

### **Personal Data:**

This refers to information that lets us know the specifics of who you are. When you engage in certain activities on this Website, such as registering for an account, downloading or purchasing a product or service, submitting content and/or posting content in the user forums, or sending us feedback, we may ask you to provide certain information about yourself.

Examples of Personal Data may include your first and last name, date of birth, email address, mailing address (including zip code), telephone numbers and other information that can identify you directly or indirectly.

### **Aggregate Information:**

This refers to information that does not by itself identify a specific individual. We gather certain information about you based upon where you visit our Website and what other sites may have directed you to us. This information, which is collected in a variety of different ways, is compiled and analyzed on both a personal and an aggregated basis. This information may include the Website’s Uniform Resource Locator (“URL”) that points to the site you just came from, which URL you go to after visiting our Website, what browser you are using, and your Internet Protocol (“IP”) address.

## **2. How Do We Collect and Use Information?**

We do not collect any Personal Data about you through the Website unless you voluntarily provide it to us. However, you may be required to provide certain Personal Data to us when you elect to use certain products or services available on the Website. These may include: (a) activating an account on our Website; (b) entering a sweepstakes or contest sponsored by us or one of our partners; (c) signing up for special offers from selected third parties; (d) sending us an email message; (e) submitting a web form or transmitting other information by telephone or letter; (f) registering or attending an event affiliated with Mifroma or at which Mifroma participates; (g) submitting your credit card or other payment information when ordering and purchasing products and services on our Website; or adding performance results through the Website.

We will only use your Personal Data in ways that are compatible with the purposes for which it was collected or as subsequently authorized by you. We will use your Personal Data to provide product or service offerings to you. We will also use certain forms of Personal Data to enhance the operation of our Website, improve our internal marketing and promotional efforts, statistically analyze Website use, improve our product and service offerings, and customize our Website's content, layout, and services. We may use Personal Data to deliver information to you and to contact you regarding administrative notices. Finally, we may use your Personal Data to resolve disputes, troubleshooting problems and enforce our agreements with you, including our Website Terms of Use, and this Privacy Policy.

### **Service Providers, Agents and Related Third Parties:**

We sometimes hire third parties to perform certain business-related functions. When we employ a third party to perform a function of this nature, we may need to provide them with access to certain Personal Data. For example, in order to provide services to you, we may provide a limited amount of information about you to EasyPromos, S.L., Inc. ("EasyPromos") so that EasyPromos can collect publicly available contact and social media information related to you such as email addresses, gender, company, job titles, photos, website URLs, social network handles and physical addresses. For more information on the privacy practices of EasyPromos, please see <https://www.easypromosapp.com/privacy-policy/>. However, we only provide them with the information that they need to perform their specific function, and these third party service providers will only use your Personal Data to perform the services requested by us.

Mifroma requires its agents and service providers that have access to Personal Data received by Mifroma to provide at least the same level of privacy protection as is required by this Privacy Policy. Where Mifroma has knowledge that an agent or service provider is using or disclosing Personal Data in a manner contrary to this Privacy Policy, Mifroma will take reasonable steps to prevent or stop the use or disclosure of such Personal Data.

### **Information Collected with Technology:**

Information Collected by Our Servers. To make our Website and Services more useful to you, our servers (which may be hosted by a third party service provider) collect information from you, including your browser type, operating system, Internet Protocol ("IP") address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit.

Log Files. As is true of most websites, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider ("ISP"), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to analyze trends, administer the Website, track users' movements around the Website, gather demographic information about our user base as a whole, and better tailor our Services to our users' needs. For example, some of the information may be collected so that when you visit the Website or the Services again, it will recognize you and the information could then be used to serve advertisements and other information appropriate to your interests. Except as noted in this Privacy Policy, we do not link this automatically-collected data to Personal Data.

Cookies. Like many online services, we use cookies to collect information. "**Cookies**" are small pieces of information that a website sends to your computer's hard drive while you are viewing the website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Website. This type of information is collected to make the Website more useful to you and to tailor the experience with us to meet your special interests and needs. Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some aspects of the Website may not function properly if you elect to disable cookies.

Pixel Tags. In addition, we use "Pixel Tags" (also referred to as clear Gifs, Web beacons, or Web bugs). Pixel Tags are tiny graphic images with a unique identifier, similar in function to Cookies, that are used to track online movements of Web users. In contrast to Cookies, which are stored on a user's computer hard drive, Pixel Tags are embedded invisibly in Web pages. Pixel Tags also allow us to send e-mail messages in a format users can read, and they tell us whether e-mails have been opened to ensure that we are sending only messages that are of interest to our users. We may use this information to reduce or eliminate messages sent to a user.

Mobile Services. We may also collect non-personal information from your mobile device if you have downloaded our mobile application(s). This information is generally used to help us deliver the most relevant information to you. Examples of information that may be collected and used include your geographic location, how you use the mobile application(s), and information about the type of device you use. In addition, in the event our mobile application(s) crash on your mobile device, we will receive information about your mobile device model software version and device carrier, which allows us to identify and fix bugs and otherwise improve the performance of our mobile application(s). This information is sent to us as aggregated information and is not traceable to any individual and cannot be used to identify an individual.

Analytics Tools. We use third party analytics tools to help measure traffic and usage trends for the Website, mobile applications and our Services. Analytics tools collect information sent by your mobile device, our Website or our Services, including the web pages you visit, add-ons and other information that assists us in improving the Website, mobile applications and the Services.

Location Information. If you have enabled location services on your phone, we collect your location information to make a map available to the recipients of your messages showing your location. If you do not want this information collected by us, you can disable location services on your phone.

### **3. How Do We Handle Data From International Visitors and Users?**

Mifroma is based in the Switzerland and provides services globally. We primarily store personal information about website visitors and users within the European Economic Area (the “EEA”), the United States and in other countries and territories. To facilitate our global operations, we may transfer and access such personal information from around the world, including from other countries in which the Mifroma has operations for the purposes described in this Policy. We may also transfer your personal information to our third party subprocessors as detailed here, who may be located in a different country to you.

If you are visiting our Websites from the EEA or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your personal information to the United States and other jurisdictions in which we operate. By providing your Personal Data, you consent to any transfer and processing in accordance with this Policy.

### **4. How Do We Share Information With Others?**

We will not sell, trade, or rent your Personal Data to others. If and whenever we intend to share your Personal Data with a third party (other than to a business partner as provided herein), you will be notified at the time of data collection or transfer, and you will have the option of not permitting the transfer. However, we may from time to time rent or sell demographic information in the aggregate that does not contain your Personal Data.

We do provide some of our product and service offerings through contractual arrangements made with affiliates, service providers, partners and other third parties (“Third party service providers”). We and our Third party service providers may need to use some Personal Data in order to perform tasks between our respective sites, or to deliver products or services to you.

We may share some or all of your Personal Data in connection with or during negotiation of any merger, financing, acquisition or dissolution, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.

Mifroma allows you to create an account and log in to use the Service through the following Third-Party Services:

- Google
- Facebook

If you decide to register through or otherwise grant us access to a Third-Party Service, we may collect Personal Data that is already associated with Your Third-Party account, such as your name, your email address, your activities or your contact list associated with that account.

You may also have the option of sharing additional information with us through your Third-Party Service's account. If you choose to provide such information and Personal Data, during registration or otherwise, you are giving us permission to use, share, and store it in a manner consistent with this Privacy Policy. This may include features that are designed to permit interactions that you initiate between our site and Third-Party Service's websites or services, including third-party social networks (collectively, "Social Media Interactions"). For example, you may be able to "like" or "share" content from our Contest Services on other websites or services, such as [Facebook/Instagram](#), [Twitter](#), [YouTube/Google](#), and [LinkedIn](#). By choosing to like or share information from our Services through these services, you should review the privacy policy of that service.

If you use Social Media Interactions on our Services or access our Contest Services from Social Media Interactions, both Mifroma and the social media services that operate those Social Media Interactions may have access to certain information about you and your use of both our site and theirs. If you are a member of a social media site and logged in, the interfaces configured on our Contest Services may allow the social media site to connect your site visit and browsing behavior to the personal data held on your social media site. We may use this information on an aggregate basis to place ads that are based on your interests on these social media sites. These

practices are governed by the privacy statements of these social networking sites and you are advised to review these separately.

In addition, we may request your permission to a) access and collect information available from your social networking account; and b) post information to your friends on your behalf.

The information collected and stored by the social media sites remains subject to those sites' privacy practices, including whether they continue to share information with us, the types of information shared, and your choices with regard to what is visible to others on those third-party websites or services.

If you choose to post content to social networking sites (e.g., Facebook or Twitter) ("SNSs"), we will provide information to such SNSs in accordance with your elections. You acknowledge and agree that you are solely responsible for your use of those web sites and that it is your responsibility to review the terms of use and privacy policy of the third party provider of such SNSs. We will not be responsible or liable for: (i) the availability or accuracy of such SNSs; (ii) the content, products or services on or availability of such SNSs; or (iii) your use of any such SNSs.

In some certain circumstances, we may be required by public, law enforcement or judicial authorities to provide Personal Data to the appropriate governmental authorities. In such cases, we will disclose Personal Data upon receipt of a court order, subpoena, or to cooperate with a law enforcement investigation or meet national security requirements. We may also disclose Personal Data information if we believe it is necessary in order to protect or defend the rights or property of Mifroma or users of the Website or Services.

We may also provide Aggregate Information about our customers' sales, traffic patterns, and related Website information to third party advertisers, but these statistics do not include any Personal Data.

## **5. What Are My Privacy Options?**

We may send you e-mails regarding new products and services that we feel may interest you. If you do not wish to receive emails of this nature, you may unsubscribe from the mail list using the "unsubscribe" feature that accompanies our emails or by contacting us at [recht@mgb.ch](mailto:recht@mgb.ch).

You also have choices with respect to cookies, as described above. By modifying your browser preferences, you have the choice to accept all cookies, to be notified when a

cookie is set, or to reject all cookies. If you choose to reject all cookies some parts of our Website may not work properly in your case.

If you decide at any time that you no longer wish to have one or more of your SNS accounts (e.g., Facebook or Twitter) linked to your account, then you may de-link the SNS account in the "preferences" section in your account settings. You may also manage the sharing of certain Personal Data with us when you connect with us through an SNS, such as through Facebook Connect. Please refer to the privacy settings of the applicable SNS to determine how you may adjust our permissions and manage the interactivity between the Services and your social media account or mobile device.

In addition, if we propose to use your Personal Data for any purposes other than those described in this Policy and/or in the specific notice provided when you sign up for a certain component of our services, we will offer you an effective way to opt out of our use of your Personal Data for those other purposes.

You may review, update, amend, or correct the Personal Data in your user account by contacting us or by editing your profile via the service. Upon request, to the extent required by applicable law, Mifroma will grant you reasonable access to Personal Data that it holds about you and will take reasonable steps to permit you to correct or amend Personal Data. You can make these requests by contacting us at [recht@mgb.ch](mailto:recht@mgb.ch).

## **6. How Do We Secure Your Data and Information?**

Mifroma is committed to protecting the security of your Personal Data. We use a variety of industry-standard security technologies and procedures to help protect your Personal Data from unauthorized access, use, or disclosure. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while Mifroma uses reasonable efforts to protect your Personal Data, Mifroma cannot guarantee its absolute security.

## **7. How to Update and Correct Information**

We believe you should have the ability to access and edit the Personal Data that you have provided to us. You may change any of your Personal Data in your account online at any time by linking to your account in accordance with instructions posted elsewhere on this Website. You may also access and correct your personal information and privacy preferences by emailing us at [recht@mgb.ch](mailto:recht@mgb.ch).

Please include your name, address, and/or email address when you contact us.



We encourage you to promptly update your Personal Data if it changes. You may ask to have the information on your account deleted or removed. Upon request, to the extent required by applicable law, Mifroma will grant you reasonable access to Personal Data that it holds about you and will take reasonable steps to permit you to correct, amend or delete Personal Data. You can make these requests by contacting us at [recht@mgb.ch](mailto:recht@mgb.ch).

## **8. What Exclusions are there to the Privacy Policy?**

This Privacy Policy shall not apply to any unsolicited information you provide to us. This includes, but is not limited to, any ideas for new products or modifications to existing services, and other unsolicited submissions (collectively, “Unsolicited Information”), including all User Content, as that term is defined in Mifroma’s Terms of Use, that by its nature is accessible or intended to be accessible to other users of the services.

All such Unsolicited Information shall be deemed to be non-confidential and we shall be free to reproduce, use, disclose, and distribute such Unsolicited Information to others without limitation or attribution.

You should also be aware that when Personally Identifiable Information is voluntarily disclosed (i.e. your name, email address, etc.) in the discussion forums or other public areas on this Website, that information, along with any information disclosed in your communication, can be collected and used by third parties and may result in unsolicited messages (including unwanted spam messages) from third parties. Such activities are beyond our control and this Policy does not apply to such information. Please consult our Website Terms and Conditions of Use Agreement for our Website Conduct policies:

[https://www.mifromatastecontest.com/promo\\_terms/897188](https://www.mifromatastecontest.com/promo_terms/897188)

If you have any questions, concerns, or inquiries about our Privacy Policy, our use of your Personal Data, or our privacy practices, please contact us at [recht@mgb.ch](mailto:recht@mgb.ch).

You may also send written correspondence to:

Migros-Genossenschaft-Bund  
Direction Legal & Compliance  
Limmatstrasse 152  
8031 Zürich  
Switzerland

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