Welcome to https://trendhero.io/ (the "Website", “Our site”, “Service”), a service offered by Trendhero Ltd. and/or its subsidiaries (“TrendHero”, “Trendhero”, “Trendhero.io”, "we", "us" or "our").

For the purposes of General Data Protection Regulation (EU) 2016/679 of 27 April 2016 ("GDPR"), Trendhero Ltd., having registered address at 3A Hudson Drive, Bodden Town, CAYMAN ISLANDS, is the "controller" or a "data controller", i.e. the person which determines the purposes and means of the processing of your personal data.

Information related to cookies and other similar technologies you can find in our Cookies Policy, which together with this Privacy Policy forms the part of our Terms of Use. So, we encourage you to take some time to read this Privacy Policy and our Cookie Policy, along with our Terms of Use, in order to be sure that you understand our personal information related policies and are comfortable with providing us with your personal data.

If, while reading this Privacy Policy, you find some undefined terms, it has the same meaning as in our Terms of Use.

If you for some reason(s) do not agree with any provision of this Privacy Policy, then you should not access or use the Website and our Services.

If you have any questions and/or concerns about this Privacy Policy, you can contact us at any time through the support@trendhero.net.

2. What personal data and data is processed and the legal basis for processing

2.1. CUSTOMERS

There are different types of information we obtain, whether directly from you at sign up or automatically via your device (for instance, personal computer, laptop, mobile phone) when you use our Sites. Essentially, we only obtain what is strictly necessary to provide you with our Services, no more, no less.

In terms of the service Trendhero.io usage, personal data of our clients is their account data obligatory (e-mail address as a login in the service) and additional (name, phone number, Skype name) for customer support needs and online-identifiers of the web session (browser, geolocation, type and operational system of device, IP-address, cookies).

The rest is the technical stuff that must be processed in order to provide you with our services. We collect Internet Protocol (IP) address for performing of the contract. You need this to connect to the Internet. We set and access various cookies* on your device, and we processing it for contract performance for the “strictly necessary” cookies. Legitimate interest for the first-party analytics cookies. Your consent prior to the placement of all the other types of cookies.

2.2. INFLUENCERS
In essence, We only process information which you already shared with the world. We ensure We have a legal basis for processing your personal data. We treat it in accordance with relevant legislation and respect Your Rights (see section below).

<table>
<thead>
<tr>
<th>Information about Influencer:</th>
<th>Legal basis for processing</th>
<th>Reason for collection</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. A link to Influencer profile, full name, avatar, language, biography, country/city/state, brand and common interests, notable engaged users, sponsored posts.</td>
<td>Influencers provide their data to social networks, thereby making it public. TrendHero handles anonymous data that it receives from public sources. Using artificial intelligence, TrendHero calculates the general metrics of the audience of the influencer, the cost of advertising (including based on open market statistics), as well as other marketing indicators</td>
<td>To allow Customers to choose an Influencer for their business purposes and assess the effectiveness of each Influencer’s reach.</td>
</tr>
<tr>
<td>2. Email and social network profile.</td>
<td></td>
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<tr>
<td>3. Images, graphics, photos, profiles, audio and video clips, sounds, musical works, works of authorship, applications, links and other content or materials from your social network profile.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2.3. Audience data and statistics

We analyse a vast amount of information in order to provide Customers with statistics. In relation to Influencer audience (the “Audience”), this includes, in particular: gender, age group and ethnicity. While these items may represent a somewhat sensitive issue, We have undertaken a review of our legitimate interests and the risks to the rights and freedoms of individuals. We concluded that our processing for statistical purposes is in line with legislation and does not affect the rights and freedoms of individuals.

In order to legally process data on the ethnic origin of the Audience, We require relevant legal basis. One of the bases is processing for statistical purposes (while safeguarding fundamental rights and interests of the Audience). Such processing does not have discriminatory effects on natural persons involved nor results in measures having such effect. Finally, there is no automated decision-making and profiling based on ethnic origin of the Audience.

3. What we do with personal data and data
3.1. CUSTOMERS

We do not sell, share or disclose Customer data except as provided herein. We never treat your personal data in any way that would surprise you (unless We told you about it and you provided us with an informed and unambiguous consent to such usage).

We use Customer contact details and payment information to establish, support and conduct customer relationships as necessary for the performance of Services. Should the Customer fail to provide the personal data we need, we may be unable to complete the transaction. We only contact Customers with service related information. Where marketing is involved, Customers have an option to opt out at any time before first (and any subsequent) contact.

3.2. INFLUENCERS

We provide a statistical service and so, the data about Influencers identified above is shared with Customers whether on a trial basis or upon payment of fees.

3.3. AUDIENCE DATA

Audience data for each Influencer is aggregated for statistical purposes and shared with Customers whether on a trial basis or upon payment of fees.

4. How long personal data is stored for

4.1. CUSTOMERS

We store your data while your account is active. Whether your annual subscription expires or you fail to use the credits on time, we will delete your personal data from our systems 1 month from expiration of your annual subscription or when you exercise your rights (as listed below).

4.2. INFLUENCERS

As stated above, We process information obtained from public sources. The updates may take up to 20 days. If an Influencer deletes their account, We would also delete such information from our systems and make it unavailable to Customers. This synchronisation may take up to a month from when the deletion happens on social network.

4.3. AUDIENCE DATA

Audience data is only relevant to the Influencer and is kept in an aggregated form together with information about Influencer. Once Influencer data is deleted, Audience data of the Influencer is also removed.

5. Security measures used by Us

TrendHero is committed to ensuring that your data is secure. We use appropriate administrative and technical measures to protect data about Our Users. The measures We use, are designed to provide a level of security appropriate to the risk of processing Our Users' and their users' personal data.

6. Why we collect and process your personal data
We are extremely serious about your privacy and use your personal data only for legitimate reasons and in accordance with personal data protection law, for purposes such as:

- to provide you with the Services you request;
- to ensure that our Website content is presented on your device in the most effective way;
- to contact you in relation to our Services process;
- to carry out our obligations arising from any contracts entered into between you and TrendHero;
- to manage your Profile, including processing payments and refunds and providing notifications;
- to keep our Website safe and secure;
- to notify you about changes in our Services;
- to respond to, and handle any comments, queries or complaints addressed by you regarding the Website and our Services, and any similar comments, queries or complaints from other customers;
- to conduct research, statistical and behavioral analysis;
- to contact you for marketing purposes, where applicable;
- to administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to make suggestions and recommendations to you and other customers of Website about services that may interest you or them.
- maintain, and improve our services.

7. Third-party services

We may use third party services such as:

- Hosting providers Microsoft Azure and AWS. The servers are located mainly in the territory of European Union.
- Messaging service providers (e.g. Viber, Telegram).
- Proprietary push notifications infrastructures (e.g. APNS, FCM, Mozilla autopush).
- Payment processors.

We do not sell, trade or otherwise transfer Our Users' data or their users' data to any third parties for commercial purposes.

8. Cookies and similar technologies

We use aggregated, non-identifying, electronic data collected from use of our Sites and Services to operate, analyze, improve, and develop our Sites and Services. This information is not used to inform decisions about specific individuals; rather, it is processed to understand how different categories of users interact with our Sites and Services so that we can consistently improve the same for Customers.

We work with analytics providers such as Google Analytics, which use cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. Google Analytics may also collect information regarding the use of other websites, apps and online resources.

9. Children's personal data
TrendHero.io is not intended for use by children. We do not knowingly collect any personal data from children under the age of 16. If You are under the age of 16, please do not submit any personal data through Our Site or Service.

11. Changes to the privacy policy

We may change this Privacy Policy as it may be necessary, or as it may be required by law. Any changes will be posted on the Website and You will be deemed to have accepted the terms of the Privacy Policy on Your first use of the Website following the alterations. We recommend that You read this page regularly to keep informed.

Last updated: Nov 20, 2019