

Horizon Social Community for Facebook

End-User Privacy Policy

This document provides an overview of the data collected from Facebook through loyalty programs that use Horizon Social Community.

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Introduction

This privacy policy will help you understand how we use and store your data if you are an end-user of one of our Facebook apps. This means that you are a member of a loyalty program run by one of our clients, and you have agreed to connect your loyalty account to your Facebook account.

Definitions

When we talk about "we", "us", or "HTK" in this document, we're referring to the company HTK Limited, which operates at Chapmans Warehouse, Wherry Quay, Ipswich, UK, IP4 1AS, and can be found online at <u>www.htk.co.uk</u>.

"The Brand" is the company to whom you've directly provided your details when signing up to their loyalty program.

When we reference **"Horizon"** or **"our software"**, we're talking about the Horizon Loyalty Hub – the software we build and maintain, which the Brand uses to run their marketing and loyalty program. This is the software that will collect and store your data when you connect your Facebook account.

"The Loyalty Portal" refers to the website where you log-in to your loyalty account, view your points balance, redeem rewards and otherwise interact with the Brand's loyalty program.

1. Information we collect and store

1.1 Basic profile data

When you sign up to the Brand's Loyalty Portal, you'll have the option to log in with your Facebook account. If you choose to do so, Horizon will automatically collect the following information from your Facebook profile:

- First and last name
- Email address
- Profile picture

If you already have a Loyalty Portal account and choose to link your Facebook profile later on, you'll be granting us the same level of access outlined above.

1.2 Extended profile data

Once you have connected your Facebook account, you will have the option to share additional profile information with the Brand, so they can give you a more personalized experience and better rewards. If you choose to share your profile information, we will collect:

- Pages you've liked, including:
 - Books
 - \circ Movies
 - Music
 - Television
 - Games
- Your birthday
- Your gender
- Your relationship status

This will allow Horizon to present more targeted offers and rewards for you to redeem within the Brand's Loyalty Portal.

1.3 Interaction with your posts

When you post to Facebook via the Brand's Loyalty Portal, Horizon will track interactions with your post in order to award you additional loyalty points. We'll collect information on:

- How many likes your post receives within the first 24 hours
- When a friend clicks on your link and joins the loyalty program
- When a friend clicks on your link and makes a purchase

We'll only collect this information for posts you've made via the Loyalty Portal, using our software.

2. How we use your data

It's up to the Brand to decide how they use your data for marketing purposes – you should check their privacy policy, which should be accessible from their website, to find out more.

Our software will use your data only for the purposes outlined below.

2.1 Rewarding your social activity

Connecting your account will allow Horizon to post to your Facebook timeline, but only when you click to share a reward or offer from the Loyalty Portal to earn loyalty points. You'll be able to review and edit the post before sharing.

Once you've shared a link from the Loyalty Portal, Horizon will track the number of Facebook "likes" your post receives – we'll use this information to award you additional loyalty points.

2.2 Personalizing offers and rewards

Our software will use the information you share to determine which rewards and offers will be most relevant to you, based on criteria that the Brand has set. The rewards Horizon selects will be highlighted in your personalized rewards section when you log-in to the Loyalty Portal. This will help you find rewards that match your interests more easily.

We'll use your birthday to enable the Brand to present you with a personalized offer on the day, if they choose.

2.3 Marketing insights

Connecting your Facebook account to your Loyalty Portal account does not mean you will be opted in to receive marketing communications from the Brand. However, if you have signed up to receive marketing from the Brand previously, the Facebook data you share may be used to target these marketing messages.

Whether or not you have opted in to receive marketing, Horizon will use your data to help the Brand understand the interests and demographics of their loyalty program members. This means that your data will be aggregated with that of other program members to show the Brand the top pages (e.g. TV programs, bands, films, etc.) liked by their customer base.

3. Keeping your data secure

HTK is committed to keeping your information safe, and we take reasonable steps to do so.

3.1 Who can see your data

The social profile information you share will be stored in our secure database and may be aggregated with other data you've shared with the Brand. This data may be visible to employees of the Brand who use our software for marketing or customer service purposes.

It may also be visible to employees of HTK who access the Brand's account to run marketing or loyalty campaigns on their behalf, or to provide software support.

3.2 Who owns your data

You own any data you share, unless otherwise specified in the privacy policy of Facebook or the Brand. The ways in which your data can be used by the Brand are subject to the conditions set out in their privacy policy – this means they could choose to share it with third parties and use it for marketing purposes beyond those defined in this document. You should check their website to find out more. We are not responsible for any misuse of your data by the Brand.

HTK does not own your data, will not remove any personally identifiable information from the Brand's database, and will not sell or pass on your information to third parties, except where required by law.

4. Your choices

We will not collect any data or post to your page without your consent. You have the option to disconnect your account at any time. This can be done by signing in to your account on the Brand's Loyalty Portal and visiting the "Account" or "Settings" page. Disconnecting your account will remove the loyalty points you originally earned for linking it.

The Brand will not be able to see the individual pages you like associated with your contact record in our software – this data is only used to show the Brand aggregate information about the common interests of their loyalty members, or to group all of their loyalty members by similar interests for the purpose of sending targeted communications or rewards.

If you choose to close your loyalty account entirely, we will retain the data you have shared for 90 days. Horizon will no longer have access to your profile either to collect data or create posts.