

Molyfit Ltd. Facebook Page privacy policy

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Introduction

All organisations that use people's personal information must explain how they use and protect that information.

In this document, we (Molyfit Ltd) explain to you how we use and protect personal information about you in relation to Molyfit Ltd's Facebook Page.

We have a separate website at www.molyfit.co.uk. There, we have a privacy policy that explains what we do with the information we collect and use with respect to that website and when providing our services.

This document explains only what we do on our Facebook Page.

We need to provide this document because we jointly control with Facebook the information about you and our other users that is collected through our Facebook Page. This means that we need to explain certain things to you that only relate to our Facebook Page.

This document is not about getting your consent for something. Instead, it is designed to tell you what we do, why we do it, and what rights you have. We are not asking you to agree to anything.

Details about those controlling personal information about you

The organisations jointly responsible for the operation of this Facebook Page under the European General Data Protection Regulation are:

Facebook Ireland Ltd.
4 Grand Canal Square
Grand Canal Harbour
Dublin 2
Ireland

and

Molyfit Ltd.
6 Jenkins Avenue
Bricket Wood
St Albans
United Kingdom
AL2 3SB

Contact Molyfit Ltd. via the email address hello@molyfit.co.uk.

Contact Facebook Ireland at www.facebook.com/help/contact/540977946302970.

Joint responsibility

The agreement about joint responsibility between Molyfit Ltd. and Facebook Ireland Ltd. can be found at www.facebook.com/legal/terms/page_controller_addendum. Joint responsibility in this sense means that Molyfit Ltd. and Facebook Ireland Ltd. are both responsible for the things done to personal information about you when you use Molyfit Ltd.'s Facebook Page.

Under the joint responsibility agreement, responsibilities are not divided equally between Molyfit Ltd. and Facebook Ireland Ltd. Most relevantly, Facebook Ireland Ltd has specifically taken responsibility for informing you about what is done with information about you, enabling you to exercise your rights, securely handling personal information about you, and letting you know if there is a data breach. More information about how responsibilities are divided between us and Facebook can be found in the 'Controller addendum', which can be found in the hyperlink in the paragraph above.

What our Facebook Page is for

We operate this Page as a way of drawing attention to our main business website and the services and products we provide. This Facebook Page is also a way of providing opportunities for customers to contact us. Our website can be found at molyfit.co.uk.

We do not extract the information collected by Facebook Ireland Ltd. for the purposes of direct marketing.

What Facebook does with personal information about you

Detailed and up-to-date information about how Facebook uses personal information about you can be found here: www.facebook.com/about/privacy. Below is a short summary.

Facebook uses personal information about users for the following purposes:

- advertising (e.g., analysis and personalisation);
- analytics and other internal business services;
- creation of user profiles;
- market research;
- other research;
- product development;
- security; and

- service personalisation (including location-related information and, where enabled, facial recognition).

Facebook 'Insights'

Facebook provides to Page owners statistical information called 'Insights'. This information is related to the use of the owner's Pages. 'Insights' can be accessed by the owners of the relevant Pages. The information is collected, analysed, and presented by Facebook. We have no influence on how Facebook uses the information. We are not able to disable the 'Insights' function.

When we request it, Facebook is able to show us (as owners of this Page) the following types of information:

- answers;
- clicks on route planners;
- clicks on telephone numbers;
- comments;
- language;
- 'likes';
- origin by country and city;
- page activity;
- post interactions;
- post reach;
- proportion of men and women;
- reach;
- shared content;
- total number of page views;
- video views; and
- visits to and clicks in the shop.

In the same way, Facebook provides information about any Facebook Groups connected to our Facebook Page. For more information about the personal information collected for 'Insights', see here: www.facebook.com/legal/terms/information_about_page_insights_data.

Facebook's use of cookies

Facebook Ireland Ltd. uses small computer files called 'cookies' to help collect, store, and use the information described above. These files are stored on the devices you use to access Facebook. If you have a Facebook profile and you are logged into Facebook, information is stored and analysed across devices. More information about how Facebook uses cookies can be found here: www.facebook.com/policies/cookies.

Information about cookies generally can be found at www.aboutcookies.org and www.allaboutcookies.org.

You can manage Facebook's personalised advertising at www.facebook.com/about/ads.

What Molyfit does with personal information about you

We use the aggregated 'Insights' information to make decisions about our Facebook Page (such as what content to add and when to do so).

We are allowed to do this because it is within our legitimate interests under Article 6(1)(f) GDPR. We believe we have a legitimate interest to do this because:

- we have a legitimate commercial interest in using the personal information to understand who uses our Page and how;
- there is no less invasive way for us to achieve the same commercial interest;

- both users and Molyfit Ltd. benefit from the way the information is used in that we are able to provide users a Page that is helpful and enjoyable to use;
- the personal information we use is minimally invasive;
- the use of the personal information will have a very small impact on users and will cause them no harm;
- users would expect us to use the information in the way that we do;
- the personal information we use is aggregated;
- we therefore think that it is reasonable and proportionate for us to use the personal information in the way that we do.

How Molyfit Ltd. uses personal information about you outside of Facebook

For information about how we use personal information about you when we provide products or services to you, or when you use our website (molyfit.co.uk), please see our main privacy policy at molyfit.co.uk/privacy.

Retaining personal information about you

Facebook Ireland Ltd. stores personal information about you until it is no longer necessary to provide their services and products or until your account is deleted – whichever comes first. More information can be found in the Facebook Data Policy in the section on 'Data retention, account deactivation and deletion'. The policy can be found here: en-gb.facebook.com/policy.php.

International transfer of personal information about you

Facebook Inc. is the USA-based parent company of Facebook Ireland Ltd. Facebook Inc. is certified under the EU-U.S. Privacy Shield. This means that it promises to comply with European data protection requirements. Because of this, personal information about you can be transferred to Facebook Inc. in the USA. More information about Facebook's Privacy Shield status can be found here: www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active.

Your rights

You have a number of rights about personal information we hold about you. Facebook Ireland Ltd. has taken primary responsibility for ensuring that you are able to exercise your rights as they relate to the use of personal information about you as a consequence of you using this Page. If you have any questions about your rights, please contact Facebook directly. You can use this web form to do so: www.facebook.com/help/contact/540977946302970.

If rights-related questions are sent directly to us, the agreement we have with Facebook obliges us to forward these questions to Facebook promptly or within seven calendar days.

If you no longer wish to have information about you used as described in this document, please cancel the connection of your user profile to our page by using the function "Unlike this Page".

More information about your rights can be found on the webpage of the Information Commissioner's Office (www.ico.org.uk). Under some circumstances, by law you have the right to:

- **Be informed** in a clear, transparent and easily understandable way about how personal information about you is used and about your rights.
- **Request access** to personal information about you (this is known as a 'data subject access request'). This right lets you receive a copy of the personal information held about you and to check that it is being used lawfully.
- **Request correction** of personal information that relates to you.
- **Request erasure** of personal information about you. This means you can ask for the relevant personal information to be deleted where there is no good reason for it to be used. An example of a

good reason to keep it is to comply with legal obligations. You can also ask for personal information relating to you to be deleted where you have exercised your right to object to the use of that personal information (see below).

- **Object** to the use of personal information about you where its use is performed on the basis of a legitimate interest and there is something about your situation which makes you want to object. There may be a compelling legitimate basis that overrides your rights, interests and freedoms, in which case your objection may not be accepted: for example, using personal information that relates to you to defend a legal claim. You also have the right to object where personal information about you is used for the purposes of direct marketing.
- **Request the restriction** of the use of personal information about you. This allows you to ask that the relevant personal information is not used for a period of time. For example, if you want to establish its accuracy.
- **Request the transfer** of personal information about you to another party where you provided it and its use is based on your consent, or to carry out a contract with you, and it is used automatically.
- **Withdraw consent.** If consent is the basis on which personal data about you is used, you have the right to withdraw your consent for that use. Once your notification of withdrawal is received the use must stop, unless there is a compelling legitimate interest not to do so.
- **Lodge a complaint.** If personal information about you is being used in a way that breaches data protection law, you have the right to lodge a complaint with your national data protection supervisory authority (if you are in the UK, this is the Information Commissioner's Office).