PRIVACY POLICY – REGISTERED COMPANIES USING SCRATCHSCRATCH

Last updated: May 2025

Red Blu Digital Advertising UG

Terminalstrasse Mitte 18, 85356 Munich, Germany

Company Register: HRB 297052

Email: administration@redblu.net

1. INTRODUCTION

This privacy policy is addressed to companies that register on the ScratchScratch platform to promote their products and services. It has been prepared in accordance with the UK General Data Protection Regulation (UK GDPR), the EU GDPR where applicable, and relevant national data protection laws.

2. DATA CONTROLLER

The data controller is:

Red Blu Digital Advertising UG

Email: administration@redblu.net

3. LEGAL BASIS FOR DATA PROCESSING

We process your data on the following legal bases:

- Performance of the service contract between you and Red Blu;
- Compliance with legal obligations;
- Legitimate interest in providing and improving the platform;
- Your explicit consent (where required, e.g. for marketing communications).

4. TYPES OF DATA COLLECTED

We may collect and process the following types of data:

- Company name and registration number (e.g., VAT, Companies House);
- Name and surname of your legal representative or contact person;
- Business email address and phone number;
- Registered office and billing address;
- Technical data such as IP address, access logs, browser type;
- Campaign interaction data (e.g., clicks, winners, published content).

5. PURPOSES OF PROCESSING

Your data will be used for the following purposes:

- Account creation and management;

- Publication and monitoring of promotional campaigns;
- Billing and accounting;
- Customer support;
- Sending service communications and technical notices;
- (With consent) Sending promotional and marketing materials.

6. DATA ACCESS AND SHARING

Data may be accessed only by:

- Internal staff at Red Blu authorised to manage company accounts;
- Sub-processors (IT providers, payment processors) under contractual obligation;
- Public authorities, where required by law.

Data is never sold or transferred to third parties for unrelated marketing purposes.

7. INTERNATIONAL DATA TRANSFERS

Data is stored on servers located within the UK, EU or in third countries with adequate protection levels. In case of transfer outside the UK/EU, standard contractual clauses (SCCs) or equivalent safeguards will be applied.

8. DATA RETENTION

Data is retained for as long as necessary to fulfill the above purposes or to comply with legal obligations (e.g., tax regulations). You may request deletion of your data at any time by contacting us.

9. YOUR RIGHTS

As a data subject, you have the right to:

- Access your data;
- Request correction or deletion;
- Restrict or object to processing;
- Request data portability;
- Withdraw consent at any time (where applicable).

To exercise your rights, contact: administration@redblu.net

We will respond within one (1) month in accordance with the UK GDPR.

10. DATA PROTECTION OFFICER (DPO)

For any privacy-related inquiries, you may contact our Data Protection Officer at:

dpo@redblu.net

11. COMPLAINTS

If you believe your data has not been processed in accordance with the law, you have the right to lodge a complaint with:

Information Commissioner's Office (ICO) – www.ico.org.uk

12. CHANGES TO THIS POLICY

We may update this privacy policy at any time. Companies will be notified via email or through the admin panel. Continued use of the platform implies acceptance of the updated policy.

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