

1. Data Controller

Oyster Unipessoal Lda(hereafter referred to as Oyster) – Rua Ribeira das Vinhas 259 1º Esq - 2750-477 - Cascais (Portugal)

Oyster contact email: manager@oysternetwork.com

Types of Data collected

As a client or as a potential client among the types of Personal Data that this online platform collects there are: email address, Cookies, Usage Data, password, first name, last name and Email.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection. Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using Oyster. Unless specified otherwise, all Data requested by Oyster is mandatory and failure to provide this Data may make it impossible for Oyster to provide its services. In cases where Oyster specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service. Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner. Any use of Cookies – or of other tracking tools – by Oyster or by the owners of third-party services used by Oyster serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, and confirm that they have the third party's consent to provide the Data to the Owner.

This will not be published or shared through by Oyster.

2. Mode and place of processing the Data

Methods of processing

Oyster takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of Oyster (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

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Legal basis of processing

Oyster may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which Oyster is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in Oyster;
- processing is necessary for the purposes of the legitimate interests pursued by Oyster.
- In any case, Oyster will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.



Place

The Data is processed at Oyster's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with Oyster using the information provided in the contact section.

3. Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between Oyster and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Oyster's legitimate interests shall be retained as long as needed to fulfil such purposes. Users may find specific information regarding the legitimate interests pursued by Oyster within the relevant sections of this document or by contacting Oyster.

Oyster may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Oyster may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

4. The purposes of processing

The Data concerning the User is collected to allow Oyster to provide its Services, as well as for the following purposes: Contacting the User, Registration and authentication, Handling payments, Infrastructure monitoring, Remarketing, Managing contacts and sending messages, Analytics, Commercial affiliation, Interaction with support and feedback platforms, User database management, Managing support and contact requests and Hosting and backend infrastructure.

Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective sections of this document.

5. Basic information

By default, this includes certain User's Data such as id, name, picture, gender, and their locale. Certain connections of the User, such as the Friends, are also available. If the User has made more of their Data public, more information will be available

6. Email

Provides access to the User's primary email address.

7. Insights

Provides read access to the Insights data for pages, applications, and domains the user owns.



8. Manage Pages

Enables Oyster to retrieve access_tokens for Pages and Applications that the user administrates.

9. Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Analytics

- *The services contained in this section enable Oysternetwork to monitor and analyze web traffic and can be used to keep track of User behaviour on Oysternetwork.com.*
- *Personal Data collected: Cookies and Usage Data.*
- *Place of processing: US – [Privacy Policy](#).*

·Google Analytics with anonymized IP (Google Inc.)

- *Google Analytics is a web analysis service provided by Google Inc. (“Google”). Google utilizes the Data collected to track and examine the use of Oyster, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.*
- *Personal Data collected: Cookies and Usage Data.*
- *Place of processing: US – [Privacy Policy](#) – [Opt Out](#).*

·User ID extension for Google Analytics (Google Inc.)

- *Google Analytics on Oyster makes use of a feature called User ID. This setup allows for a more accurate tracking of Users by associating that User with the same ID over various sessions and devices. It is set up in a way that doesn't allow Google to personally identify an individual or permanently identify a particular device. The User ID extension might make it possible to connect Data from Google Analytics with other Data about the User collected by Oyster. The opt-out link below will only opt you out for the device you are on, but not from tracking performed independently by the Owner. Contact the Owner via the email address provided in this privacy policy to object to the aforementioned tracking as well.*
- *Personal Data collected: Cookies.*
- *Place of processing: US – [Privacy Policy](#) – [Opt Out](#).*

10. Contacting the User

Mailing List or Newsletter (LinkedIn or by oysternetwork.com)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning Oyster. Your email address might also be added to this list as a result of signing up to Oyster or after making a purchase.

Personal Data collected: email address, telephone numbers.

12. Handling payments

Payment processing enables Oyster to process payments by bank transfer. To ensure greater security, Oyster shares only the information necessary to execute the transaction with the financial intermediaries handling the transaction. This may also enable the sending of timed messages to the User, such as emails containing invoices or notifications concerning the payment.



13. Hosting and backend infrastructure

This type of service has the purpose of hosting data and files that enable Oyster to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of Oyster. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

****PLEASE enter in here the AWS details****

14. Infrastructure monitoring

- This allows this Oyster to monitor the use and behaviour of its components so its performance, operation, maintenance and troubleshooting can be improved. Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of Oyster.
- Interaction with support and feedback platforms
- Managing contacts and sending messages
- Infrastructure monitoring

This makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User. These processes also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

- Managing support and contact requests
- This type of services allows Oyster to manage support and contact requests received via email or by other means, such as the contact form. The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

Registration and authentication

- By registering or authenticating, Users allow Oyster to identify them and give them access to dedicated services.
- The User registers by filling out the registration form and providing the Personal Data directly to Oyster.
- Personal Data collected: email address, unique user log-in ID and password.

User database management

This type of services allows Oyster to build user profiles by starting from an email address, a personal name, or other information that the User provides to Oyster. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Oyster can use for improving Oyster.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on Oyster.

15. Further information about Personal Data

Further rights of the Users

We don't sell or rent Users' Data to any third parties for any purpose. The only uses of Data are those highlighted in this policy. Users are the only owner of their Data and can request modification or deletion at any time.

16. The rights of Users

Users may exercise certain rights regarding their Data processed by Oyster. In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.



- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by Oyster, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, Oyster will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from Oyster.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

17. Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in Oyster or for the purposes of the legitimate interests pursued by Oyster, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether Oyster is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

18. How to exercise these rights

Any requests to exercise User rights can be directed to Oyster through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by Oyster as early as possible and always within one month.

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19. Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by Oyster in Court or in the stages leading to possible legal action arising from improper use of Oyster. The User declares to be aware that Oyster may be required to reveal personal data upon request of public authorities.

20. Additional information about User's Personal Data

In addition to the information contained in this privacy policy, Oyster may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

21. System logs and maintenance

For operation and maintenance purposes, Oyster and any third-party services may collect files that record interaction with Oyster (System logs) use other Personal Data (such as the IP Address) for this purpose.

22. Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from Oyster at any time. Please see the contact information at the beginning of this document.

23. How "Do Not Track" requests are handled

Oyster does not support "Do Not Track" requests. To determine whether any of the third-party services it uses honour the "Do Not Track" requests, please read their privacy policies.



24. Changes to this privacy policy

Oyster reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within Oyster and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to Oyster. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, Oyster shall collect new consent from the User, where required.

25. Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through Oyster which can include: the IP addresses or domain names of the computers utilized by the Users who use Oyster, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within Oyster) and the details about the path followed within Oyster with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using Oyster who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Oyster)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy. The Data Processor, unless otherwise specified, is Oyster.

Data Controller (or Oyster)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of Oyster.

Oyster

Means Oyster Unipessoal Lda.

Service

The service provided by Oyster as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Email

Provides access to the User's primary email address.



Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to Oyster, if not stated otherwise within this document.

