

## Privacy Policy

### 1. Scope and Responsibility

This data protection notice explains which personal data (Art. 4 para. 1 GDPR) we process when you use our website, mobile applications and services, for what purposes and on what legal basis, as well as which rights you are granted.

Controller (Art. 4 para. 7 GDPR):

Coral Club Distribution LTD, Agapinoros 52, 2nd floor, Flat/Office 1, 8049 Paphos, Cyprus

Registered in the Commercial Register of the Republic of Cyprus

Registration number: HE343977

Local contact office in Italy (not an independent data controller):

Royal Coral Club SRL

Via Coriano, 58 ; Bl. 34/F ; 47924 Rimini (RN), Italia

Tel.: +39 333 423 6501, +39 0541 39 5124

CF / P.IVA: 03739960403

Codice Destinatario: M5UXCR1

E-mail: [support.it@coral-club.com](mailto:support.it@coral-club.com)

The data protection support center, which contains answers to frequently asked questions, instructions on exercising your rights and configuring your account, is available via the link at the bottom of our website.

This data protection notice applies to all websites and online services operated by Coral Club Distribution LTD, unless otherwise stated.

### 2. What data we collect

We collect personal data only to the extent necessary to provide our services, to fulfil contractual or legal obligations, on the basis of your consent, or to protect our legitimate interests (Art. 6(1)(a), (b), (c), (f) GDPR).

When storing or accessing information on end-user devices, the requirements of Italian legislation apply, including Legislative Decree 196/2003 (Codice Privacy) and the ePrivacy Directive 2002/58/EC, which regulate the use of cookies and similar technologies.

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## Web Hosting (Art. 6(1)(f) GDPR)

We use a European hosting provider to host this website.

Your IP address and server log files are processed on our behalf.

A data processing agreement has been concluded with the provider (Art. 28 GDPR).

Server location: EU/EEA. If data is transferred to third countries, Art. 45/46 GDPR (DPF/SCC) applies.

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## When visiting the website (server logs) (Art. 6(1)(f) GDPR)

Your browser transmits technically necessary data (for example, IP address, date/time, browser/OS information, referring URL).

The IP address is stored for no more than 30 days in log files and is then automatically deleted (to ensure IT security, stability, and error analysis).

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## Contact Form / Email (Art. 6(1)(b) or (f) GDPR)

We collect only the data necessary (Art. 5(1)(c) GDPR).

Mandatory fields: club number, name, email address, message.

Optional field: phone number (for faster feedback).

You may also contact us directly by email; the data is deleted after the request is completed, unless otherwise required by law.

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## Personal Account (Club Member) (Art. 6(1)(b) GDPR)

To create an account, we collect your email address, first name, last name, and address.

Optional: phone number, gender.

Date of birth — only if required to verify age or identity (for example, for specific payment methods).

Account deletion is possible by request to [rccsr@gmail.com](mailto:rccsr@gmail.com); legal data retention obligations continue to apply (Art. 6(1)(c) GDPR).

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## Guest Order (Order Without Registration) (Art. 6(1)(b) GDPR)

Required data: first name, last name, address, email, payment details (depending on payment method).

Date of birth — only when paying by invoice (for creditworthiness checks; Art.

6(1)(f) GDPR).

Data retention is carried out in accordance with Italian commercial and tax law, including:

- Codice Civile,
  - DPR 633/1972 (VAT),
  - DPR 600/1973 (tax records).
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#### “Extended Information” Option (Art. 6(1)(a) GDPR)

This feature is disabled by default.

You may selectively allow the display of:

- (i) contact details (email/phone),
- (ii) messenger IDs,
- (iii) participation in events,
- (iv) purchase history for the last 3 months.

Only the data activated by you in your personal account is displayed.

Consent may be withdrawn at any time via account settings (Art. 7(3) GDPR).

We remain responsible for lawful provision and access control for this feature.

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#### Newsletter

Legal basis: Art. 6(1)(a) GDPR, Double Opt-In.

Tracking of opens and clicks — only with consent.

Unsubscribing is possible via the “Unsubscribe” link or by email.

The Double Opt-In process is stored as proof of consent (Art. 6(1)(f) GDPR).

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#### Competitions / Surveys (Art. 6(1)(b) or (a) GDPR)

The data collected depends on the specific activity.

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#### Communication Channels — Overview

**Telephone:** name, number, subject of inquiry (Art. 6(1)(b)/(f) GDPR).

**Email:** sender address, content of the message (Art. 6(1)(b)/(f) GDPR).

**WhatsApp / Telegram:** see dedicated sections below.

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#### WhatsApp (Business Platform) (Art. 6(1)(b)/(f) GDPR)

Contact via Click-to-Chat or saved number.

Processed data: phone number, name, messages, metadata.

Data transfer to the USA: based on DPF/SCC.

Use is voluntary; alternatives include phone or email.

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#### Telegram (Art. 6(1)(b)/(f) GDPR)

Processed data: username, phone number (if available), messages, metadata.

Cloud chats are not end-to-end encrypted; secret chats are end-to-end encrypted.

Provider: Telegram FZ-LLC (UAE).

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#### Social Media (Facebook, Instagram, TikTok, X/Twitter, etc.)

When visiting our pages, data may be processed for marketing and analytics.

If processing purposes are jointly determined, Art. 26 GDPR (joint controllership) applies.

### 3. How We Use the Information

We process personal data for the following purposes:

Provision of services / IT security (log files):

Art. 6(1)(f) GDPR.

Contract performance (account, orders, support):

Art. 6(1)(b) GDPR.

Data retention — Art. 6(1)(c) GDPR in accordance with the Codice Civile and Italian tax regulations.

Newsletter:

Double Opt-In, Art. 6(1)(a) GDPR;  
withdrawal of consent — Art. 7(3) GDPR.

Competitions / surveys:

Art. 6(1)(b) or (a) GDPR.

Analytics / marketing (cookies / pixels):

Only with consent — Art. 6(1)(a) GDPR.

Payments / delivery:

Art. 6(1)(b) GDPR;  
where required — Art. 6(1)(c) GDPR.

Marketing to existing customers:

Art. 6(1)(f) GDPR;  
objection possible at any time.

Requirements of governmental authorities:

Art. 6(1)(c) GDPR.

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#### Recipients / Data Processors (Art. 13(1)(e), Art. 28 GDPR)

Hosting, cloud services,  
IT support,  
payment systems,  
delivery services,  
CRM systems,  
mailing services,  
analytics services,  
consent management systems.

Data processing agreements have been concluded with all processors.

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#### Intra-Group Transfers (Art. 6(1)(b)/(f) GDPR)

Data may be transferred within the corporate group:

- to fulfil contracts,
- for centralized support, IT, and compliance,
- in accordance with GDPR and Intra-Group Agreements (Art. 46(2)(c) GDPR).

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#### Transfer of Data to Third Countries (Art. 44 et seq. GDPR)

Permitted only if:

- an adequacy decision exists (Art. 45 GDPR), or
- appropriate safeguards are in place (Art. 46 GDPR, SCC).

For the USA — EU-US Data Privacy Framework.

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## Right to Object (Art. 21 GDPR)

You may object to the processing of your data at any time.

For marketing purposes — without explanation.

Send an objection to:

**[support.it@coral-club.com](mailto:support.it@coral-club.com)**

## 4. Compliance with legislative, regulatory, and criminal-law requirements

### **Art. 6(1)(c) GDPR – fulfilment of legal obligations**

(for example, obligations to provide information, to store data in accordance with Italian commercial and tax legislation, including the requirements of the *Codice Civile*, *DPR 600/1973*, *DPR 633/1972 (IVA)*, as well as accounting and tax obligations established under applicable Italian law).

### **Art. 6(1)(f) GDPR – protection of legitimate interests**

(for example, ensuring the security of systems, and the protection of the company's rights and interests).

Italian law also does not contain a direct equivalent to §§ 24 and 26 BDSG.

Therefore, the relevant provisions of the GDPR apply, namely:

**Art. 6(1)(c) and Art. 6(1)(f) GDPR** — when processing is necessary to comply with legal obligations, to satisfy the requirements of public authorities, to prevent threats, to protect legal claims, or to fulfil obligations to cooperate with law enforcement authorities under applicable Italian legislation;

as well as **Art. 9(2)(f) and Art. 9(2)(g) GDPR** — when processing concerns the protection of the company's rights, legal proceedings, or processing carried out on grounds of substantial public interest.

### **Art. 32 GDPR – ensuring the security of processing**

(technical and organisational measures, IT security concepts, access control, server protection, system monitoring).

We inform you, to the extent permitted by law, of cases where data must be disclosed in accordance with Art. 14(4) GDPR, provided that such disclosure does not contradict statutory confidentiality obligations, government investigations, or public safety requirements.

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## Analytical functions and technical security (Art. 6(1)(f) GDPR)

When technically necessary analytical or protective functions are used, data (such as IP address, browser information, pages visited) is processed to ensure the

stability, security, and usability of our website.

Information collected through these tools may be transferred to servers located in third countries (for example, the United States).

If no adequacy decision exists under Art. 45 GDPR, such transfer is carried out on the basis of appropriate safeguards under Art. 46 GDPR (for example, the EU Standard Contractual Clauses — SCC).

Additional information is available in the privacy policies of the respective providers.

## 5. Third-Party Websites

Our website may contain links to websites of other providers to which this Privacy Policy does not apply.

If you follow a link to a third-party website, please note that we do not control the content or the data-processing practices of those providers.

We recommend that you review their current privacy policies.

If third-party elements are embedded on our website (for example, Google Maps, YouTube videos, social media plug-ins or other external tools), this is carried out:

— **on the basis of your consent under Art. 6(1)(a) GDPR**,  
in conjunction with the requirements of **Directive ePrivacy 2002/58/EC, D.lgs. 196/2003 (Codice Privacy)**, and **D.lgs. 101/2018**, which regulate the use of cookies and similar technologies in Italy,

— **or to protect our legitimate interests**—providing an attractive, functional, and user-friendly online offering—under **Art. 6(1)(f) GDPR**.

In these cases, third-party providers may process your IP address to correctly display the relevant content. We cannot influence this data-processing activity.

If you do not want third-party providers to collect, process or use data about you, you can disable JavaScript in your browser or block the loading of such content using additional browser extensions.

However, please note that doing so may limit the functionality of our website.

If data is transferred to third countries (for example, the United States), such transfer is carried out exclusively in accordance with **Art. 44 et seq. GDPR** (adequacy decision or appropriate safeguards, including the **EU–US Data Privacy Framework (DPF)** or the **EU Standard Contractual Clauses — SCC**).

## **6. How to Access, Update, or Delete Your Data**

As a data subject within the meaning of Art. 4(1) GDPR, you have the following key rights with respect to us:

### **Right of Access (Art. 15 GDPR)**

You may request confirmation as to whether we process your personal data, and obtain information about such data and other details required by law.

### **Right to Rectification (Art. 16 GDPR)**

You may request the immediate correction of inaccurate personal data or the completion of incomplete personal data stored by us.

### **Right to Erasure ("Right to Be Forgotten") (Art. 17 GDPR)**

You may request the deletion of your personal data unless statutory retention obligations or other legal grounds prevent this.

### **Right to Restriction of Processing (Art. 18 GDPR)**

You may request that the processing of your data be restricted in certain cases.

### **Right to Data Portability (Art. 20 GDPR)**

You may request to receive your personal data in a structured, commonly used, machine-readable format or to have it transmitted to another controller.

### **Right to Object (Art. 21 GDPR)**

You may object at any time to the processing of your personal data for reasons relating to your particular situation when the processing is based on Art. 6(1)(e) or Art. 6(1)(f) GDPR.

### **Right to Withdraw Consent (Art. 7(3) GDPR)**

You may withdraw consent previously given at any time with effect for the future.

### **Right to Lodge a Complaint with a Supervisory Authority (Art. 77 GDPR)**

If you believe that the processing of your personal data violates the GDPR, you



may lodge a complaint with a national data-protection authority.

In Italy, the competent authority is:

**Garante per la Protezione dei Dati Personali**

Piazza Venezia 11, 00187 Rome, Italy

Website: [www.garanteprivacy.it](http://www.garanteprivacy.it)

Tel.: +39 06 69677 1

E-mail: [protocollo@gpdp.it](mailto:protocollo@gpdp.it)

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To view, update, or delete your personal data, log into your personal account and open the “**Settings**” section (Art. 12(2) GDPR — obligation of the controller to facilitate the exercise of rights).

You may also contact us at [rccsrl@gmail.com](mailto:rccsrl@gmail.com) to receive additional information and instructions on exercising your rights.

We will respond to your request without undue delay and no later than within one month of receipt (Art. 12(3) GDPR).

If your request is complex or if we receive a high number of requests, the period may be extended by a further two months.

We will notify you of any extension in advance (Art. 12(3), second sentence GDPR).

Please note that, in order to protect your data from unauthorised access, we are required to verify your identity before disclosing information or making changes (Art. 12(6) GDPR).

The exercise of your rights is free of charge (Art. 12(5) GDPR).

However, in cases of clearly unfounded or excessive requests within the meaning of Art. 12(5), second sentence GDPR, we reserve the right to charge a reasonable fee or to refuse to act on the request.

## **7. How We Protect, Store, and Retain Your Data**

We process and store personal data in accordance with the principles of data minimisation, integrity, and confidentiality as set out in **Art. 5(1)(c) and (f) GDPR**.

To achieve this, we implement technical and organisational measures in accordance with **Art. 24 and Art. 32 GDPR**, ensuring a level of protection appropriate to the degree of risk.

In particular, the following measures are used:

- **Encryption of data transmission** (e.g., TLS / SSL);

- **Firewall systems**, access control, and role-based authorisation structures;
  - **Regular security tests**, IT infrastructure audits, and penetration testing;
  - **Staff training and awareness-raising** regarding data protection and information security.
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## Data Retention

We store personal data only for as long as necessary to provide the services requested by you, or when storage is required by law (**Art. 5(1)(e) GDPR**).

Specific retention periods are determined on the basis of the following criteria:

### Performance of a Contract

Data is retained until the full completion of contractual performance and the expiry of warranty or contractual periods (**Art. 6(1)(b) GDPR**).

### Commercial and Tax Obligations in Italy

Data is stored in accordance with:

- **Codice Civile** (Italian Civil Code) — general retention period for business documentation is **10 years**;
- **TUIR — Testo Unico delle Imposte sui Redditi** (Italian Consolidated Income Tax Act) — tax documentation must be stored for **10 years**, counting from the end of the financial year;
- **D.P.R. 600/1973** and **D.P.R. 633/1972** — obligations regarding retention of accounting and fiscal documentation (**Art. 6(1)(c) GDPR**).

## Legal Requirements

Data is retained until the expiry of the relevant limitation periods under the Codice Civile:

- standard limitation period: **10 years**;
- certain obligations: **5 years** (e.g., periodic payments).

This retention is necessary for the establishment, exercise, or defence of legal claims (**Art. 6(1)(f) GDPR**).

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## Deletion or Anonymisation

After the respective retention periods expire, personal data is deleted or anonymised unless otherwise required by law or unless other lawful grounds justify continued storage (**Art. 17 GDPR**).

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## Contact for Data Protection Questions

If you have any questions regarding data protection or data retention periods, you may contact us at:

**[rccsrl@gmail.com](mailto:rccsrl@gmail.com)**

## 8. Do Not Track Signals and Age Restrictions

Our services are intended exclusively for individuals who are at least 18 years old. The age restriction is implemented to protect minors and to comply with legal requirements, in particular with the principle of lawfulness and transparency of data processing as set out in **Art. 5(1)(a) GDPR**, as well as **Art. 6(1)(f) GDPR** (legitimate interest in ensuring the safety of minors and preventing unauthorised access to our services).

We do not knowingly collect personal data from individuals under 18 years of age. If you become aware of or have reason to believe that a person under the age of 18 has provided us with their personal data, please contact us immediately at:

**[rccsrl@gmail.com](mailto:rccsrl@gmail.com)**

We will promptly delete such data in accordance with **Art. 17 GDPR**.

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## Do-Not-Track Signals

Our websites currently do not respond to so-called browser “Do Not Track” signals. Nevertheless, all personal data is processed strictly in accordance with this Data Protection Notice and the provisions of **Art. 5 and Art. 6 GDPR**, as well as — when accessing users’ devices — the requirements of Italian cookie legislation, including:

- **D.lgs. 196/2003 (Codice della Privacy),**
- **D.lgs. 101/2018,**
- **Garante Privacy “Cookie and Other Tracking Tools Guidelines” (2021).**

Compliance with the age restriction and data protection principles forms part of our organisational and technical measures implemented pursuant to **Art. 24 and Art. 32 GDPR**.

We reserve the right to amend these provisions in the event of changes to legal or technical requirements.

## 9. Use of Photo and Video Materials at Events

During Coral Club corporate events (conferences, forums, seminars, training programs, plenary meetings, presentations, and other activities), photo and video recordings may be carried out. Such materials are created for documenting company activities, improving internal and external communications, and informing about the company's work.

The processing of photo and video materials is carried out on the following legal bases:

- **Art. 6(1)(f) GDPR** — the legitimate interest of the company in documenting and communicating its activities;
- **Art. 6(1)(a) GDPR** — consent, if such consent is required in specific situations (for example, in the case of individual close-up recordings).

The recorded materials may include images of event participants and may be used on the official Coral Club websites, corporate social media accounts, presentations and other communication materials of the company, strictly in accordance with applicable law and the stated purposes.

An event participant has the right to object at any time to the processing of their personal data in accordance with **Art. 21 GDPR**, or to withdraw previously given consent (**Art. 7(3) GDPR**) by sending a request to: **rccsrl@gmail.com**.

Upon receiving an objection or a withdrawal of consent, the company will stop any further use of the relevant materials and, where possible, will delete images already published.

It should be noted that during wide-angle recordings, group photos or public events, it may not always be technically possible to ensure the complete exclusion of individual participants from the frame. In such cases, the processing is based on the company's legitimate interest (**Recital 47 GDPR**).

## 10. Changes to Our Privacy Policy

We reserve the right to modify this Privacy Policy at any time to reflect changes in legislation, technical developments, or updates to our services.

When changes are made, we comply with transparency and information obligations in accordance with **Art. 12** and **Art. 13(3) GDPR**.

Material changes that affect the purposes of data processing or the categories of data processed will be communicated to you in advance — for example, by email or via a prominent notice on the homepage of our website — **at least 30 days before the changes take effect (Art. 13(3) GDPR)**.

If the changes concern processing activities based on consent (**Art. 6(1)(a) GDPR**), we will request your consent again if the changes are material and are not covered by the original consent (**Art. 7(3) GDPR**).

The current version of this Privacy Policy is always available on our website via the corresponding link.

Previous versions may be provided upon request in accordance with **Art. 15 GDPR**.

**Version of this Privacy Policy: October 2025.**

## 11. Data Protection Authority

You have the right to lodge a complaint with any supervisory data protection authority (**Art. 77 GDPR**), in particular in the Member State of your habitual residence, your place of work, or the place where you believe a violation has occurred.

**Lead supervisory authority based on the location of the data controller (Cyprus):**

**Office of the Commissioner for Personal Data Protection**

1 Iasonos Str., 1082 Nicosia, Cyprus

Website: [www.dataprotection.gov.cy](http://www.dataprotection.gov.cy)

**Local supervisory authority in Italy (based on the location of the local representative):**

**Garante per la Protezione dei Dati Personali (Garante Privacy)**

Piazza Venezia, 11

00187 Rome, Italy

Telephone: **+39 06 696771**

E-mail: [protocollo@gpdp.it](mailto:protocollo@gpdp.it)

Website: [www.gpdp.it](http://www.gpdp.it)

## 12. Contact Us

If you have any questions, comments, or complaints regarding this Privacy Policy or the processing of your personal data, you may contact us at any time.

We ensure that all requests are handled in accordance with the transparency and information obligations under **Art. 12, Art. 13(1)(a–b) and Art. 15 GDPR**.

### **Primary contact (data controller):**

#### **Coral Club Distribution LTD**

Agapinoros 52, 2nd floor, Flat/Office 1

8049 Paphos, Cyprus

Registered in the Commercial Register of the Republic of Cyprus

Registration Number: **HE343977**

### **Local contact in Italy**

(contact person, not an independent data controller):

#### **Royal Coral Club SRL**

Via Coriano, 58 ; Bl. 34/F

47924 Rimini (RN), Italy

Tel.: **+39 333 423 6501**

Tel.: **+39 0541 39 5124**

CF / P. IVA: **03739960403**

Codice Destinatario: **M5UXCR1**

E-mail: [rccsrl@gmail.com](mailto:rccsrl@gmail.com)

We recommend transmitting confidential information only in encrypted form (**Art. 32 GDPR — security of processing**).

We generally respond to requests without undue delay and no later than one month after receipt of the request (**Art. 12(3) GDPR**).

If the request is complex or if we receive a large number of requests, this period may be extended by an additional two months.

We will inform you of any extension in advance (**Art. 12(3), second sentence GDPR**).

## 13. Tracking Technologies

We use cookies and similar technologies (such as web beacons, pixels, and local storage) to ensure functionality, security, content personalisation, and analysis of the use of our services.

The storage of information on your device or access to such information is governed by **Art. 122 of the Italian Personal Data Protection Code (D.lgs. 196/2003, as amended by the GDPR)**, which aligns with European requirements on the use of cookies.

## Technically Necessary Technologies

These are required to ensure the operation of our website.

Legal basis:

- **Art. 122(1) Codice Privacy** (exception for necessary cookies — consent is not required);
  - **Art. 6(1)(f) GDPR** (legitimate interest in maintaining a functional and secure website).
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## Analytical, Marketing, and Personalisation Technologies

Used only with your consent.

Legal basis:

- **Art. 122(1-bis) Codice Privacy** (consent required for cookies that are not technical);
- **Art. 6(1)(a) GDPR** (voluntary consent, withdrawable at any time under **Art. 7(3) GDPR**).

You may withdraw or modify your consent at any time via the “Cookie Settings” link at the bottom of the website (**Art. 7(3) GDPR**).

You may also disable certain technologies in your browser settings; however, some website functions may become unavailable.

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## Types of Technologies Used

### Session Cookies

Automatically deleted after the session ends.

Legal basis:

- **Art. 122(1) Codice Privacy**;
- **Art. 6(1)(f) GDPR**.

### Persistent Cookies / Local Storage

Stored for a defined period (e.g., preferences, settings, login data).

Legal basis depends on the purpose:

- **Art. 6(1)(a) GDPR** (if consent is required);
- **Art. 6(1)(f) GDPR** (legitimate interest).

Pixels / Web Beacons

Used to measure interactions and performance.

Legal basis: **Art. 6(1)(a) GDPR**.

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Tools Used (Examples)

Google Analytics 4 (GA4)

Purpose: web analytics, measuring reach and user behaviour.

Features:

- The IP address is not permanently stored; it is used only for geolocation.
- User and event data are retained for up to 14 months (depending on configuration).

Legal basis:

- **Art. 122 Codice Privacy** (consent required),
- **Art. 6(1)(a) GDPR**.

Data transfer to third countries:

- United States — based on the **EU-US Data Privacy Framework (Art. 45 GDPR)**,  
or based on **Art. 46 GDPR** guarantees (Standard Contractual Clauses).

A Data Processing Agreement is in place.

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Mixpanel

Purpose: product and event analytics.

Used only with your consent.



Privacy Policy: <https://mixpanel.com/legal/privacy-policy/>

Singular

Purpose: advertising campaign attribution.

Used only with your consent.

Privacy Policy: <https://www.singular.net/privacy-policy/>

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## Transfers of Data Outside the EU / EEA

Performed only if:

- an adequacy decision exists (**Art. 45 GDPR**), e.g., for recipients certified under the EU–US DPF; or
- appropriate safeguards are provided (**Art. 46 GDPR**), such as Standard Contractual Clauses (SCC).

Additional information is available in the privacy policies of the respective providers.

## 14. Contact Addresses of Third-Party Providers

When external content or functionalities are integrated, the respective providers process data under their own responsibility (**Art. 4(1) GDPR**).

When data is transferred to third countries, we ensure compliance with **Art. 45/46 GDPR** (EU–US Data Privacy Framework — DPF or Standard Contractual Clauses — SCC).

Additional information can be found in the privacy policies of the respective providers.

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Google Maps

### Google Ireland Limited

Gordon House, Barrow Street, Dublin 4, Ireland

Purpose: display of maps and locations

Privacy Policy: <https://policies.google.com/privacy>

Data transfer to the United States: EU–US Data Privacy Framework or safeguards pursuant to **Art. 46 GDPR**.

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Meta (Facebook / Instagram)

**Meta Platforms Ireland Limited**

4 Grand Canal Square, Dublin 2, Ireland

Privacy Policies:

<https://www.facebook.com/privacy/policy>

<https://privacycenter.instagram.com/policy>

Joint controllership applies for the “Page Insights” function pursuant to **Art. 26 GDPR**.

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X (Twitter)

**Twitter International Unlimited Company**

One Cumberland Place, Fenian Street, Dublin 2, Ireland

Privacy Policy: <https://twitter.com/privacy>

Data transfer to the United States: safeguards pursuant to **Art. 46 GDPR**.

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YouTube

**Google Ireland Limited**

Gordon House, Barrow Street, Dublin 4, Ireland

Purpose: embedding video content

Privacy Policy: <https://policies.google.com/privacy>

Data transfer to the United States: EU–US Data Privacy Framework or safeguards pursuant to **Art. 46 GDPR**.