

# PRIVACY STATEMENT

Last Updated: May 2018

At Makmende Media we take your privacy very seriously and we are committed to protecting your personal data.

This privacy statement explains how we manage your personal data. It includes details of how we collect, store, use, record, hold, transfer and disclose your personal data. If you wish to contact us regarding this privacy statement, please see the contact details set out [below](#).

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

- [ABOUT MAKMENDE MEDIA](#)
- [DATA WE COLLECT FROM YOU OR ABOUT YOU](#)
- [HOW WE USE YOUR PERSONAL DATA AND THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA](#)
- [MARKETING AND YOUR CHOICES](#)
- [HOW WE SHARE AND DISCLOSE YOUR PERSONAL DATA](#)
- [RETENTION OF PERSONAL DATA](#)
- [HOW WE STORE AND SECURE YOUR PERSONAL DATA](#)
- [YOUR LEGAL RIGHTS](#)
- [COOKIES](#)
- [CHANGES TO THIS STATEMENT](#)
- [QUERIES, COMMENTS, REQUESTS AND COMPLAINTS](#)
- [CONTACT US](#)

## ABOUT MAKMENDE MEDIA

This privacy statement is issued by Makmende Media BV, but applies to the handling of personal data by each Makmende operating company.

The websites and applications of Makmende Media include:

- [www.makmendemedia.com](http://www.makmendemedia.com)
- [www.makmendemedia.org](http://www.makmendemedia.org)
- [www.africa-interactive.com](http://www.africa-interactive.com)
- [www.africa-interactive.nl](http://www.africa-interactive.nl)
- [www.afrika-nieuws.nl](http://www.afrika-nieuws.nl)

each a **MAKMENDE Website** and together the **MAKMENDE Group Websites**.

## DATA WE COLLECT FROM YOU OR ABOUT YOU

Your personal data includes any information that you provide to us, that we collect or that we are provided with by third parties and that identifies you, or from which you are identifiable, whether directly or indirectly. We may collect, use, store and transfer the following personal data about you:

- Data you give us
  - by filling in forms on a MAKMENDE Website;
  - when you use a MAKMENDE Website;
  - when you sign up to receive email updates from us;
  - when you ask us to provide you with marketing communications such as newsletters, updates or information about special events or promotions;
  - if you ask us to keep in touch with you or provide you with personalised content (such as targeted advertising);
  - if you contact us or correspond with us (for example, by phone, email or otherwise) for any reason; or
  - when you provide us with comments, opinions and/or feedback about MAKMENDE.
  
- Data we collect about you when you visit or use a MAKMENDE Website
  - technical information, including the type of device you use to access the MAKMENDE Website, the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug in types and versions, operating systems, mobile network information and platform and details of any referring website or application; and
  - information about your visit to the MAKMENDE Website including full Uniform Resource Locators (URL), clickstream to, through and from the MAKMENDE Website (including date and time), pages you viewed, page response time, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs).
  
- Data we collect from or are provided with by third parties. We may be given information about you from third parties, such as social media platforms .We may also collect information that is publicly available, for example, when we interact with you through social media.

## HOW WE USE YOUR PERSONAL DATA AND THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

MAKMENDE uses the personal data strictly for relevant purposes. Where we have a legal basis to use your personal data without consent, this privacy statement fulfills our duty to process personal data fairly and lawfully and in a manner that you would expect given the nature of our relationship with you, by giving you appropriate notice and explanation of the way in which your personal data will be used.

Where consent is required for our use of your personal data as described above, we will request your consent. Typically, we would collect your consent by you performing an action such as ticking the appropriate consent box or otherwise communicating your consent to us (for example, by email or by you providing us with non-mandatory information), you consent to our use of that personal data as set out in this privacy statement.

WE WILL NEVER SELL THE DATA WE COLLECT FROM OR ABOUT YOU!

## MARKETING AND YOUR CHOICES

Where you have consented to receiving our direct marketing online this means that you could be presented with our advertisements while using the MAKMENDE Websites. For example, if you have given us this consent we may run a Facebook advertisement campaign, which could include our advertisements being presented to you while you are on Facebook. We will only provide you with marketing communications if you would like us to. You will have the opportunity to clearly set out whether you wish to receive marketing messages from us by ticking the relevant boxes.

## HOW WE SHARE AND DISCLOSE YOUR PERSONAL DATA

We may share or disclose your personal data in connection with the purposes described in this privacy statement. This may include sharing your personal data with the following:

- professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;
- government or other law enforcement agencies, in connection with the investigation of unlawful activities or for other legal reasons;
- analytics and search engine providers that assist us in the improvement and optimization of the MAKMENDE Websites.

## RETENTION OF PERSONAL DATA

Your personal data will only be retained for as long as it is necessary to fulfill the purposes for which it was collected as outlined in this privacy statement and for the purpose of satisfying our business (accounting and reporting) or legal requirements, but also to properly resolve disputes or to troubleshoot problems.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you choose to unsubscribe from our mailing list your personal data will only be retained on our database insofar and to the extent permitted by law.

## HOW WE STORE AND SECURE YOUR PERSONAL DATA

We are committed to taking appropriate measures designed to keep your personal data secure. Our technical and organizational procedures are designed to protect your personal data from accidental, unlawful or unauthorized loss, access, disclosure, use, alteration, or destruction. While we make efforts to protect our information systems, no website, mobile application, computer system, or transmission of information over the Internet or any other public network can be guaranteed to be 100% secure. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorized access or inadvertent disclosure.

The personal data that we hold about you will be stored either on our servers or using third party data storage providers in The Netherlands. We may post a notice on the MAKMENDE Website, notify you by email or contact you otherwise if a security breach occurs and such breach presents a high risk to your rights and freedoms.

## YOUR LEGAL RIGHTS

You have the following rights with regard to your personal data:

- **Access.** You have the right to access data we hold about you. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Rectification or erasure.** You have the right to request that we rectify or delete any personal data that we hold about you (unless we have the legal right to retain it). This right does not extend to non-personal data. Please note that your rights to request erasure may be limited by applicable law.
- **Restriction.** You also have the right to restrict us from processing your personal data if the data is inaccurate, the processing is unlawful or we no longer need to your personal data for the purposes for which we hold it.

- Data portability. You have the right to obtain personal data we hold about you, in a structured, electronic format.
- Complaints. If for any reason you are not happy with the way that we have handled your personal data, please see [below](#) for further information and contact us. If you are still not happy, you have the right to make a complaint to the Data Privacy Office. To exercise any of the rights mentioned above, please contact us using the contact details [below](#).

This does not include your right to object to the processing of your personal data for the purposes of direct marketing. You can exercise this right at any time without restrictions. Please allow at least 3 working days for your request to be actioned.

To protect your confidentiality and to comply with applicable data protection laws, we may need to confirm your identity before we can action your request. When contacting the Data Privacy Office (details of which you can find [below](#)), please state your name and provide valid contact details.

## COOKIES

A “cookie” is a small text file that is placed onto an Internet user’s web browser or device and is used to remember and/or obtain information about the user and a “web beacon” is a small object or image that is embedded into a web page, application, or email and is used to track activity, which are also sometimes referred to as pixels and tags.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of the MAKMENDE Websites.
- Analytical/performance cookies. They allow us to recognize and count the number of visitors and to see how visitors move around the MAKMENDE Websites when they are using it. They also enable us to see how users use the MAKMENDE Websites. This helps us to improve the way the Websites work.
- Functionality cookies. These are used to recognize you when you return to the MAKMENDE Websites. This enables us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies. These cookies record your visit to the MAKMENDE Websites, the pages you have visited and the links you have followed. We will use this information to make the website and the advertising displayed on it more relevant to your interests.

By clicking “agree” on the cookie consent box when you first access a MAKMENDE Website and by continuing to access and use such MAKMENDE Website you accept our use of the cookies. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the MAKMENDE Website.

For more detailed information about cookies and how they can be managed and deleted, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## CHANGES TO THE PRIVACY STATEMENT

This privacy statement is in effect as of the date noted at the top of the statement. We may change our privacy statement from time to time. Any changes we may make to our privacy statement in the future will be posted on this page and, where appropriate, notified to you by e-mail.

Please check back frequently to see any updates or changes to our privacy statement. By continuing to use a MAKMENDE Website or continuing to allow us to retain or process your personal data following any such changes to our privacy statement, you are deemed to have accepted such changes unless you expressly notify us otherwise in writing (except to the extent we are required to make such changes in accordance with applicable law).

Where we need to seek updated, additional or different consents from you, we will, of course, do so.

## QUERIES, COMMENTS, REQUESTS AND COMPLAINTS

If you have any questions, comments, requests or complaints about our collection, use or disclosure of personal data, or regarding this privacy statement, please contact us using the details [below](#). Please also contact us if you would like to update or amend any of your personal data which you have provided to us or if you believe our records relating to your personal data are incorrect. When contacting us please provide as much detail as possible in relation to your question, comment, request or complaint.

## CONTACT US

MAKMENDE MEDIA BV

F.a.o. Data Privacy Office

Van Diemenstraat 160

1013CN Amsterdam

+31 2042 31644