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# StreamDNA's Privacy Policy

## Why and who?

StreamDNA cares about privacy and protecting all Personal Data handled by us.

This Policy describes how and why we use your Personal Data, the lawful basis on which we use your Personal Data and what measures we take to protect it. It also provides information on how to exercise your rights in connection with our Processing of Personal Data.

StreamDNA Ltd Reg. No. (13263813) (**StreamDNA, we, us, our**) is the Controller of all Personal Data listed in this Privacy Policy (the **Policy**). ChannelCrawler is a trading name of StreamDNA Ltd.

This Policy provides information on how we handle Personal Data and Public Data when you communicate with us, use the Services, make your Personal Data publicly available, or visit our website, <https://channelcrawler.com/>. This Policy was drafted by GZ Legal ([www.gzlegal.co.uk](http://www.gzlegal.co.uk)).

## Data subjects and storage time:

The intended recipients of this Policy are the following groups, whose data we store in accordance with the criteria set out below.

- Users of the Services:  
Personal Data of the users will be stored during the period that they use the Service and to comply with legal obligations, such as handling alleged errors in the Service.
- Potential customers:  
Personal Data of potential customers will be stored during the period required to determine whether or not they wish to enter into an agreement.
- Owners of YouTube channels featured in our database:  
Personal Data will be stored for the period necessary to meet our legitimate interests.

## Definitions

**Applicable Law** refers to the legislation applicable to the Processing of Personal Data, including the UK GDPR, supplementary national legislation, as well as practices, guidelines and recommendations issued by the Commissioner or other relevant regulatory authority.

**Commissioner** means the Information Commissioner's Office (the UK regulator for data protection issues).

**Controller** is the company/organisation that decides for what purposes and in what way Personal Data is to be processed and is responsible for the Processing of Personal Data in accordance with Applicable Law.

**Data Subject** is the living, natural person whose Personal Data is being processed.

**Personal Data** is all information relating, directly or indirectly, to an identifiable natural person.

**Processing** means any operation or set of operations which is performed on Personal Data, such as storage, modification, reading, handover and similar.

**Processor** is the company/organisation that processes Personal Data on behalf of the Controller and can therefore only process the Personal Data according to the instructions of the Controller and the Applicable Law.

**Public Data** is any information that is made publicly available, such as information that a Data Subject uploads to social media sites. Public Data may include Personal Data.

**Services** means access to our database.

**UK GDPR** means the retained EU law version of the General Data Protection Regulation ((EU) 2016/679).

The definitions above shall apply in the Policy regardless of whether they are capitalised or not.

## StreamDNA's role as a Controller

The information in this Policy covers Personal Data Processing for which StreamDNA is the Controller. As a Controller we are responsible for the Processing for which we decide the purpose of (the why) and the means of the Processing (what methods, what Personal Data and how long the Personal Data is stored). The Policy does not describe how we Process Personal Data in the role of a Processor (i.e. when we process Personal Data on behalf of our customers).

## StreamDNA's Processing of Personal Data

We have a responsibility to describe and demonstrate how we fulfil the requirements that are imposed on us when we Process your Personal Data. This section aims to give you an understanding of what type of Personal Data we Process and the lawful basis on which we Process that Personal Data.

### Legal basis

In order for us to be able to process your Personal Data, it is required that we have so-called legal basis for each process. In our business, we process your Personal Data mainly on the following grounds:

**Consent** - StreamDNA may process your Personal Data after you have given your consent to the Processing. Information regarding the Processing is always provided in connection to the request of consent.

**Performance of a contract** - The Processing is necessary for the performance of a contract entered between us and the Data Subject, or to prepare for entering into an agreement with the Data Subject.

**Legitimate interest** - StreamDNA may process Personal Data if we have assessed that a legitimate interest overrides the interest of fundamental rights and freedoms of the Data Subject, and if the Processing is necessary for the purpose in question.

### Processing

The main purpose of the Processing of Personal Data undertaken by us is to provide, carry out and improve our Services. There are several different reasons why we may need to collect, manage and save your data.

We mainly Process the following types of Personal Data:

- Contact details to be able to confirm your identity, to verify your personal and contact details and to be able to communicate with you
- Personal financial details to be able to carry out KYC and risk analysis when applicable
- Information on your usage of the service or product to improve our Services
- IP-address to perform customer analysis and for content on our site to be presented effectively to you and the device you use
- Usage patterns to be able to provide you with specific offers
- Payment information to be able to offer you payment options in order to use our Services (for example direct debit and other payment options)

### How do we collect your Personal Data?

We collect your Personal Data in a number of different ways. We mainly collect your Personal Data:

- By you providing your Personal Data to us
- Through third-party analysis technology such as cookies

Regarding the Public Data, this is done by obtaining publicly available information from social media such as but not limited to Facebook, Instagram or YouTube.

### YouTube Data

By utilising the YouTube API, we may collect Public Data that you upload to your YouTube channel. Public Data may include any information you choose to upload to YouTube such as your channel name, country of channel, channel description & business email address. For the avoidance of doubt, Public Data is limited only to publicly available information that you upload. If any Public Data that we collect is changed or removed on YouTube, it will be updated on our website and servers to reflect such a change. If you do not want your Personal Data to be made available to us from YouTube you must update your account settings on YouTube (for more information, please see YouTube's terms of service: <https://www.youtube.com/t/terms>).

Due to the vast quantity of Public Data that we collect from YouTube, it is impossible or would involve a disproportionate effort to provide information to every Data Subject regarding the collection and Processing of their Personal Data (in accordance with Article 14(5)(b) UK GDPR) otherwise than by way of this Policy.

### Processing of YouTube Data

Any Processing of Personal Data contained within Public Data is done in accordance with our legitimate interest, and we shall take appropriate measures to protect the Data Subject's rights and freedoms and legitimate interests. We may share Public Data for direct marketing purposes, which may be regarded as carried out for our legitimate interest (Recital 47 GDPR).

The main purpose for Processing any Public Data is to provide Services to our customers and users. This includes sharing Public Data contained within our database with our customers in return for payment.

## Your rights

You are the one in control of your Personal Data and we always strive to ensure that you can exercise your rights as efficiently and smoothly as possible.

**Access** - You always have the right to receive information about the Processing of data that concerns you. We only provide information if we have been able to verify that it is you that are requesting the information.

**Rectification** - If you think that any of your Personal Data that we process is incorrect, let us know and we will fix it!

**Erasure** - Do you want us to completely forget about you? You have the right to be forgotten and request the deletion of your Personal Data when the Processing is no longer necessary for the purpose for which it was collected. If we are required to retain your information under applicable law or a contract that we have entered with you, we will ensure that it is processed only for the specific purpose set forth in such applicable law or contract. We will thereafter erase the information as soon as possible.

**Objections** - Do you disagree with our assessment that a legitimate interest for Processing your Personal Data overrides your interest in protecting your privacy? Don't worry - in such case, we will review our legitimate interest assessment. Of course, we add your objection to the balance and make a new assessment to see if we can still justify our Processing of your Personal Data. If you object to direct marketing, we will immediately delete your personal information without making an assessment.

**Restriction** - You can also ask us to restrict our Processing of your Personal Data:

- Whilst we are Processing a request from you for any of your other rights;
- If, instead of requesting erasure, you want us to limit the Processing of Personal Data for a specific purpose. For example, if you do not want us to send advertising to you in the future, we still need to save your name in order to know that we should not contact you; or
- In cases where we no longer need the information in relation to the purpose for which it was collected, provided that you do not have an interest in retaining it to make a legal claim.

**Data portability** - We may provide you with the data that you have submitted to us or that we have received from you in connection with a contract that we have entered with you. You will receive your information in a commonly used and machine-readable format that you can transfer to another personal data manager.

**Withdraw consent** - If you have given consent to one or several specific Processing(s) of your Personal Data, you have the right to withdraw your consent at any time and thus ask us to terminate the Processing immediately. Please note that you can only withdraw your consent for future Processing of Personal Data and not for Processing that has already taken place.

If you wish to exercise any of the rights set out above, please email us at [support@streamdna.com](mailto:support@streamdna.com).

## Transfer of Personal Data

In order to run our business, we may need help from others who will process Personal Data and/or Public Data on our behalf, so-called Processors.

We always strive to process our Personal Data within the UK or the EU/EEA but we have data processors in the following countries outside the UK and EU/EEA:

- USA, where we transfer Personal Data on the basis of the EU Commission's standard contractual clauses for data transfer to non-EU/EEA countries.

We have entered into Data Processing Agreements (**DPA**) with all our Processors. The DPA sets out, among other things, how the Processor may process the Personal Data and what security measures are required for the Processing.

We may also need to disclose your personal information to certain designated authorities in order to fulfil obligations under applicable law or legally binding judgements.

## Our processors

StreamDNA does not sell your Personal Data, except where it is Public Data, to third parties and of course, we do not share your Personal Data with just anyone. However, in some cases, we may need to share your Personal

Data with selected third parties. If so, we make sure that the transfer happens in a secure way that protects your privacy. To follow are categories of recipients with whom we may share your data.

- Advertising agencies and suppliers of print and advertising.
- IT suppliers for cloud storage, server hosting, business systems and case/project management. In order to be able to carry out our assignments and Services, we store your Personal Data in our business systems (a system that administers our customers and contacts).
- Churn management solution supplier to improve conversion rates and automate churn reduction.
- Payment processing suppliers.

## Security measures

StreamDNA has taken technical and organisational measures to ensure that your Personal Data is processed securely and protected from loss, abuse and unauthorised access. Organisational measures are measures that are implemented in work methods and routines within our organisation. Technical measures are measures implemented through technical solutions. In case your Personal Data is shared with Processors, your Personal Data will be equally protected.

### Organisational security measures:

- Login and password management
- Action logging
- Confidentiality agreements with third-party contractors

### Technical security measures:

- Encryption
- Access control levels
- Secure networks
- Firewalls
- Data back-ups
- Two-step verification

## Cookies

StreamDNA uses cookies and similar tracking techniques, so we can give you the best user experience possible. For more information on how we use cookies, request from us our Cookie Policy.

## If we don't keep our promise

If you think that we are not Processing your Personal Data correctly, even after you have notified us of this, you are always entitled to submit your complaint to the Commissioner. You can contact the Commissioner on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/>.

More information about our obligations and your rights can be found at:

<https://www.gov.uk/government/publications/data-protection-rights-for-data-subjects/data-protection-rights-for-data-subjects>.

## Changes to this policy

We reserve the right to make changes to this Policy. In the event that the change affects our obligations or your rights, we will inform you about the changes in advance so that you are given the opportunity to take a position on the updated policy.

## Contact

Please contact us if you have questions about your rights or if you have any other questions about how we process your personal information: [support@streamdna.com](mailto:support@streamdna.com).