

# Privacy Policy

Version 1.0 – 2025.04.20

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# 1. Introduction

Welcome to **Social Dancing**, operated by **Webigo e.U.** ("we", "us", or "our"). We are committed to protecting your privacy and handling your personal data in an open and transparent manner.

This Privacy Policy explains how we collect, use, disclose, store, and protect your personal data when you visit our website, use our platform as a Visitor, register as a Dancer or Partner, or otherwise interact with us. It also outlines your rights under data protection law, particularly the General Data Protection Regulation (GDPR).

## 2. Data Controller

The data controller responsible for your personal data when you interact with the platform as a user is:

### **Webigo e.U.**

Zedlitzgasse 3/14

1010 Vienna, Austria

Email: [contact@socialdancing.events](mailto:contact@socialdancing.events)

For any questions or requests regarding your personal data, please contact us at this email address.

### **2.1. When We Are Controller vs. Processor**

We may process your data either as a controller or a processor, depending on the context. Webigo e.U. acts as a data controller when:

- Operate the platform and website
- Manage your Dancer or Partner account
- Process analytics, preferences, or support messages
- Send essential communications (e.g., security updates)
- Handle billing and subscription data (for paid accounts)

In these cases, we determine how and why your data is used. Webigo e.U. acts as a data processor when:

- A Partner publishes activities (e.g., events, courses, festivals)
- A Dancer joins a Partner's loyalty program
- A ticket is ordered via a Partner's listing
- A Partner collects attendee or buyer data using our tools

Here, the Partner is the data controller, and we process data on their behalf based on their instructions.

If you're interacting directly with a Partner (e.g., attending their event, joining their program, or submitting data through their forms), please refer to that Partner's own privacy policy for more information.

### **3. What Personal Data We Collect and Why**

We collect different types of personal data depending on how you interact with our platform.

#### **3.1. All Users (Visitors, Dancers, Partners):**

##### 3.1.1. Usage & Analytics Data

When you use our platform, we automatically collect technical information using analytics tools (PostHog). This may include IP address, browser type, device type, operating system, referring URLs, pages visited, time/date of visit, interactions with features, and user flow. Cloudflare (used by PostHog) may also process data like IP addresses for security purposes.

- Purpose: To analyze platform usage, understand user behavior, improve our services, diagnose technical issues, ensure security, and prevent fraud.
- Legal Basis: Legitimate Interests (improving and securing our platform). For non-essential analytics tracking via cookies, we rely on your Consent.

##### 3.1.2. Communication Data

If you email us directly, we collect your email address and any information you provide in your message.

- Purpose: To respond to your inquiries and provide support.
- Legal Basis: Legitimate Interests (responding to user communications); Contract Necessity (if related to providing services under our Terms).

##### 3.1.3. Consent Records

When you provide consent (for cookies, terms of service, etc.), we collect your IP address, timestamp, and specific consent action.

- Purpose: To maintain records of user consent as required by law and to demonstrate compliance with privacy regulations.
- Legal Basis: Legal Obligation (to comply with consent record-keeping requirements); Legitimate Interests (for establishing proof of consent).

## 3.2. Dancers

### 3.2.1. Account Information

Name (required), email address (for login/communication), birthday (for age verification/optional display), gender (optional), consent status for notifications.

- Purpose: To create and manage your account, verify age, provide access to the Dancer Portal, communicate essential service information.
- Legal Basis: Contract Necessity (to provide the registered service); Legal Obligation (age verification if applicable); Consent (for optional data fields and specific notifications).

### 3.2.2. Loyalty Program Data

Records of activities where points were collected, points earned, points redeemed.

- Purpose: To operate the loyalty program features as requested by Partners and utilized by you.
- Legal Basis: Contract Necessity (to provide the loyalty program service).

### 3.2.3. Usage Data

Saved filter settings for search pages.

- Purpose: To provide a personalized user experience.
- Legal Basis: Legitimate Interests (enhancing user experience).

### 3.2.4. Profile Visibility

Your profile information is not public but may be visible to Partners whose loyalty programs you join, specifically loyalty-program related information (see Section 5).

## 3.3. Partners

### 3.3.1. Profile Information

Organization name (required), logo, website/social media links (Instagram, Facebook), organization description, partner type (required), contact person name, phone number, email contact (required), applicable dance genres (required), location (required). Some of this information constitutes your public profile.

- Purpose: To create and manage your Partner account, enable platform features (ticketing, loyalty), display your public profile to Visitors and Dancers, facilitate communication.
- Legal Basis: Contract Necessity (to provide the registered service).

### 3.3.2. Billing Information

Information needed for invoicing fees (e.g., billing address, contact details, VAT ID if applicable).

- Purpose: To process payments and comply with financial regulations.
- Legal Basis: Contract Necessity (to fulfill subscription agreement); Legal Obligation (for invoicing and tax compliance).

### 3.3.3. Platform Usage Data

Details of activities created, loyalty program configurations, analytics on ticket sales managed via the platform (even if payment is external), communication records within the platform, saved filter settings.

- Purpose: To provide platform features, enable reporting for Partners, improve services, ensure compliance.
- Legal Basis: Contract Necessity; Legitimate Interests (service improvement).

### 3.3.4. Ticket Order Data

Information related to ticket orders processed using our software (e.g., buyer name, email, any custom fields required by the Partner – excluding payment card details).

- Purpose: To facilitate the Partner's ticket management process via the platform. This data is processed on behalf of the Partner.
- Legal Basis: Processed based on the Partner's instructions under Contract Necessity (providing the ticketing tool). Partners are responsible for establishing a legal basis for collecting this data from buyers and for responding to data rights requests related to it. If you have questions or requests regarding data collected through a Partner's event or loyalty program, please contact the Partner directly.

## **4. How We Use Your Personal Data**

Beyond the specific purposes listed above, we use your data generally to:

- Provide, operate, maintain, and improve the Social Dancing platform and services.
- Process your payments (Partners).
- Communicate with you about your account, service updates, security alerts, and changes to our Terms or Policies (essential service communications based on Contract Necessity or Legitimate Interest).
- Enable Partners to send marketing communications (push notifications, emails) to Dancers *only* where Dancers have explicitly consented via their profile settings.
- Personalize your experience (e.g., remembering filter settings).

- Monitor and analyze trends, usage, and activities to improve the platform (Legitimate Interest).
- Ensure the security and integrity of our platform (Legitimate Interest).
- Comply with applicable Austrian laws and regulations (Legal Obligation).
- We do **not** perform automated decision-making or profiling with legal or similarly significant effects.

## 5. Data Sharing and Disclosure

We do not sell your personal data. We only share it in the following circumstances.

### 5.1. Service Providers

We share data with third-party companies that perform services on our behalf.

#### 5.1.1. Analytics

PostHog (Provides analytics services. Processes data in EU).

#### 5.1.2. Email Delivery

HubSpot (Marketing/CRM platform for email communication, US-based, uses SCCs/BCRs), Mailtrap (Email service, US-based, uses SCCs), Brevo (Email service, EU-based).

#### 5.1.3. Payments

Stripe (Processes payments for us, US-based, uses SCCs/BCRs, processes regionally).

#### 5.1.4. Infrastructure

Digital Ocean (Provides hosting infrastructure. Offers EU data centers), ImageKit (Store and deliver uploaded images. EU-based storage).

#### 5.1.5. Security/CDN

Cloudflare (Used by PostHog, provides security services, US-based, uses SCCs / potentially certified under EU-US Data Privacy Framework). We require these providers to respect the security of your personal data and treat it according to the law. We only permit them to process your data for specified purposes and in accordance with our instructions.

#### 5.1.6. Address Lookup

Google LLC (Verifies/auto-completes addresses via Google Places API. Global processing, uses SCCs supplemented by DPF).

## **5.2. Between Users (Partners and Dancers)**

### 5.2.1. Partner Visibility

When a Dancer joins a Partner's loyalty program, the Partner can view loyalty-related information about that Dancer (e.g., name, points status, potentially attendance records derived from point allocation) via the platform to manage their program.

### 5.2.2. Dancer Visibility

Dancers only see Partner information that the Partner has made public in their profile.

## **5.3. Legal Requirements**

We may disclose your personal data if required by law, regulation, legal process (like a court order or subpoena), or governmental request, or if we believe disclosure is necessary to protect our rights, property, or safety, or that of our users or the public.

## **6. International Data Transfers**

Some of our third-party service providers are located outside the European Economic Area (EEA). When we transfer your personal data outside the EEA, we ensure a similar degree of protection is afforded to it by implementing appropriate safeguards, such as:

- Transferring data to countries deemed to provide an adequate level of protection by the European Commission.
- Using specific contracts approved by the European Commission known as Standard Contractual Clauses (SCCs).
- For transfers to the US, potentially relying on the EU-US Data Privacy Framework certification of the provider.

Please contact us if you want further information on the specific mechanism used when transferring your personal data out of the EEA.

## **7. Data Retention**

We retain your personal data only for as long as necessary to fulfill the purposes we collected it for, including satisfying any legal, accounting, or reporting requirements.

### **7.1. Account Data**

We generally keep your account information for as long as your account is active. After account closure or deletion request, we will delete or anonymize your data within a reasonable timeframe (e.g., 30-90 days), unless we need to retain it for longer to comply with legal obligations (e.g., invoice data for tax purposes, which must be kept for typically 7 years in Austria) or resolve disputes.

## 7.2. Usage Logs & Analytics Data

This data is typically kept in an identifiable form for a shorter period (e.g., 6-12 months) and then anonymized or deleted.

## 7.3. Partner-Collected Data

Data collected by Partners via the platform (e.g., ticket buyer info) is retained according to the Partner's instructions or policies, subject to our platform's technical capabilities and overall retention limits.

If you request deletion of your account, we will delete your personal data according to these principles, subject to any legal holds or overriding requirements.

## 8. Data Security

We implement appropriate technical and organizational security measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. These measures include:

- Encryption of data where appropriate (e.g., HTTPS for data in transit).
- Access controls to limit data access to authorized personnel on a need-to-know basis.
- Secure server infrastructure and network protections (firewalls).
- Regular review of our security practices. However, no internet transmission is completely secure, and we cannot guarantee absolute security.

## 9. Your Data Protection Rights

Under GDPR, you have the following rights regarding your personal data:

- **Right to Access:** Request a copy of the personal data we hold about you.
- **Right to Rectification:** Request correction of inaccurate or incomplete data.
- **Right to Erasure ('Right to be Forgotten'):** Request deletion of your personal data where there is no compelling reason for us to keep processing it.
- **Right to Restrict Processing:** Request suspension of processing under certain conditions.
- **Right to Data Portability:** Request transfer of your data to you or a third party in a machine-readable format (applies to data processed based on consent or contract).
- **Right to Object:** Object to processing based on our legitimate interests or for direct marketing.
- **Right to Withdraw Consent:** Withdraw your consent at any time where we rely on consent to process your data (e.g., for non-essential cookies or specific

marketing notifications). You can typically manage notification consents in your profile settings.

To exercise any of these rights, please contact us at [contact@socialdancing.events](mailto:contact@socialdancing.events). We will respond to your request within one month, subject to legal requirements. We may need to request specific information from you to help us confirm your identity.

You also have the right to lodge a complaint with the competent supervisory authority. In Austria, this is the:

**Österreichische Datenschutzbehörde**

Barichgasse 40-42

1030 Vienna

Website: [www.dsb.gv.at](http://www.dsb.gv.at)

## 10. Cookies and Similar Technologies

We use cookies and similar technologies on our website. Cookies are small text files placed on your device.

### 10.1. Essential Cookies

These are necessary for the website and platform to function correctly. They include:

- Used to manage user authentication sessions across the platform
  - `__Host-next-auth.csrf-token`
  - `__Secure-next-auth.callback-url`
  - `__Secure-next-auth.session-token`
  - `__Secure-pretix_csrf-token`
  - `__Secure-pretix_session`
- Used to manage cookie and language/locale preferences across the platform
  - `NEXT_LOCALE`
  - `pretix_language`
  - `cc_cookie`
- Used by Stripe in the ticketing system to prevent fraud
  - `__stripe_mid`

### 10.2. Analytics Cookies

These help us understand how users interact with our platform.

- Used by PostHog for usage analytics

- `ph_phc_[id]_posthog`

### **10.3. Third-Party Cookies**

- Set by Cloudflare (used via PostHog) for bot management/security.
  - `__cf_bm`

### **10.4. Consent for Non-Essential Cookies**

We ask for your consent before placing non-essential cookies (like Analytics cookies) via a cookie banner when you first visit our site. Our cookie banner allows you to manage your preferences per category (e.g., analytics, marketing). No non-essential cookies are placed without your explicit opt-in.

You can manage your preferences and withdraw consent at any time via the cookie settings link, usually found in the website footer. Declining non-essential cookies may impact your user experience but will not prevent you from using the core services.

## **11. Children's Data**

Our platform is not intended for individuals under the age of 18. We do not knowingly collect personal data from children under 18. If we become aware that we have inadvertently collected such data, we will take steps to delete it immediately and terminate the associated account.

## **12. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time. If we make material changes, we will notify you through the platform or via email (if you have provided one) before the changes take effect, consistent with our Terms and Conditions. We encourage you to review this Policy periodically.