

**WINBIX OÜ.** (“WINBIX”, “we”, “our”)

Registered office at: Peterburi tee 47, Lasnamae linnaosa, Tallinn, Harju maakond, Estonia, 11415.

E-Mail: support@winbix.com

## **Privacy Policy**

Effective Date: 01.03.2019

Your privacy is important to us, and we take our responsibility of caring for it seriously. This policy describes what information WINBIX collects when you use online and downloadable products and services (“products”) offered by WINBIX. By using our products, you consent to this policy.

For the purpose of the present Privacy Policy “personal data” or “personal information” shall mean information that can be used to directly or indirectly identify and individual collected through use of WINBIX’s website, online services and platform.

Any information stored on WINBIX’s platform is treated as confidential. All information is stored securely and is accessed by authorized personnel only. WINBIX implements and maintains appropriate technical, security and organizational measures to protect personal information against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

From March 1, 2018 the EU Directive 95/46/EC of the European Parliament and the Council of 24 October 1995 (the “Directive”) and local legislation based on the Directive will be replaced by the Regulations (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such personal data, known as the General Data Protection Regulation (GDPR), and WINBIX’s processing will take place in accordance with the GDPR.

### **1. Information WINBIX collects**

WINBIX collects personal information from you on a voluntary basis. When you submit personal information to WINBIX it usually take the form of Website registration for the purpose of use by you of WINBIX’s products and services. The types of information collected by WINBIX may vary depending on the activity.

At registration WINBIX collects your personal information such as:

- an e-mail address
- an Internet Protocol (IP) address
- a cookie ID

In case of use by you of WINBIX’s payment products and services WINBIX may additionally collect from you the following information:

- address of your electronic wallet (ERC20)

From time to time WINBIX may collect information about you from third parties (Facebook, Google):

- name and surname
- an e-mail address
- telephone/cell number

When you participate in social feature (such as chat) the information that you disclose is public information. WINBIX may store and access it, and it may be read, copied, collected or used by other users without your consent. Please, make sure your privacy settings reflect your preferences.

## **2. Why WINBIX collects information about you**

To provide WINBIX's products and online services to you.

As applicable, WINBIX will use information about you for delivering WINBIX's products and online services to you, as well as:

- responding to your enquiries; and
- contacting you about matters requiring your attention.

This processing of information and analytics is necessary for WINBIX to pursue our legitimate interests of making our products and online services available to you, and ensuring that our products and online services function properly so that you have the best experience when acquiring any one of our products and using the online service.

### **To understand how users use WINBIX's online service**

WINBIX processes information about you to understand how users use WINBIX's products and online services, and to compile analytics and statistical reports regarding that activity.

This processing is necessary for WINBIX to pursue its legitimate interests of (i) ensuring that WINBIX's products and online services function properly so that you and other users have the best experience when acquiring WINBIX's products and using the online services, and (ii) improving the quality of WINBIX's products and online services, and providing a better experience to WINBIX's users.

## **Marketing**

WINBIX uses various forms of marketing to provide you with promotional materials about WINBIX's products and online services. WINBIX will not process your information for the purposes of marketing or pass your information on to third parties for the purposes of such marketing unless you give your consent or you have given it already.

**Direct Marketing:** WINBIX send you marketing e-mails about products and/or services which are similar to WINBIX's products and/or online services, but WINBIX shall not do this without your express consent.

**Targeted Marketing:** WINBIX may use the information it collects about you to serve you targeted advertisements via WINBIX's products and/or online services. WINBIX does this to provide you with more relevant advertising content.

We work with the following third party providers to provide you with such targeted content:

- Facebook
- Telegram
- Google

The processing of your information in this way is necessary for WINBIX to pursue its legitimate interests of ensuring that WINBIX's products and online services remain accessible for all its users.

## **3. Data sharing**

WINBIX will share your information with third parties only in the ways that are described in this Privacy Policy, including the third parties analytics and marketing providers detailed herein.

WINBIX keeps your information confidential, but may disclose it to its personnel, suppliers or subcontractors insofar as it is necessary for the purposes set out in this Privacy Policy. However, this is on the basis that they do not make independent use of the information, and have agreed to safeguard this information.

In addition WINBIX may disclose your information to the extent that WINBIX is required to do so by law (which may include to government bodies and law enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and in order to establish, exercise or defend WINBIX's legal rights (including providing information to others for the purposes of fraud prevention).

If WINBIX involved in a merger, acquisition or sale of all or a portion of its assets, you will be notified via e-mail, account message and/or a prominent notice on WINBIX's website of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

WINBIX may also disclose your personal information to third parties in order to enforce or apply the terms of agreements between WINBIX and you, to investigate potential breaches or to protect the rights, property or safety of WINBIX, its customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

#### **4. Cookies**

Cookies are small pieces of information sent by a website to your hard disc. Cookies cannot be used to run programs or deliver viruses to your computer. By continuing to visit WINBIX's website, you agree to the placement of cookies on your device. If you choose not to accept our cookies, we cannot guarantee that your experience will be as fulfilling as it would otherwise be. We may also place cookies from third parties for functional and marketing purposes. The use of cookies is widespread and benefits you. For further information see our Cookie Policy.

#### **5. Consumer control and opt-out options**

If you do not wish to receive promotional or other marketing material from WINBIX or third parties then you can opt-out by changing your account settings in the online service at any time. Alternatively you can contact WINBIX via Support Service and let WINBIX know that you no longer wish to receive promotional or other marketing material from WINBIX or third parties.

#### **6. Your rights in relation to personal data which WINBIX processes relating to you**

You have the following rights over the way WINBIX processes personal data relating to you, as set out below. We aim to comply without undue delay and within one month at the latest. To make a request, please let WINBIX know via your personal account or the Service Support.

##### **Ask for a copy of data WINBIX is processing about you and have inaccuracies corrected**

You have the right to request a copy of the personal information WINBIX holds about you and to have inaccuracies corrected. WINBIX will use reasonable efforts to the extent required by law to supply, correct or delete personal information held about you on our files (and with any third parties to whom it has been disclosed to).

##### **Object to WINBIX processing data about you**

You can ask WINBIX to restrict, stop processing or to delete your personal information if:

- you consented to our processing the personal information and have withdrawn that consent;
- WINBIX no longer needs to process that personal information for the reason it was collected;
- WINBIX is processing that personal information because it is in the public interest or it is in order to pursue a legitimate interest of WINBIX, you don't

agree with that processing and there is no overriding legitimate interest for WINBIX to continue processing it;

- The personal information was unlawfully processed;
- you need the personal information to be deleted in order to comply with a legal obligations;
- the personal information is processed in relation to the offer of a service to a child.

### **Obtain a machine readable copy of your personal information which you can use with another service provider**

- if WINBIX is processing data in order to perform its obligations to you or because you consented, if that processing is carried out by automated means, WINBIX will help you to move, copy or transfer your personal information to other IT systems;
- if you request, WINBIX will supply you with the relevant personal information in SCV, XML, JSON formats. Where it is technically feasible you can ask WINBIX to send this information directly to another IT system provider if you prefer.

### **Make a complaint to a Supervisory Authority**

- if you are unhappy with the way WINBIX is processing your personal information, please let us know by contacting us via the Support Services;
- if you do not agree with the way WINBIX has processed your personal information or responded to your concerns, an alternative is to submit a complaint to a Data Protection Supervisory Authority.

## **7. Data retention**

WINBIX will hold your personal information on our systems as long as is necessary for the relevant service, or as otherwise described in this Privacy Policy. WINBIX considers that 36 months from the date of your last login an appropriate period of time to retain this data and after this date WINBIX will delete your detail.

## **8. Children**

WINBIX does not use its Website, products and/or online service to knowingly solicit data from or market to children under the age of 16. If a parent or guardian becomes aware that his/her child has provided us with personal information without their consent, he/she should contact WINBIX via the Support Services. WINBIX will delete such personal information from its files within a reasonable time.

## **9. Security and storage**

WINBIX will take all reasonable technical and organizational precautions to prevent the loss, misuse or alteration of your personal information. All WINBIX's databases are password protected and encrypted using Transport Layer Security (TLS) and Secure Sockets Layer (SSL).

Please be aware that although WINBIX endeavor to provide reasonable security for personal information it processes and maintains, no security system can prevent all potential security breaches.

All personal information collected and processed by WINBIX will be stored exclusively in secure hosting facilities within the EEA.

WINBIX may transfer personal information only to countries with guaranteed adequate level of protection as defined by the GDPR.

## **10. Acceptance of this Privacy Policy**

WINBIX assumes that you have carefully read this Privacy Policy and agree to its contents. If someone does not agree with this Privacy Policy they should refrain from using WINBIX's website, products and online services and platform.

WINBIX may update this Privacy Policy from time to time, so please review it frequently. WINBIX will notify you of material changes via a notice within WINBIX's website, products and online services and platform. Your continued use of WINBIX's website, products and online services and platform shall mean you accept the changes. Once you accept this Privacy Policy, WINBIX will not enforce future changes it deems in good faith to be material absent your express agreement to the changed Privacy Policy. If you are asked to affirmatively accept material changes to this Privacy Policy and you decline to do so, you may not be able to continue to use WINBIX's website, products and online services and platform.

## **11. WINBIX's legal obligation to disclose personal information**

WINBIX will reveal a user's personal information without his/her prior permission only when WINBIX has reason to believe that the disclosure of this personal information is required to establish the identity of, to contact or to initiate legal proceedings against a person or persons who are suspected of infringing rights or property belonging to WINBIX or to others who could be harmed by the user's activities or of persons who could (deliberately or otherwise) transgress upon these rights and property. WINBIX is permitted to disclose personal information when it has good reason to believe that this is legally required.

## **12. Contact WINBIX**

If you have a complaint or question about WINBIX, this Privacy Policy, you may contact Support Service at [support@winbix.com](mailto:support@winbix.com), or in writing at: Peterburi tee 47, Lasnamae linnaosa, Tallinn, Harju maakond, Estonia, 11415.







