

## Privacy Notice

### 1. Introduction

1.1 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.

### 2. Who are we

2.1 This website is owned and operated by Data controller and holder is KIBIS GROUP LTD are registered in **20-22 WENLOCK ROAD, LONDON, ENGLAND, N1 7GU**

2.4 You can contact us using our website chat contact form.

### 3. How we use your personal data

3.1 In this Section 3 we have set out:

- (a) the general categories of personal data that we may process;
- (b) the purposes for which we may process personal data; and
- (c) the legal bases of the processing.

3.2 We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system and Geo IP table. This usage data may be processed for the purposes of analyzing the use of the website and services.

3.3 We may process your account data ("account data"). The account data may include your name and email address. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.

3.4 We may process your information included in your personal profile on our website ("profile data"). The profile data may include your name, address, telephone number, email address, profile pictures, gender and date of birth. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services.

3.5 We may process your personal data that are provided in the course of the use of our services ("service data"). The service data may include your IP logs, activity logs and preferences that you set in the script settings. The source of the service data is you. The

service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.

3.6 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("transaction data"). The transaction data may include your contact details, your account name and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions.

3.7 Please do not supply any other person's personal data to us, unless we prompt you to do so.

#### 4. Providing your personal data to others

4.1 Financial transactions relating to our website and services are handled by our payment services providers. We will share transaction data with our payment services providers only to the extent necessary for the purposes of [processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds]. You can find information about the payment services providers' privacy policies and practices at kib.is websites.

4.2 We may disclose your personal data (age, gender and country) to our CPA/GPT Affiliate Network third party suppliers for the purpose of showing you relevant offers and services. Each such third party will act as a data controller in relation to the enquiry data that we supply to it.

#### 5. International transfers of your personal data

5.1 Your personal data, unless this is required for payment processing or token distribution will not be transferred by us to other countries outside the European Economic Area (EEA).

5.2 You acknowledge that [personal data that you submit for publication through our website or services] may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

#### 6. Retaining and deleting personal data

6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 We will retain your personal data as follows:

(a) usage data will be retained for a maximum period of 90 days following the data collection;

(b) account data, profile data, service data and transaction data will be retained for a maximum period of 24 hours following your account removal.

6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 7. Amendments

7.1 We may update this policy from time to time by publishing a new version on our website.

7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

7.3 We will notify you of significant changes to this policy by email.

## 8. Your rights

8.1 In this Section 8, we have summarized the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

8.2 Your principal rights under data protection law are:

(a) the right to access;

(b) the right to rectification;

(c) the right to erasure;

(d) the right to restrict processing;

(e) the right to object to processing;

(f) the right to data portability;

(g) the right to complain to a supervisory authority; and

(h) the right to withdraw consent.

8.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data.

8.4 You have the right to have any inaccurate personal data about you rectified and, considering the purposes of the processing, to have any incomplete personal data about you completed.

8.5 You have the right to the erasure of your personal data without undue delay. This may happen if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing or personal data have been unlawfully processed. If you want to erase your personal data, make an inquiry to our official email address.

8.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection.

8.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party.

8.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

8.9 To the extent that the legal basis for our processing of your personal data is:

(a) consent; or

(b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format.

8.10 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

8.11 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

## 9. About cookies

9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

9.2 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

9.3 If you block cookies, you will not be able to use all the features on our website.

## 10. Cookies that we use

10.1 We use cookies for the following purposes:

- (a) authentication - we use cookies to identify you when you visit our website and as you navigate our website.
- (b) status - we use cookies to help us to determine if you are logged into our website.
- (c) personalization - we use cookies to store information about your preferences and to personalize the website for you.
- (d) security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally.
- (e) (e) analysis - we use cookies to help us to analyse the use and performance of our website and services.

## 11. Cookies used by our service providers

11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

11.2 We may use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website.