

## **PRIVACY POLICY**

**(Last Updated: October 27, 2020)**

We are **Limited Liability Company “Boosteroid Games S.R.L.”**. This Privacy Policy (the “Policy”) explains what data we collect from you when you use the [Website](#) why we collect it, and how you can access, manage, export and delete your data.

This Policy is based on and our legal relationships with you are governed by the General Data Protection Regulation (“[GDPR](#)”) and other applicable data protection laws. If you do not agree to our use of your data, please cease using our products, services, and properties.

**If any provision of this Policy is unclear for you or you need explanation or clarification, make sure you contact us at [partners@boosteroid.com](mailto:partners@boosteroid.com) before you start using the [Website](#).**

### **1. Who We Are and What this Policy Governs**

**The data controller of your Personal Data is Limited Liability Company “Boosteroid Games S.R.L.”**, duly incorporated under the laws of Romania, located at România, Bucharest, Sector 1, Avionului str. 26, office B, Romania, registration number: 31715471.

This Policy applies to <https://boosteroid.partners/> website (the “Website”), its functionality, videos, texts, other content you use, get, access via the Website. The Policy applies to Personal Data and other information we collect from you when you access and/or use the Website.

### **2. What is Personal Data**

We receive/store any information you enter on the Website or give us in any other way, as well as collect information from you. Some of this information is Personal Data, as defined in GDPR.

‘Personal data’ means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to a name, an id, location, online identifier or to one or more factors specific to physical, physiological, genetic, mental, economic, cultural, social identity of that person. **Personal Data is the information that can be used to identify you personally.**

### **3. Our Data Protection Principles**

We comply with data protection laws, which state that personal data shall be:

- used lawfully, fairly and in a transparent way, applying the data minimization principle;
- collected for valid purposes that we clearly explain to you and not used for other purposes;
- relevant to the purposes we reveal to you and limited only to those purposes;
- accurate and kept up to date, kept as long as necessary for the purposes we reveal to you;
- kept securely, on a hashed/anonymized basis wherever possible.

### **4. Protecting Children and Vulnerable Persons**

The Website is designed to be used by adults only (those who are at least 18 or have reached other legal age in their jurisdiction). We will never knowingly collect Personal Data from any person under 18. If you are a parent or guardian and are concerned about the use of Personal Data of your child, contact us at [partners@boosteroid.com](mailto:partners@boosteroid.com).

If you are a parent or guardian and are concerned about the use of Personal Data of a partially incapacitated person or any other person who regardless of their age and for whatever reason exercise all or part of their rights through a parent or guardian, contact us at [partners@boosteroid.com](mailto:partners@boosteroid.com).

## 5. Why Do We Collect Your Personal Data?

We collect Personal Data and other information to provide the services for you as our client. Your Personal Data processing is necessary to perform our services to you as requested by you when you choose to use the Website, and to maintain the proper operation of the Website and its functionality (a “legitimate interest” under GDPR), or where you explicitly consent to such collection. You may withdraw your consent at any time.

Here’s why we collect your Personal Data and other information:

- to ensure network and information security (prevent breaches, attacks, thefts, fraud, spam);
- to ensure that content is presented in the most effective manner for you and your device;
- to share information about the Website, other services and products that we provide;
- to notify you about changes and updates to the Website;
- to conduct statistical analysis necessary to evaluate and improve the Website;
- to develop and improve our Website, fix bugs and errors, introduce updates;
- to send confirmations for sign up and confirmation of other actions you make on the Website;
- to respond to your questions, assist you with issues you experience while using the Website.

Check the next Section 6, where we explain what data we collect, mention collection cases and purposes.

## 6. WHAT DATA WE COLLECT

We will collect the following Personal Data and other information from you if you choose to use the Website:

- Your email.

We need your email to provide you with your user account. Your email should be active and valid. We use your email to send you a confirmation to sign up, restore your password, other confirmations. We use it to communicate with you, provide support, reply to your inquiries and requests, inform you about updates of the Website. We can also contact you by email for marketing (including direct marketing) and advertising, ask you to evaluate the Website/provide feedback, send you the content related to the Website, our company, business or the industry. You can easily unsubscribe from receiving emails at any time by clicking the “Unsubscribe” button available in our emails or by contacting us at [partners@boosteroid.com](mailto:partners@boosteroid.com).

- Your account name.

We will ask you to make up an account name which will be your user name. You don’t have to use your real name as a username. If you choose an abusive username we can ask you to change it or we can deactivate your account without prior notice. If that’s the case we won’t be responsible for any loss or damage to you. You can skip providing this information and still be able to generate referral links and use other Website functionality, but you will need to fill in this information to get a payout.

- Your account password.

It is stored encrypted in our database, we do not know it. The information available in your account is protected by your password. We require you to set at least 8-characters’ password. You should keep your password safe. If you fail to keep your password secure, we won’t be liable for any loss or damage to you.

- Your phone number.

Your phone number will be securely stored on our servers as long as your user account exists. We may contact you by phone (call you or send you SMS) to ask you about your experience of using the Website or for marketing and advertising. If you don't want us to contact you by phone, you can tell us about that directly when we call you or send an email to [partners@boosteroid.com](mailto:partners@boosteroid.com) informing us that you don't want us to contact you by phone. You can skip providing this information and still be able to generate referral links and use other Website functionality, but you will need to fill in this information to get a payout.

If you choose to communicate with us via phone (if you give us a call) we will collect the phone number you use to contact us to be able to communicate with you. We will store that number as long as it's necessary for us to be able to contact you by phone (until the issue we are discussing with you is resolved). We DO NOT collect other contact details, like your physical or registered address.

- Your date of birth.

We will use this information to know whether your age allows you to use the Website. You should be at least 18 or reach the legal age in your jurisdiction to use the Website. We will also use your year of birth to evaluate the age group of our clients for marketing and business development purposes. The information will be securely stored on our servers together with other information related to you as a user. We will not share this information with any third party. You can skip providing this information and still be able to generate referral links and use other Website functionality, but you will need to fill in this information to get a payout.

- Your real name.

We need this information for our managers to be able to contact you or reply to your requests. You can skip providing this information and still be able to generate referral links and use other Website functionality, but you will need to fill in this information to get a payout.

- Email address associated with your PayPal account.

In order to do payouts upon your request we need to know your PayPal email address. With this information we'll be able to send money you receive as a reward to you using PayPal. You can skip providing this information and still be able to generate referral links and use other Website functionality, but you will need to fill in this information to get a payout. Please check [PayPal Privacy Statement](#) for more information on how PayPal uses Personal Data.

- Your IP-address.

Your Internet Protocol address is a numerical label assigned to your device when it is connected to the Internet. We get this information automatically when you interact with our website, services or other software available online. We either collect your IP-address by ourselves, or it is provided to us by your browser.

- Your location.

We will collect data related to the location (country and city) from where you access our Website to evaluate the geography of our Website, design business development and scaling plans, improve our functionality, add new language profiles, evaluate the performance of our software, hardware and network in a particular area, fix technical issues you and other users in your area users may face while using the Website. These data are securely stored in our database on a completely anonymised basis, we don't share these data with any third party.

We can also ask you about your location in our communication with you, if you address our support with a problem or a question and we will need to know what country (and/or city) you are based in to answer your question or fix your problem.

- Technical data about the device you use to access the Website.

This includes your Internet and/or network connection (Internet speed, IP address); mobile device identifiers; operating system, browser type; your hardware details; technical details provided by your browser.

We will process this data to ensure that our Website interacts with your device in the most efficient way. This data will help us collect statistics about the devices our users use so that we can improve the Website and make it even more user-friendly. We also need it in case of an error or issue, so that we can understand what kind of device or software experienced a problem and what we can do about that.

- Details of your use of the Website.

This includes metrics data about when and how you use the Website; web traffic; purchase history; your preferences and choices like subscription type, preferred language or currency.

For e.g., we collect and analyze data about your visits to our website to optimize design and functionality.

- Bug and error reports, crash logs.

Our software automatically generates bug/crash reports to get information about software or hardware problems that may occur while you use the Website. This data will include your device type, operating system and browser type, network connection and how our software interacts with your device. We will use such data to fix problems on the Website. We need it to identify the type of error or bug, where and why it occurred and how we can fix it. We also use such data to provide you with tech support.

We may integrate third-party software to generate, collect, and manage bug reports/crash logs. Such third-party software will not receive any of your data, accept bug and crash-related data mentioned above. It will deal only with the software issues that occur while you use the Website. We'll always maintain the necessary level of data security when using third-party software.

- Data collected using cookies.

We collect Personal Data and other information from you by using cookies and other tracking technologies. Our use of these technologies is described in the Cookie Policy that you should check before using the Website. If you don't agree to our use of cookies, cease using the Website.

- Your communication.

We receive your communication with us via email and support chat, your messages and comments in internal blogs/forums. We also have access to your in-game chats to provide you with the opportunity to use them while you play games through the Website.

We may intercept, record and/or monitor any communication (including phone calls or other electronic communication) between you and us. We can do so to resolve queries in the future, for the purposes of security, staff training, complying with our legal responsibilities.

**Please note that:**

- We will NEVER ask you to send us any of your personal documents (passport, other ID, social security number, taxpayer number, birth/marriage certificate, driving license, health insurance, etc.). If somebody asks you to provide these documents on behalf of us, never do that and contact us at [partners@boosteroid.com](mailto:partners@boosteroid.com) as soon as possible.
- If we need any other data not specified here, we will ask you to provide such data, explain why we need it and what we will do with it. We will ask for your consent or explain other legitimate grounds of our collection and use of such data.
- Even if you only access our website and do not create the account, we will automatically gather information from your computer such as your IP address, browser type, referring/exit pages, and operating system.

### **7. Sensitive Personal Data and information.**

Never send us, and never disclose or make available any sensitive Personal Data and information including social security numbers, ethnic origin, religious or philosophical beliefs, political opinions, sex life and orientation, trade union membership, health-related information, biological characteristics, genetic data, biometrics, social background, family, criminal history, and/or any other information that you personally consider sensitive, as well as any other information that can be reasonably considered as sensitive.

If you disclose any sensitive Personal Data/information when uploading/posting user content to the Website, you are responsible for the consequences of such disclosure. This data will be collected by us and stored on our servers (as any user content you upload/post) and its processing will be considered as processing that relates to personal data which are manifestly made public by the data subject (you). We won't process such data for profiling, marketing, etc. We will share it with competent authorities if we are requested.

### **8. Social Network Accounts**

You may log into the Website using social network accounts, such as Google, Facebook, etc. These services will authenticate your identity and provide you with the option to share certain Personal Data with us such as your username, first name, last name, email address. On Facebook, you may use the dev console to manually manage the information that Facebook will provide to us when you log into the Website. On Google you may manually manage the information Google will provide to us in the settings of your Google Account. Anyway, whichever information Google will provide us when you log in using Google, we will collect only your email. We do not need and will not use other information, like the first and last name specified on your Google Account.

### **9. Third-party websites and platforms**

The Website may contain links to and from the websites or services of third parties. This Policy does not apply to external websites, companies or providers, so please check their privacy notices.

### **10. Use of Your Personal Data**

We will strive to collect only the data required for the purposes mentioned in this Policy (data minimization principle) and store it until it serves the purpose of its collection. If you think we do not comply with the data minimization principle, please contact us and report your concern.

We use the Personal Data and other information that we collect for the following purposes:

- to comply with our legal or regulatory obligations, transaction recording, other compliance responsibilities, reporting to regulators and competent authorities when applicable;
- to ensure the security of our network and software infrastructure;
- to conduct know your client and anti-money laundering checks on you, and associated financial crime and fraud monitoring if requested by competent authorities or required by law;
- to carry out our obligations under our contracts with you or others;
- to protect you from unauthorized use of your account;

We have a legitimate interest in ensuring that the Website operates effectively, and to do this we may use your Personal Data:

- to monitor, improve and administer the Website;
- to contact you to ensure customer satisfaction with respect to our role as a platform and service provider and assist you in getting the best value from our services;
- to respond to customer support or other inquiries requesting information.

We also have an interest in communicating with you and others, publicizing our business, and making sure that our marketing, advertising, and content is effective, so we will use your Personal Data and other information we collect from you:

- for direct marketing (you have the right to object to direct marketing at any time for free);
- to conduct surveys, analysis;
- to evaluate the popularity and performance of the Website;
- to advertise, publicize, promote the Website and our business, and to measure, understand, or improve the effectiveness of advertising we provide to you and others;
- to create and share informative content about our business or the industry in which we operate;
- to provide you with news, updates about the Website, our business and industry;
- in certain circumstances, we may seek your consent to use your Personal Data for any specific purpose. We will ask you to confirm a separate consent to your Personal Data being processed for a specific purpose, either through the Website or by other means.

We can create anonymous data records from Personal Data by excluding information that can identify you personally. Such anonymous data derives from personal data rendered anonymous in such a manner that the data subject (you) is not or no longer identifiable. So, it will be impossible for anyone to use such anonymous data to identify you personally. We will use such anonymous data to analyze request and usage patterns so that we can enhance the content, improve the Website and its navigation. We may use such anonymous data for any purpose and disclose it to third parties.

## **11. Storage and Transfer of your Personal Data, Security**

Your Personal Data and other information related to you and your account will be stored as long as you have your account. When your account is deleted, all your data will be deleted too. Erasure of your data and stop of its processing upon your request may lead to the inability to use the Website. We will carefully explain to you all the consequences of the erasure or stop of the processing in each particular case. We will retain technical information related to your account and your use of the Website after your account is deleted, provided that such information contains no Personal Data.

The Personal Data collected by us will be normally used by us. We share the Personal Data with our affiliates and trusted partners within our corporate family, third parties with which we have partnered to allow you to integrate their services into the Website, and with trusted third-party service providers as necessary for them to perform services on our behalf. We only share your Personal Data when necessary for any third party to provide the services as requested or needed

on our behalf. These third parties are subject to all applicable data processing terms and are prohibited from utilizing, sharing or retaining your Personal Data for any purpose other than as they are specifically contracted for or without your consent.

The data we collect from you may be transferred to and stored on our servers located outside your country of residence, the EU, or the [European Economic Area](#) ("EEA") and Switzerland. It may also be processed by staff operating outside the EEA and working for us or one of our suppliers. Such staff may be engaged in the processing of your data, maintaining servers where it is stored, and customer support. Any potential transfer of Personal Data outside the EEA will be done in accordance with GDPR. **By consenting to this Policy, you agree to this transfer, storing or processing.** We will take all steps necessary to ensure that your data is treated securely and in accordance with this Policy and GDPR. We will ensure that your rights will remain enforceable and effective legal remedies will be available to you following the transfer.

We endeavor to take all reasonable steps to protect your data. We also require that our employees and agents undergo mandatory data protection training. However, we cannot guarantee the security of any data you disclose online. In using the Website, you agree that you will not hold us responsible for any breach of security unless we fail to fulfill our obligations.

## **12. Transfer of Personal Data and Other Information outside the EEA**

What is the EEA? The EEA means [European Economic Area](#). The EEA includes all EU member states and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland). The UK will remain a part of EEA until December 31, 2020.

Way may transfer your Personal Data and other information we collect from you outside the EEA. **By consenting to this Policy, you agree to this transfer.**

The GDPR, other relevant EU laws, rules and regulations, as well as rules and procedures set forth in this Policy will always apply to your Personal Data and other information we collect from you regardless of where your data is transferred.

Your Personal Data and other information may be transferred outside the EEA only to our representatives and agents who provide services to us on to you on our behalf. Such representatives and agents will receive only the data necessary for the provision of their services. These services always constitute a part of the services you get when using the Website. These services include technical support and maintenance and customer support.

The GDPR, other relevant EU laws, as well as rules and procedures set forth in this Policy are binding to all our representatives and agents who may access your Personal Data and other information.

All enforceable rights and effective legal remedies remain fully available for you with regard to the transfer of your Personal Data and other information outside the EEA.

## **13. Corporate Restructuring, M&A**

If any other company acquires our company, business, assets, this company will possess your Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Policy.

#### 14. Your Data Protection and Privacy Rights

You have the right to **access your data** which means you can see what data we have collected whenever you want.

You can **request a copy** of all your personal and other data we hold. We will provide such a copy for free but we will charge a reasonable fee if you ask for more than one copy of the same data. In that copy, we'll also explain how and why we use your data. You have the right to **data portability** that assumes your data can be easily transferred to another organization.

You can request **rectification or erasure** of Personal Data. We will rectify or delete your data free of charge upon your request unless keeping your data is required for our legal and regulatory compliance. Even if you don't ask us to delete your data, we will stop keeping it if we no longer need it for the purposes described in this Policy.

You can **object to our processing** of your data. We will stop processing it upon your request unless the processing is required for legal and regulatory compliance. We will carefully explain to you the consequences you might face after we stop processing your data upon your request in each particular case.

You can **object to direct marketing or other kinds of communication** we send to you at any time free of charge. Simply click "Unsubscribe" or similar button where applicable, or contact us at [partners@boosteroid.com](mailto:partners@boosteroid.com).

Where you have provided your consent to the processing of your data, you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we did prior to your withdrawal and will not affect the processing of your information conducted on lawful grounds other than consent.

You have the right to **contact the appropriate authority** to protect your privacy. We kindly ask you to contact us first, if you have any concerns about how we use your data, so we can try to resolve the issue. However, you can always report a complaint. To do that, contact [The National Supervisory Authority for Personal Data Processing](#) in Romania: +40318059211, [anspdcp@dataprotection.ro](mailto:anspdcp@dataprotection.ro), or a data protection authority in your region.

You can stop all collection of your data by our mobile app or our web/desktop software by uninstalling the app or such software at any time. Use standard uninstall processes available in your mobile device, PC or another device, the mobile app store or network.

If we need or are required to confirm your identity to provide you with the opportunity to exercise your rights, we'll request additional information from you to confirm your identity.

GDPR and other applicable data protection laws may provide you with **other rights** we have not explicitly covered in this Policy.

To send a request for a copy of your data, to tell us to delete/rectify your data, to withdraw the consent, and to exercise any other rights, please contact us at [partners@boosteroid.com](mailto:partners@boosteroid.com).

#### 15. Changes to the Policy

We update this Policy from time to time, so we encourage you to review it frequently. We won't notify you about the changes unless they are significant. "Last Updated" legend above indicates



when the Policy was last changed. The changes will become effective after they are posted on our [website](#). If you do not agree to the changes, please cease using the Website.

#### **16. Contact Information**

If you have any questions about the Website, the Policy, our use of your personal data and other information, or should you require any clarifications or assistance, please contact us at [partners@boosteroid.com](mailto:partners@boosteroid.com).

#### **Boosteroid Games, S.R.L.**

România, Bucharest, Sector 1, Avionului str. 26, office B.

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