

## PRIVACY POLICY

*Updated: 19 of May 2020*

We respect the privacy of people who visit <https://oton.technology> (“**Website**”). We are devoted to the protection of your personal data. In particular, we are committed to processing your personal data responsibly in compliance with applicable data protection laws and only for defined below purposes.

This Privacy Policy is a legally binding agreement between you and incorporated as a legal entity **OTON Technology Limited**, registered under the laws of Seychelles, registered number 182391, registered office Suite 3, 1st Floor, La Ciotat Building, Mont Fleuri, Mahe, Seychelles (the “**Company**”). The Privacy Policy applies to any processing activities by the COMPANY resulting from your use of the Services, as defined in our Terms and Conditions. The processing activities shall cover the use, collection, retention, storage, security, disclosure, transfer, disposal, and any other processing of personal data, defined by the applicable laws.

Before you give us your consent on the collection and processing of your personal data, or provide us with your personal data, we kindly ask you to read carefully this Privacy Policy. It explains when, where, and why we collect personal data of our users, how we use such data, the conditions under which we may disclose it to others, your rights in respect of your personal data, and how we keep it secure.

With this Privacy Policy, we tried to provide you with clear, plain and complete explanation of privacy matters within the COMPANY. We hope you will have no doubts that your data is safe with us. In case you have any questions about your privacy, - do not hesitate to write us. We will be happy to provide you with needed assistance.

Occasionally, at our sole discretion, we may change this Privacy Policy, so we will kindly ask you to regularly check this page to ensure that you are aware of any changes. We will be posting such changes on this page and update the Privacy Policy modification date at the top of this page. In case of significant changes to this Privacy Policy, we would inform you separately of the relevant changes.

For more details regarding the scope of personal data processed and other relevant purposes, we have prepared separate sections in this Privacy Policy, as indicated below.

### **What is personal data/processing of personal data?**

**Personal data** is any information relating to you and that alone or in combination with other pieces of information gives the opportunity to the person that collects and processes such information to identify you as an individual. This can be your name, your identification number, your location data, information related to your physical, physiological, genetic, mental, economic, cultural or social life or any other information that may identify you.

**Processing of the data** means any action performed with your personal data, for example, collection, recording, organization, structuring, storage, use, disclosure by any means etc.

### **Legal bases for processing.**

Please note that we may process your personal data **not** only based on your consent, but also when one of the following is applicable:

- processing is necessary for the purposes of the COMPANY legitimate interests on the conditions prescribed by the data protection legislation. In particular, it is necessary to run the Website and to provide the Services, as defined in our Terms and Conditions;
- processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract;
- processing is necessary for the compliance with our legal obligations;
- processing is necessary to protect your vital interests or vital interests of another natural person;
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

In all cases, we will notify you about applied legal basis for processing and other relevant details per your request.

### **What personal data do we collect?**

When you interact with us, whether by using our Website or communicating with us, we may collect the following information about you:

**Information you give us:** you may give us information about yourself if you sign up for an account on our Website, complete any online forms (such as registration forms, competitions, and surveys), opt in to receive our newsletters and special offers, enter a competition or promotion, participate in social media functions with our Website, or correspond with us (by email, telephone, instant chat, social media or otherwise).

Depending on what you provide, this information can include your name, address or location, phone number and email address, date of birth, gender, purchase information, images and financial information (including your credit or debit card details, although we do not hold them, our payment processors do).

**Information we receive from other accounts or sources:** we can receive information about you from other sources, such as from your other accounts or other websites, including data brokers, our Partners, social media providers like Facebook, advertising networks and analytics partners, and payment and delivery service providers. By logging in to our mobile applications via Facebook, or linking your account on our Website to your Facebook accounts, you are giving us permission to obtain certain information and content from these accounts, such as your name, location, email address and profile picture. The specific types of information that we may obtain depends on your settings for that account or website, and will be subject to their privacy policies. We may combine such personal data with the personal data you provided to us to register your user account and communicate purchase information.

**Information our IT systems collect about you:** each time you visit the Website, certain information will be created and automatically recorded by our IT systems. That information includes: cookies and device information.

**Cookies.** The cookies are tiny pieces of code that remains in your computer after you have visited some website. These pieces then enable the server to provide you with the information that is customized with your needs when you use some platform or website for the next time. By giving your consent to the COMPANY for use cookies you make our website more efficient, fast, and safe, you improve its functioning. Nevertheless, you may block, delete, or disable saving cookies on your device if your web-browser allows to do this. You can read more on our Cookies Policy.

**Server log files.** Some data are collected automatically to run the Website, including browser type and browser version, operating system, referrer URL, host name of the accessing computer, and the time of the server request. We presume that these data cannot be personal, because the combination of these data is impossible. However, we reserve the right to check these data in retrospect in the case of proved illegal use.

**Usage data.** In order to improve and optimize the work of our website, in order to understand your needs and provide services that are relevant to you, we may collect your Usage Data. Usage Data reflect your behavior on our website: use our products or services, download documents from us, personal information in application forms on website, subscribe for alerts or newsletters, attend one of our events, or an event hosted at our premises, make a request/complaint, visit to our website, including your browsing experience, for example which pages you have viewed and for how long. We may collect such data only if you give us a consent to do so. You provide us with your consent by means of: clicking "OK" on Cookie Policy Notification and/or filling your personal data in the application forms on the Website. We collect Usage Data with the help of the following third-party services: Google Analytics, Google AdWords. With the use of Google Analytics, we collect such data as IP-Address, your device model, screen resolution and operation system, session durations, your location. Basing on these data, we analyze your needs and interests, evaluate effectiveness of our campaigns and improve our website to make its content relevant to you and the website itself – available for smooth viewing with your device. As well as we use this data for advertising campaign.

Please, note that we in no case sell your data. We also do not make any decisions based solely on automated processing, which produce legal effects concerning you or similarly significantly affect you.

If we decide to change the purposes of processing specified above, we will notify you of such changes before using your personal data for the new purposes through the update of this Privacy Policy.

Please, note that we may compile and publish some statistic information showing the number of registration, visits, purchases, requests or complaints we receive or other information. Such statistics will be totally anonymous.

If you do not want to provide us with the requested personal data for the purposes specified above, you may not have the access to certain Services, defined in the Terms and Conditions. Limited use of the Website is always possible without providing your personal data to us.

## Who will access your personal data?

In order to provide high-quality services, we hire people also cooperates with other services providers, companies and organizations. For these reasons, some of your personal data can be passed on to the persons mentioned above.

First of all, our employees may have access to your data. Then, we may transfer your data to our sub-contractors and affiliates. We secure such transmission by including standard contractual clauses adopted by the European Commission and compliant with the EU data protection laws into our data processing agreements. When providing us your personal data you agree to such transfer and processing within the purposes set in this Privacy Policy.

In all cases when we transfer your personal data to other persons, we are confident that your personal data is protected and used only for the purposes specified in this Privacy Policy. We achieve such safety by using only certified services and products, signing agreements on protection of personal data with contractors and partners, as well as taking technical measures to ensure the data is protected when stored and used, and also while being processed and transferred.

You also have to be aware of the fact that we may disclose your personal data to enforce and comply with the law. In other words, we may disclose information necessary for the investigation or legal process on official request or the official bodies acting within their powers.

Please, note that our Website may contain the links to other platforms and websites. This Privacy Policy does not cover the collection and processing of data from the moment when you follow such links. You will be governed by the conditions of the Privacy Policies of those platforms and websites. Thus, we encourage you to read that Privacy Policies carefully.

There are three reasons where we may share your data with third-parties that we have not listed here:

- **Professional Advisers and Investors:** We may also share your data with professional advisers such as our lawyers and insurers to manage risks and legal claims, and/or as part of our relationship and obligations to our investor organizations. This is in our legitimate interests.
- **Group:** It is possible we could sell our business to a third party or re-organize our business or become insolvent. In that scenario, our database of customers is one of the biggest parts of that business and so we would need to share it with the third-party buyer and their advisers. This is in the legitimate interests of selling our business.
- **Law Enforcement/Legal Compliance:** We will cooperate with all third parties to enforce their intellectual property or other rights. We will also cooperate with law enforcement requests from within or outside your country of residence. This may include disclosing your personal information to government or law enforcement agencies, or private parties, when we have a good faith belief that disclosure is required by law or when we, in our discretion, believe that disclosure is necessary to protect our legal rights, or those of third parties and/or to comply with a judicial proceeding, court order, fraud reduction or legal process served on us. In such cases, we may raise or waive any legal objection or right available to us. These uses of your data are in our legitimate interests of protecting our business security. We may also use your data and share it with the recipients listed in this Privacy Policy for the purpose of complying with our legal obligations.

## How we may use your data for marketing purposes and additional data we may request permission for.

Part of the role of the COMPANY is to market the Products and Services to enable more people to purchase items listed on the Website. To do so we use a number of different third-parties to help us with these initiatives. We see these anonymized transfers of data as critical to the running and future success of our business and you cannot opt-out of them if you use our Services.

In addition to the anonymized data we send to the third-parties, we may ask permission from you to use extended data to help give you a better service. A better service may include (but is not limited to):

- the ability for us to personalize our email communication to you based on identifiable information;
- the ability for us to place advertisements (including product listings) on the third-party websites based on your browsing or purchasing history with us;
- whilst browsing the Website, having us push relevant deals and information to you based on your specific interactions with the website.

For this we will ask you to opt-in to our marketing initiatives; you will automatically be opted-out of these services when you join the Website. If at any stage, you would like to opt in or out you can do so in your account settings.

## **What do you use my information for?**

To provide you the Service, the Website and to optimize your experience we need to use the information that we collect in a number of different ways.

We also use the information for marketing and advertising purposes. Where you have told us you would like to receive marketing communications or when you have made a purchase using our Services to occasionally send you updates, news, and offers via email, post, or other forms of media. We may use your information (including supplemental information received from partners that we append to our existing customer information as described below), to tailor these messages to you. You may unsubscribe from our email marketing communications by modifying your preferences in your account's profile management section, or by following the opt out instructions in the promotional emails that are sent to you.

We use third-party service providers to serve advertisements most relevant to you across your different devices and on our own and others' websites and mobile applications. In addition to the information about your visits to our website or usage of our mobile application, our service providers may also use the information about your interactions with other websites or applications to target advertisements for products available on the Website or from our Partners. For information about opting out of targeted advertising and controlling the use of cookies, please see the Cookies Policy.

Please scroll down to find out the detailed purposes for which we collect your information, what specific information is collected and the legal basis for which we purpose that data.

- To register and manage your account in our Website, we collect your name, email, password and other additional details you may wish to add in your account, like phone number, addresses and gender. The legal basis is the performance of a Contract with you.
- To administer, maintain and optimize our Website and our services, we collect your device information (such as your device IP address and device type), Cookie identifiers and browsing information. The legal basis is the legitimate interests in running our business.
- Carry on research, analysis, enquiries and surveys on your use of our website, we collect your Name; Addresses; Email; Device information, legal basis is our legitimate interests in running our business and improve our Website and your experience.
- Advertising and retarget advertising of our and our Partners' products and services, we collect your email, cookie identifiers and device information. The legal basis is our legitimate interests in running our business.
- To produce aggregated statistical reports, we use your order history, provided that the result of such reports do not identify you. The legal basis is our legitimate interests in running our business and improve our Website.
- To manage requests and complaints. When we receive a request or complaint ('enquiries') from a person, we create a file containing the details of the enquiry. This normally contains the identity of the requestor or complainant and any other individuals involved in the enquiry. We will use the personal data from your enquiry only in order to process the request or complaint, check on the level of our services and provide you with the comprehensive response. Such data will be processed on the contractual basis as we will use it to provide you with information you have intentionally requested. Without this data we will not be able to consider your issue and give you a response regarding it.

## **How long will the personal data be processed and stored by us?**

We store personal data in case we consider you to be potentially interested in our services or you are already our client. Your personal data will be stored by us no longer than is necessary for the purposes for which the personal data are processed. Thus, retention period depends on the purpose of processing and may be specified per your request.

We also store the personal data of subjects who agreed to the subscription to our newsletters. The data is stored until a subscriber asks to be unsubscribed in the respective email form.

After the expiration of retention period, we shall terminate the processing of your personal data or pseudonymize such data, unless stated otherwise under applicable laws.

## Transfers of your personal data.

To provide our Website and our Services, in accordance with the purposes set out above, we may transfer and store the personal information that we collect from you to a destination outside of the European Economic Area ("EEA").

When transferring personal information to one of our third-party services' providers set out above, we rely on different adequacy measures, as set out below:

- Privacy Shield: Some of our third party providers based in the US, where we transfer your information to, comply with the US Department of Commerce's EU-US Privacy Shield and have certified that adhere to the EU-US Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. For more information about the EU-US Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield website.
- Model Clauses: We rely in the Commission's model contracts for the transfer of personal data to third countries (i.e. the standard contractual clauses) pursuant to Decision 2010/87/EU when transferring your information to our US service providers who do not adhere to the US Department of Commerce's EU-US Privacy Shield.

## Your rights regarding your personal data we processed

Under the data protection laws, you have rights we need to make you aware of. The rights available to you depend on the legal basis for processing of your personal data:

1. **Right to access to your personal data and right to data portability** You have the right to request us an access to your personal data and to know the source of these personal data. You may request to be provided with your personal data in a structured, commonly used, and machine-readable format. You also have the right to transmit those data to another controller, if the processing is based on your consent or on contract and the processing is carried out by automated means. You can also ask for the clarifications on the information described above, i.e. purpose of collecting and processing, period of processing, third parties which have access to information.
2. **Right to request a rectification of your personal data** You have the right to request rectification of inaccurate personal data or request that incomplete data be completed.
3. **Right to request an erasure of personal data** You have the right to request us an erasure of your personal data if its processing is no longer needed in relation to the purposes for which they were collected, and also if there are no legitimate grounds for the processing.

- 4. Right to restrict the processing of your personal data**

You have the right to request a restriction of processing of your personal data if you dispute the accuracy of your data, or we no longer need these data for processing purposes and if you are against the processing of the data.
- 5. Right to withdraw your consent**

You have the right to withdraw your consent for the collection and processing of your personal data at any time by contacting us. After your request, we will process such request in a timely manner and we will no longer process your personal data unless stated otherwise under applicable laws.
- 6. Right to object to the processing of your personal data**

You have the right to object to processing of your personal data on the basis of legitimate interest or as part of a task in the public interest or for an official authority; or we process your data to pursue our or third party's legitimate interests, and you believe that such interests are overridden by your interests or fundamental rights and freedoms. However, in some specific cases, the public interest may prevail and we may be allowed to continue using your personal data.
- 7. Right to lodge a complaint**

You have the right to lodge a complaint directly with us at [wp@oton.technology](mailto:wp@oton.technology) or with the competent data protection authority in the case you consider our processing of your personal data as non-compliant with the applicable data protection laws.

If you make a request objecting to processing, we will no longer process the personal data unless we are able to demonstrate compelling legitimate grounds for the processing.

Please, note that when processing of your personal data is carried for direct marketing purposes, you have the right to object at any time to such processing without providing any justification. We will no longer process your data for such direct marketing purposes. You may refer relevant sections of this Privacy Policy to learn whether we process your data for direct marketing purposes.

Any requests to exercise your rights can be directed to us through the contact details provided below. These requests are free of charge.

## **Time for reply and reaction.**

We will provide information about the actions taken on your request, within one month after receiving the request. This period may be extended by two further months if we consider it necessary, considering the complexity and number of the requests. We will notify you about such renewal within one month of the receipt of the request together with the reasons for such delay.

## **How we protect personal data?**

We process your data by using computers and/or other IT enabled tools. We take both technical and organizational measures to ensure that your personal data are processed in a manner that provides appro-

appropriate security of information, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

We use verified contractors, with whom we sign data processing agreements, who might have access to your personal data. We also guide and train our personnel to process your data securely and in accordance with our internal data protection policies.

We use only secure places of storage, such as provided its own or rent servers located in Germany and Holland.

## **Are you already 18 years old?**

Our Website is intended for adult use only. We do not knowingly collect data from minors under 18 years old and its Website does not target such minors. We encourage parents and legal guardians to take an active role in their children's online activities as well as their interests and ask the minors not to submit any personal data to us.

## **Breach notifications**

If any of your personal data is stolen, lost or illegally accessed - known as a personal data breach - we would inform you as well as the respective data protection agencies as to such accidents without undue delay. We would also inform you directly if there are serious risks related to your personal data or privacy due to the personal data breach. We will do our best to minimize any possible risks related to personal data breach.

We hope this Privacy Policy helped you to understand how we process your personal data at the COMPANY. If you have any questions or comments with regard to this Privacy Policy, please do not hesitate to contact us at [wp@oton.technology](mailto:wp@oton.technology).

## **Our contact information**

**OTON Technology Limited**,  
registered number 182391,  
registered office: Suite 3, 1st Floor, La Ciotat Building, Mont Fleuri, Mahe, Seychelles