

PRIVACY POLICY

Last updated: 21.08.2024

This Privacy Policy applies to personal information collected, processed, or stored by **Playhub** (hereinafter – “Platform”, “we” or “us”) and describes the extent of collection and use of personal information by **Dealix Limited**, a company incorporated under the laws of Cyprus with registered number HE460113 and having registered address at 25 Martiou, 27, D. Michael Tower, office 105A, ‘Egkomi, 2408, Nicosia, Cyprus, which is a data controller of personal information processed in accordance with this Privacy Policy.

We give special attention to the confidentiality of information provided to us when you visit our website or otherwise communicate with us.

Definitions

Personal information means information that (either in isolation or in combination with other information) enables you to be directly or indirectly identified (hereinafter – “Personal Information” or “Personal Data”)

Data controller (hereinafter – “Controller”) is a party that sets out the purposes and means of processing of Personal Information. **Data processor** or a Service Provider/Contractor/Third Party (“Processor” or “Third Party”) is a party that processes Personal Information on the Controller’s behalf.

Services (hereinafter – “Services”) means technical support provided by Dealix Ltd to enable and facilitate marketplace for Users of the Platform.

1. GENERAL PROVISIONS

- 1.1. This document, the Playhub Privacy Policy (hereinafter – the Policy), contains our policies and provisions concerning the information collected about you by Playhub.
- 1.2. By visiting our Platform and using our Services you accept all terms and conditions of this Policy.
- 1.3. This Policy is a part of a body of documents that sets terms and conditions of use of the platform Playhub – Terms of Service, Cookie Policy. Unless defined otherwise by this Policy, all terms and definitions used herein shall have the meaning defined in the abovementioned documents.
- 1.4. This Policy, including its construction, method of adoption, performance, amendments, and termination, is subject to the legislation of the Republic of Cyprus.

2. INFORMATION WE COLLECT

- 2.1. We may collect information, including personal information, about you when you provide it to us, when you use our Platform, and when other sources provide it to us, as further described below.
- 2.2. We process the following categories of personal information:
 - Information provided directly by you;
 - Information collected automatically.

2.2.1. Information provided directly by you

- Account and user information. We collect information about you such as email address, password when you register an account, create or modify user information, and/or provide any other related information to access or use our Platform.
We collect abovementioned data for the following purposes: 1) verifying your identity; 2) processing your registration as a user, and maintaining and managing your registration; 3) providing you with customer service and responding to your inquiries, claims or disputes; 4) notifying you about important functionality changes and alterations to the Platform (including changes to this Privacy Policy and/or the User Agreement); 5) internal record keeping; 6) anti-fraud activity.
- Payment information* you provide during an Order, or other transaction and order-based content that you generate or that is connected to your account as a result of a transaction and the appropriate Order you are involved in (part of a credit and/or debit card number, cardholder, number of e-Wallet (if applicable) and related e-mail address for e-Wallet (if applicable)).

*Please pay your attention to the following: we DO NOT STORE AND DO NOT HAVE AN ACCESS to your card expiry date, billing address and CV code. For Visa cards, we DO NOT HAVE A FULL ACCESS to the card number (e.g. 1234 5678 **** **00).

2.2.2. Information automatically collected by third-party services

Intercom. We use third-party analytics services to help understand your usage of our Services. In particular, we provide a limited amount of your information (such as sign-up date and some personal information like your email address) to Intercom, Inc. (“Intercom”) and utilize Intercom to collect data for analytic purposes when you visit our website or use our product. Intercom analyzes your use of our website and/or product and tracks our relationship by using cookies and similar technologies so that we can improve our service to you. For more information on Intercom's use of cookies and collection of personal data, please visit Intercom's [Cookie policy](#) and [Privacy Policy](#).

Sumsub. Sumsub is a verification platform that helps businesses monitor fraud worldwide and at every step of customers’ journey. With the help of Sumsub we can verify users, businesses, and transactions, as well as manage cases and customize flows. We use third-party service to perform verification of the Sellers before transferring the funds to their cards. We use Sumsub for KYC purposes in order to prevent fraud schemes in the process of withdrawing money from the Platform's internal balance to the Users' accounts. For more information on Sumsub's use of cookies and collection of personal data, please visit Sumsub's [Cookie policy](#) and [Privacy Policy](#).

Mailgun. Mailgun is how modern companies work with email. The platform’s ease of use, world-class support, and powerful APIs empower smart development teams to reach real customers at scale with a data-driven approach, so their organization can grow faster. We use this service to send registration confirmation, password reset, order confirmation and marketing emails. For more information on Mailgun's use of cookies and collection of personal data, please visit Mailgun's [Cookie policy](#) and [Privacy Policy](#).

Mandrill. Mandrill is Mailchimp add-on that allows to send one-to-one transactional emails triggered by user actions, like requesting a password or placing an order. We use this service to send registration confirmation, password reset, order confirmation and marketing emails. For more information on

Mandrill's use of cookies and collection of personal data, please visit Mandrill's [Cookie policy](#) and [Privacy Policy](#).

Sendgrid (Twilio). SendGrid is a service trusted by extraordinary businesses to provide reliable, scalable email infrastructure. This proprietary mail transfer agent (MTA) delivers powerful performance—sending over 90 billion emails monthly with a median delivery speed of 1.9 seconds. Globally distributed, cloud-based architecture provides a solid foundation for our email program. We use this service to send registration confirmation, password reset, order confirmation and marketing emails. For more information on Sendgrid's use of cookies and collection of personal data, please visit Sendgrid's [Privacy Policy](#).

Google Analytics. Google Analytics is a web analytics service provided by Google, Inc. Google Analytics uses cookies to help analyze how visitors use the website. The information generated by the cookies is transmitted to and stored by Google. Google Analytics helps us understand the use of our website by visitors. Because Google Analytics requires cookies to function, users who wish to avoid tracking by Google Analytics while on our website can disable cookies in their browser. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. For more information about how Google uses data, please visit www.google.com/policies/privacy/partners/ .

3. YOUR RIGHTS

Under applicable data protection law, as the data subject you have the following rights, we need to make you aware of. The rights listed below depend on our reason for collecting and processing your information.

- **Right of access.** You have the right to obtain from the controller following information:
 - a. confirmation as to whether or not Personal Data concerning you are being processed
 - b. purposes of the processing;
 - c. categories of Personal Data concerned;
 - d. recipients or categories of recipient to whom the Personal Data have been or will be disclosed;
 - e. a copy of the Personal Data undergoing processing in accordance with the applicable law;
 - f. existence of automated decision-making, including profiling.
- **Right to rectification.**
 - a. You can request to change your incomplete Personal Data;
 - b. You can request to erase/delete your Personal Data.
- **Right to erasure.** You may ask us to delete your personal information in certain circumstances, for example, if your personal information is no longer needed for its processing or if you want to withdraw your consent. If we share your personal information with others, we will notify them that they need to erase your information where it is possible. However, we may retain part of your Personal Data, if necessary, to comply with our legal or professional obligations, enforce our agreements, or resolve disputes. For these purposes, we retain part of your Personal Data for 6 years after the date it is no longer needed by us for any transactions, fulfilling contract purposes or marketing communications.
- **Right to restriction of processing.** You have the right to ask us to restrict the processing of your data in cases determined by applicable law.

- **Right to object to processing.** You have the right to obtain from the Controller restriction of processing where one of the following applies:
 - the accuracy of the Personal Data is contested by the User;
 - the processing is unlawful and the User opposes the erasure of the Personal Data and requests the restriction of their use instead;
 - the Controller no longer needs the Personal Data for the purposes of the processing, but they are required by the User for the establishment, exercise or defense of legal claims;
- **Right to data portability.** You have the right to receive your Personal Data, which was provided to the Controller, in a structured, commonly used and machine-readable format, and have the right to transmit those data to another controller without hindrance from us.
- **Right to withdraw a consent.** If we rely on your consent to process your personal information, you have the right to withdraw that consent at any time, but this will not affect any processing of your data that has already taken place.
- **Right for a complaint to a supervisory authority.** We work to high standards when it comes to processing your personal information. If you have queries or concerns, please contact us at support@playhub.com and we'll respond. If you have a concern about our privacy practices, including the way we handle your personal information, you can report it to data protection authority that is authorized to hear those concerns – for example, the [Commissioner for personal data protection](#), as our business activity is located on Cyprus. You can contact the Commissioner for personal data protection at commissioner@dataprotection.gov.cy.
- **Right to non-discrimination.** We will not discriminate against you (e.g., through denying provision of Services or providing a different level or quality of Services) for exercising any of the rights available to you.

4. LEGAL BASIS

Besides your consent to processing of Personal Data, we collect information about you under the following legal basis:

Our legitimate interest and legal and professional obligations which include the following cases:

- to detect, prevent and investigate fraud or other potentially prohibited or unlawful activities;
- to ensure access to the Services;
- to post advertisements and other content which helps us to improve the quality of the Services, to keep the Services operational and to adapt them to what users like based on users' actions on the website;
- to contact you regarding your account actions, potential troubleshoot issues, resolving disputes or provide other necessary services.

To make sure that the Personal Data we process is necessary for the interests mentioned above, we perform a Legitimate Interests Assessment which consists of the following test:

1. The assessment of whether a legitimate interest exists;
2. The establishment of the necessity of processing; and
3. The performance of the aforementioned balancing test.

Through this test we analyze the impact of processing, the nature of the interests and whether they can apply and the safeguards measures which we shall put in place.

5. DATA RETENTION PERIOD

We retain Personal Data for as long as your account is active or as necessary for the duration of the purposes outlined in this Privacy Policy. Notwithstanding the duration of the purposes or the status of your account, we may retain part of your Personal Data, if necessary, to comply with our legal or professional obligations, enforce our agreements, or resolve disputes. For this purpose, we retain part of your Personal Data for 6 years after the date it is no longer needed by us for any transactions, fulfilling contract purposes or marketing communications.

6. CHILDREN'S PRIVACY PROTECTION

We understand the importance of protecting children's online privacy. Our Platform is considered to be general audience and is targeted at adults of the legal age of majority in his/her country and state of residence. If a child has provided us with Personal Data, the parent or guardian should contact us to remove such information.

7. MEASURES WE APPLY FOR THE INFORMATION SECURITY

We have in place reasonable commercial standards of technology and operational security and appropriate legal measures to protect all personal information provided by Users from unauthorized access, disclosure, alteration, risks of loss, misuse or unlawful erasure, as well as from any other unauthorized form of processing.

We are eager to comply with international standards of personal data protection. Also, we'd like to inform you that your Personal information transferred via your account is secured according to mentioned measures, however we recommend that you do not disclose your account credentials to anyone. If you share a computer with others, you should not choose to save your log-in information (e.g., user ID and password) on that shared computer. Remember to sign out of your account and close your browser window when you have finished your session.

We kindly ask you to note that we cannot guarantee the privacy or security of your Personal Data once you provide it for any third party and we encourage you to evaluate the privacy policy before deciding to share your Personal Data.

8. DISCLOSURE OF INFORMATION TO THIRD PARTIES

We may disclose and transmit (whether within or outside the jurisdiction of the Controller) your Personal Data to our business partners and to hosting providers engaged by us to assist us to provide Services to you or to otherwise process Personal Data for the purposes described in this Privacy Policy, or notified to you when we collect your Personal Data. Your personal information may also be disclosed to employees of the Controller and its legal consultants in order to respond to your requests or inquiries.

Your personal information may also be disclosed to law enforcement, regulatory or other government bodies, or to other third parties, in each case to comply with legal, regulatory, or national security obligations or requests.

All of these disclosures may involve the transfer of personal information to countries or regions without data protection rules similar to those in effect in your area of residence. Where we transfer your personal data as described above, we will take measures to ensure that your personal data receives adequate security protection

where it is processed and your rights continue to be protected pursuant to the applicable data protection law, including through the use of Standard Contractual Clauses approved by the European Commission. If you would like to receive more information on the safeguards that we implement as described above, please contact us as indicated below.

9. CHANGES TO THIS PRIVACY POLICY AND FUTURE DEVELOPMENTS

We continually improve and update our Platform to enhance your experience and the Services we provide for you. As a result, our Privacy Policy continues to evolve. As soon as we implement new technology or provide new Services, we will update our Privacy Policy accordingly. We encourage you to refer to this page on an ongoing basis for our most current Privacy Policy and practices.

If our information practices change at any time in the future, we will post the policy changes on this page including the effective date of the amended version of the Privacy Policy and such modified or amended Privacy Policy shall be effective as to you and your information as of that effective date. If we make any material changes, we will announce it and notify you by means of a notice on this website.

10. FINAL PROVISIONS

- 10.1. We may scan messages automatically and check for spam, viruses, phishing and other malicious activity, illegal or prohibited content or violations of our usage policies, this Privacy Policy and the Cookie Policy.
- 10.2. We may process and retain your Personal Data on our servers.
- 10.3. These Privacy Policy provisions are subject to the law of Cyprus. All the disputes regarding the provisions of this Privacy Policy shall be settled by negotiation and, in case of failure to resolve an issue by negotiation, the dispute shall be taken to courts of Cyprus.
- 10.4. By visiting our Platform and/or using the Services of the Platform, you acknowledge and confirm that you have read the Privacy Policy, understand it and agree with it. We kindly ask you to note that when visiting this website, you have a responsibility to make sure that you are familiar with the latest version of the Privacy Policy that applies to you at the time you are visiting the website.