

# GamoVation Affiliate Platform - Privacy Policy / GDPR

*Version: April 2018*

GamoVation B.V. ("GamoVation", "we", "us") respects the privacy of the affiliates ("Affiliate", "you") of the affiliate platform ("Platform") and is committed to protect the Affiliate's information. We believe that you have a right to know our practices regarding the information we may collect and use when you use our Platform.

## 1. Your Consent

BY CREATING AN AFFILIATE ACCOUNT, ENTERING INTO, CONNECTING TO, ACCESSING AND/OR USING THE PLATFORM, YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY, INCLUDING TO THE POSSIBLE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION. PLEASE NOTE: IF YOU OR, AS APPLICABLE, YOUR LEGAL GUARDIAN, DISAGREE TO ANY TERM PROVIDED HEREIN, YOU MUST NOT CREATE, ACCESS AND/OR USE THE PLATFORM AND YOU ARE REQUESTED TO STOP USING THE PLATFORM THROUGH YOUR BROWSER AND DO NOT ENTER TO, CONNECT TO, ACCESS OR USE ANY OF OUR SERVICES RELATED TO THE PLATFORM.

## 2. Subject matter of this Privacy Policy

This Privacy Policy applies to the Platform.

Unless stated otherwise, this Privacy Policy is exclusively in place to regulate how GamoVation treats your personal information. If you make use of services provided by third parties, only the Privacy Policy conditions of these third parties shall apply. Please refer to their Privacy Policy.

### 3. Which information may be collected from Affiliates of the Platform?

In this Privacy Policy "information" means any personal information about you which could identify you (by itself or in combination with other data) such as your name, address or email address.

We may collect the following data about you:

#### **Data you give us directly**

- if you register with us (such as your date of birth, password and email address);
- financial information you provide us when registering like bank account, bank holder, bank name, address, real name and/or company name, VAT ID, Paypal address which we need to process payouts and create the self-billing invoice;
- information you provide us if you report a problem with our Platform.

#### **Data we may collect when you use our Game (whether or not you register with us)**

- data about your location, device type, operating system and platform;
- mobile device identifiers (such as your unique device ID (persistent/non-persistent, hardware type, medial access control ("MAC") address, international mobile equipment identity ("IMEI"), OS, and your device name;
- data about your computer's browser version, operating system version, page loading time, network, generated device identifier information, hashed MAC address and IP address.

With this list, we try to be as clear and complete as possible, but we find it important to keep this Privacy Policy legible, so there may be other information we collect.

### 4. How do we use your information?

We may use your data in the following ways:

- To provide you the Platform and associated websites and continuously improve their features;
- To store your statistics history like amount of new leads and revenues;
- To provide helpdesk and support services;
- To customise the Platform which is available to you;
- To ensure that you are in compliance with our terms;
- To enable payouts to your bank or paypal account;
- To generate self-billing invoices;
- To improve the Platform;
- To personalise your experience;
- To prevent fraud and crime;
- To meet legal and tax obligations;
- Emails (regarding updates, newsletter, new design, new features, (new) games etc.);
- Administrative purposes, such as notification of a violation of our terms of use.

## 5. Third parties

We use a range of third parties to help us manage your information and the Platform, such as our cloud service provider, Customer Service provider, developers, marketing companies, email providers, email sending providers, payment providers and IT maintenance provider. These are companies who process data on our behalf and cannot use it for their own independent purposes.

### **PSP / BANKS / PAYPAL**

GamoVation may also use third party payment service providers (“PSP”), who provide payment transaction services to GamoVation. You explicitly consent that GamoVation may provide personal information collected from you to a PSP for the purpose of offering the payment transaction service and that the PSP may use such data for (statistical) analysis of payment transactions. GamoVation shall be allowed to notify a PSP regarding an Affiliate who engages in (or who a party believes has engaged in) any activity that is illegal, that violates any person’s rights, or that resulted in such Affiliate’s suspension or termination of use of the Platform.

### **Developers**

The Platform will continuously be monitored and improved to maintain and effectuate the best experience for our Affiliates. Developers may therefore see and have access to your

information, but they will only use this information for optimization and development purposes.

### **Other**

We may supply information to other parties if we are required to do so by law or by a ruling from a court of law.

## **6. Storage location of your information & retention**

The data that we collect from you may be transferred to, and stored at, a destination outside of the Netherlands or the European Economic Area ("EEA"). It may also be processed by one of our third-party partners operating outside of the Netherlands or EEA. This transfer is required to host the Platform, provide you with support and payment services, perform backups of your data, allow you to use the Platform and the Website and to process your payment details.

We will always ensure that any such transfers are conducted in accordance with relevant laws in order to ensure adequate protection.

We will keep data only for as long as it is relevant and useful for the purpose for which it was originally collected and otherwise where required by law. If you decide to delete an account you have with us, certain data does stay on our GamoVation system for administrative purposes and to defend or bring any legal action.

## **7. Access to information**

You have the right to request access to the information we have on you. You can do this by contacting us at [info@gamovation.com](mailto:info@gamovation.com). We will make sure to provide you with a copy of the data we process about you. In order to comply with your request, we may ask you to verify your identity.

We will fulfill your request by sending your copy electronically. For any subsequent access request, we may charge you with an administrative fee.

## **8. Information correction & deletion**

If you believe that the information we have about you is incorrect, you are welcome to contact us so we can update it and keep your data accurate.

If at any point you wish for GamoVation to delete information about you, you can simply contact us at [info@gamovation.com](mailto:info@gamovation.com).

## 9. Information security and accuracy

We intend to protect your personal information and to maintain its accuracy. GamoVation implements reasonable physical, administrative and technical safeguards to help us protect your personal information from unauthorized access, use and disclosure. For example, we encrypt certain sensitive personal information such as passwords. We also require that our partners protect such information from unauthorized access, use and disclosure.

Whilst we will do our best to protect your data, the transmission of information by you to us is not completely secure and we cannot guarantee the security of your data. Any transmission is at your own risk. Once we have received your data, we will use the procedures and security features outlined in this section to try to prevent any unauthorised access.

## 10. What can I do if I have a complaint?

If you are not satisfied with the way your query or complaint is handled by GamoVation, please let us know by emailing us at [info@gamovation.com](mailto:info@gamovation.com). If you are still unhappy, you may refer your complaint to your local data protection regulator. For example, in the Netherlands this is the Autoriteit Persoonsgegevens (<https://autoriteitpersoonsgegevens.nl>).

## 11. Questions and contact information

If you have a question about this Privacy Statement or GamoVation's handling of your information, you can send an email to us at [info@gamovation.com](mailto:info@gamovation.com). You can also contact us at:

GamoVation B.V.  
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8025 BM Zwolle  
the Netherlands

Trade register number: 51193612  
VAT ID: NL823142292B01

## 12. Governing law

This Privacy Policy shall be governed by the laws of the Netherlands and submitted to the exclusive jurisdiction of the courts in the Netherlands.