

PRIVACY POLICY

VERSION OF December 26, 2020

This Privacy Policy (this Policy) sets forth the specifics of collection and processing by Tzigkarero LTD of data of individual users of tzigkarero.com and of all related products and services at the tzigkarero.com (referred to as Site).

This Policy describes how and what user data is collected by the Company, how this data is subsequently processed and used. This Policy applies to the Site and is posted and is constantly available at tzigkarero.com

When downloading, accessing or otherwise using the Site, you fully accept the terms of this Policy and express your clear voluntary consent to the processing of your data in the manner and for the purposes set forth herein. If you do not agree to this Policy, please refrain from accessing and using the Site or any other use thereof.

Tzigkarero LTD may from time to time modify and/or supplement this Policy without prior written notice to users. The new versions hereof will be published at tzigkarero.com. You need to familiarize yourself with this Policy every three calendar days to track the changes and/or amendments hereto. If you continue to use the Site after any changes have been made hereto, you confirm your agreement to the new version hereof.

Some technical terms used in this Policy are given without explanation. If you do not know a term (for example, «IP-address»), please read its description on public Internet resources. If the meaning of this term has not been clarified, please contact Tzigkarero LTD (which contact details are listed in Section 9 hereof), and we will do our best to help you.

1. DATA CONTROLLER

Tzigkarero LTD (referred to as «we», «us», «our» or «Company» in this policy) is the «data controller» of all personal information that is collected and used about user for the purposes of providing access to the Site. Tzigkarero LTD, a company incorporated and existing under the laws of the Republic of Cyprus, registered number HE 395084, whose registered address is at Aigaiou, 83, Flat/Office 104, Lakatamia, 2302, Nicosia, Cyprus.

We may engage third parties to provide services on our behalf. The third party will be a «data controller» of your personal data in respect of the service they are providing. You should access the privacy policies/statements of those providers directly.

2. PURPOSES OF PROCESSING DATA

The data is provided by you in connection with the use of the Site and related products and services (if available).

The Company is committed to protecting our customer privacy and takes its responsibility regarding the security of customer information very seriously. We will be clear and transparent about the information we are collecting and what we will do with that information.

The Company collects and processes your data in order to make the Site's operation more convenient, faster and safer for you, as well as to keep you posted on the Site's latest developments and functionality. This data enables the Company to maintain and develop the current functionalities of the Site.

Therefore, your data is processed by both the Company and its affiliates and partners.

Cases of data provision by you (without limitation):

- When using the Site in any way, including, in particular, by subscribing to news;
- When accessing the Site with identifiers used by you to get access to third-party resources (such as your login or ID used in social media) or when inviting other users to use the Site;

- When sending requests, letters or other types of communications with the Company;
- When receiving requests from authorised agencies (in particular, state agencies responsible for information security, as well as interstate agencies), in cases established by the applicable law.

Your data is processed for the following purposes (without limitation):

- maintaining and administrating the Site;
- enabling the use of the Site and services;
- sending notifications and other important messages regarding the Site and its functionalities;
- analysis of the Site’s effectiveness;
- processing of the data that was manifestly made public by you where it is accessible by other users of the Site;
- informing you about the current status of the Site, events related to the Site, their updates and other similar events (for example, informing you about the launch of new opportunities for the Site), as well as about events related to the Company’s other services;
- compliance with any contractual, legal or regulatory obligations under any applicable law;
- marketing and contact you with information regarding promotions and ancillary products via e-mail, sms, push notifications, phone and / or post. If you publicly post about us, or communicate directly with us, on a social media website, we may collect and process the data contained in such posts or in your public profile for the purpose of addressing any customer service requests you may have and to monitor and influence public opinion of us.

3. DATA

When we refer to “DATA” in this Policy, we mean information that relates to you. Your personal data may include for example your name, your contact details, information relating to your using partner’s services or information on how you use our Site and or you interact with us.

The data collected and processed by the Company/its affiliates and partners in connection with your use of the Site may include (without limitation):

- Your email address for the Site;
- Your name, last name, nickname;
- Your language preferences;
- Your date of birth;
- Technical information about your device, operating system, applications and peripherals, which can be collected regularly for the purpose of providing updates to the Site and other possible services in connection with the Site;
- Your other personal information that you explicitly provide to us or send it as part of communication with us via the Site or any other means (like forums, chats), and also when you provide feedback or user generated content.

In order to provide quality services, the Company collects and processes additional non-personal data (without limitation):

- Your IP address;
- Your language and country of residence;
- Version of the operating system of your mobile device;
- Name of the country from which you access the Site;
- Statistics that can be obtained based on your use of the Site;
- Your messages send via the Site chat (if this function is available);
- Data provided by you to obtain the Company’s support for the Site or any other inquiries;
- Technical information about your device, operating system, applications and peripherals, display resolution, which can be collected regularly for the purpose of providing updates to the Site and other possible services in connection with the Site;
- Information provided by cookies or similar technology according to Cookie Policy ([link](#))

We may request additional data necessary for service provision.

You are hereby informed and understand that when you access the Site using your social network account (if such a function is provided), data that is contained in your profile, including, but not limited to: name, photo or other image used as an avatar, ID number in this social network, e-mail address, language and other information which became available to the Company and may be processed by the Company/its affiliates and partners in the manner established by this Policy. In addition, in this case, this data may be viewed by other users of the Site.

Please note, if you do not want us to process sensitive and special categories of data about you (including data relating to your health, racial or ethnic origin, political opinion, religious or philosophical beliefs, sex life, and your sexual orientation) you should take care not to post this information or share this data when using the Site.

Once you have provided this data it will be accessible by other Site users and it becomes difficult for us to remove this data.

Make sure you read all the agreements/policies of the social network you use.

Subject to your separate consent or where explicitly permitted under applicable laws on email marketing, we may send you marketing messages about products and services offered on the Site to your email address. In such a case we may also use your collected information to customise such marketing messages as well as collect information on whether you opened such messages and which links in their text you followed.

Please note, if you withdraw your consent to processing or you do not provide the data that we require in order to maintain and administer the Services, you may not be able to access the Services or register with the web pages.

4. DATA USAGE, DISSEMINATION AND TRANSFER

The primary principle is that we will not use any data other than for the purpose for which it was collected other than with your permission. The purpose of collection is determined by the circumstances in which the information was collected and/or submitted.

The Company may collect, record, organize, store, modify, combine, group, depersonalize, delete, modify and use your data with other information (including other data collected by the Company, as defined in Section 4 hereof) for the maintenance, management and development of the Site and related products and services.

The Company may, for purposes such as ensuring the Site's operation and provision of related services, provide your data to its affiliates, partners.

For the purpose of providing related services for the Site, the Company may provide your personal data to advertising services, to services that provide tools for the Site analysis, as well as to services, which ensure necessary checks of your identity.

The Company does not sell your data to third parties.

You hereby express your voluntary consent that your data can be provided to third parties in the following cases:

- in cases listed in Section 4 above;
- to comply with legal requirements, for example, investigation of fraud in payment transactions and any other illegal activities;
- where there are reasonable suspicions of a potential or existing violation of the rights of the Company, its affiliates, the owners of the Site and related products or other users, in order to protect the rights of the affected party;
- in cases of violation of intellectual property rights;
- as required by any law including court orders; and/or
- in order to sell our business (as we may transfer data to a new owner).

The Site may contain links to sites operated by third parties. We are not responsible for your data privacy when you access these links or engage with third party services and you should ensure you review the relevant third party's privacy statement which will govern your data privacy rights.

We bear no liability for the actions of third parties which, as the result of your use of the internet or the Site, obtain access to your information.

5. DATA STORAGE

The data storage period is the time during which the Site exists, unless otherwise provided for by the applicable law (for example, for the purpose of accounting or compliance with tax laws).

The countries to which we transfer your data may not have the same data protection laws as your jurisdiction. We take reasonable cyber security measures to ensure your data is adequately protected.

6. RIGHTS

You have the following rights, in certain circumstances, in relation to your personal information:

- Right to access your personal information;
- Right to rectify your personal information: you can request that we update, block or delete your personal data, if the data is incomplete, outdated, incorrect, unlawfully received or no longer relevant for the purpose of processing;
- Right to restrict the use of your personal information;
- Right to request that your personal information is erased;
- Right to object to processing of your personal information;
- Right to data portability (in certain specific circumstances);
- Right not to be subject to an automated decision;
- Right to lodge a complaint with a supervisory authority.

You also have a right to independently remove personal information on your account and make changes and corrections to your information, provided that such changes and corrections contain up-to-date and true information. You can also view an overview of the information we hold about you.

If you would like to exercise these rights, please contact us via email at tzigkarero@gmail.com. We will aim to respond to you within 30 days from receipt of request. We will need to verify your identity before we are able to disclose any personal data to you.

7. THE SAFETY AND SECURITY OF DATA

We take technical, organizational and legal measures, including, where suitable, encryption, to ensure that your personal data are protected from unauthorized or accidental access, deletion, modification, blocking, copying and dissemination.

The security of online transactions and the security of communications sent by electronic means or by post cannot be guaranteed. When you provide information to us via the internet or by post you do so at your own risk. We cannot accept responsibility for misuse or loss of, or unauthorised access to, data where the security of information is not within our control.

We are not responsible for the privacy or security practices of any third party (including third parties to that we are permitted to disclose your data to in accordance with this Policy or any applicable laws). The collection and use of your information by such third parties may be subject to separate privacy and security policies.

If you suspect any misuse or loss of, or unauthorised access to your data, you should let us know immediately.

We are not liable for any loss, damage or claim arising out of another person's use of the data where we were authorised to provide that person with the data.

8. OTHER PROVISIONS

You are responsible for the completeness and reliability of the data you provide. In case of any inconsistency and/or incorrectness in the data provided by you, it shall be amended, including by contacting the Company's representatives, as specified in Section 9 Contacts.

When you delete and/or amend your data, the Company reserves the right to store the data necessary to comply with the applicable laws, ensuring the Site's safety and effectiveness.

When you contact the Company, it may request additional data necessary for the consideration of the relevant request. If you do not provide such data, the request may not be processed.

9.CONTACTS

If you have any questions regarding this Policy or handling of your data in connection with the use of the Site, you can contact us at: Aigaiou, 83, Flat/Office 104, Lakatamia, 2302, Nicosia, Cyprus (Tzigkarero LTD) or by email: tzigkarero@gmail.com. Please, specify your name and other information necessary for full and complete consideration of your request.