

PRIVACY POLICY

PaySuper respects the data-protection rights of users and complies with all applicable data-protection laws and regulations. By way of this privacy policy, we inform the public of the nature, scope, and purposes of the personal data we collect, use, and process, as well as of the rights to which users are entitled.

Please read our privacy policy carefully to get a clear understanding of the way we handle your personal data on our website.

1. General Provisions

The primary purposes and lawful basis for processing your personal data is to perform our obligations under the End User License Agreement (“EULA”) and provide you access to the digital content and features of the PaySuper digital marketplace, as well as to comply with applicable laws.

In this Privacy Policy, we use the definitions of the terms contained in the General Data Protection Regulation (GDPR) and EULA. In the event that you feel uncertain about the exact meaning of some of the terms or provisions envisaged in this Privacy Policy, you may contact us by email or via the support service (see Section 9).

2. Information We May Collect

Note that the provision of data in a volume allowing us to uniquely and unambiguously identify you is not a requirement for visiting the PaySuper website and digital storefront. However, we may collect and process certain personal information when you make purchases or use our services. The scope and nature of this information is described below.

When you make purchases and use a PaySuper account, we may collect and process the following data:

- email address
- IP address
- location and billing address (such as country, state or province, city, and zip code)
- preferred language
- digital content purchase history (such as date, item, cost of license, and taxes)
- cookies (see Section 3 for further details)

When you contact our support service, we may collect and process information and data you provide over the course of handling your tickets.

We do not collect, store, or process your debit and credit card information. All payments related to our services are processed through independent payment service providers that comply with applicable rules and regulations and policies established by competent governmental and non-governmental authorities (e.g. payment systems).

We do not collect, store, or process any specific categories of personal data, such as data regarding your racial or ethnic origin, political views, religion, philosophical beliefs, trade unions membership, genetic data, biometric data, or data pertaining to your health, sex life, or sexual orientation.

3. Cookies

Cookies refer to electronic information that may be stored on the user's device and enables the website to remember the user's actions and preferences over a period of time.

Our websites may employ cookies in order to identify the user's hardware and software (including their browser), customize their preferences, and keep a record of their actions in the PaySuper digital marketplace. We use the following categories of cookies:

- Session and authorization cookies, which allow the user to quickly select preferred payment methods and email address

- Analytical cookies, which may also include web beacons and pixel tags We may also use third party website analytics tools (such as Google Analytics) that employ cookies to collect certain information that cannot be used for personal identification purposes concerning the user's use of our websites, e.g. website address links, page views, and browser types.

Enabling cookies is not strictly required to use the primary functions of the PaySuper digital marketplace, but it will provide you with a better purchasing experience. You may monitor, delete, or disable cookies by changing your browser settings at any time. However, disabling cookies may impair some aspects of the digital store's functionality. For example, you may be unable to quickly select preferred payment methods and email address without cookies.

4. How We Use Information

We may use the information that we collect from you in order to perform our obligations according to the End Users License Agreement (“EULA”) and provide licenses to digital content to you under the terms and conditions of the EULA. The fulfilment of the EULA, this Privacy Policy, and compliance with applicable law constitute a due and valid legal basis for the processing of your personal data for the following purposes:

- to provide licenses and access to digital content purchased from the PaySuper digital marketplace
- to handle your orders and requests, including requests for technical support and assistance
- to properly fulfil tax-related and accounting obligations imposed by applicable laws
- to detect, investigate, and prevent illegal activities or conduct that may violate the EULA

We do not sell, trade, or share your personal data with third parties. However, such information may be transferred to the following third parties:

- payment service providers, but only to the extent required to carry out your requests or orders and process your purchases
- governmental bodies and law enforcement agencies, but only to the extent we are required to share and process such information pursuant to applicable law or court orders
- digital content developers and copyright owners, but only to the extent necessary to grant licenses, provide access to digital content, or handle your requests for technical support
- hosting providers, lessors of server equipment and devices, and security services providers, but only to the extent necessary to securely store information and data on the equipment and on the premises of such service providers without providing access to the information and data.

For the purposes stated above, we may transfer information and data to the countries of the EEA (European Economic Area) or outside the EEA. In each case, we ensure that the level of protection guaranteed by applicable law is not undermined and statutory conditions of transfer laid down in applicable law are complied with.

5. Access, Correction, and Profile Updating

You have the right to obtain a confirmation from us as to whether or not your personal data is being processed. In the event that we process your personal data, you may access such data, as well as the following information:

- the purposes of said processing
- the categories of personal data concerned
- the recipients or categories of recipients to whom your personal data have been or will be disclosed, in particular recipients in other countries or international organizations
- the envisaged period for which the personal data will be stored, or the criteria used to determine this period
- the existence of the right to request the rectification or erasure of your personal data or the restriction of the processing of your personal data from us or to object to such processing

- the right to lodge a complaint with a supervisory authority
- in the event that the personal data was not collected from you, any available information as to its source
- the existence of automated decision-making, including profiling, meaningful information about the logic involved, and the significance and the envisaged consequences of such processing for you

You have the right to correct, rectify, and update inaccurate or incomplete personal data. However, in some cases, in order to prevent unauthorized access to your account, we may request confirmation of the accuracy of the updated data.

6. Retention and Deletion

We store and process your account data until the termination of the contractual relations between you and us under the terms and conditions of the EULA. You reserve the right to delete your account at any time by terminating the contract with the Licensor as envisaged in the EULA.

We may retain the data collected before the termination date of your contractual relations with PaySuper for an additional period in order to be able to respond to the enquiries of financial institutions that processed your transactions, detect and investigate violations of the EULA, enforce remedies available to us under applicable law, and comply with tax-related and bookkeeping obligations.

7. Privacy of Minors

We do not specifically market our websites, games, or services to persons under the age of 18. We do not and will not knowingly collect or process personal data from any person under the age of 18 without the consent of a parent or guardian. Parents or guardians who are concerned about the transfer of personal data from their children may contact us by email or via the support service (see Section 9).

8. Amendments to the Policy

We reserve the right to introduce amendments to this Policy at any time at our own discretion for various reasons, including, without limitation, to reflect changes in applicable law and implement amendments to our website, games, and services. The latest version of this Privacy Policy will always be available on the website.

In the event that significant amendments are made that may limit your rights or impose additional obligations under this Privacy Policy, we will send you prior notice via email (if you provided us with your email address) and publish a new version of this Privacy Policy on the website at least ten days before its effective date.

9. Contact Information

In this Privacy Policy, "we" refers to

PAY.SUPER LTD

Address: 156A Burnt Oak Broadway, Edgware, Middlesex, HA8 0AX, United Kingdom

Company number 11951414

Email: privacy@pay.super.com

In the event that you have any questions regarding this Privacy Policy, you may contact us by e-mail or via the support service. In addition, you reserve the right to lodge a complaint to a supervisory authority.

Date: September 6, 2019