

PRIVACY POLICY

Pursuant to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, the Controller declares that it has implemented all measures to protect the User data, as expressed in this Privacy Policy.

1. DEFINITIONS

1.1. **Controller** – Global Affiliate Network Limited with registered office on Marshall Islands, address: Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Marshall Islands, MH96960, company registration number: 99033.

1.2. **Personal Data** – any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

1.4. **Regulation** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC;

1.5. **User** – a natural person whose data was obtained by the Controller through the Platform;

1.6. Other definitions, not listed above, shall have the customary meaning.

2. CONTROLLER

2.1. Global Affiliate Network Limited seated on Marshall Islands, correspondence address: Global Affiliate Network Ltd, Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Marshall Islands, MH96960, company registration number: 99033, e-mail address: office@global-affiliate.net

2.2. The Controller shall make all efforts to protect the interests of data subjects, and in particular shall ensure that the collected data is:

- 1) processed in line with the law in force;
- 2) collected for specified, legitimate purposes and not subject to further processing incompatible with those purposes;
- 3) factually correct and relevant for the purposes for which it is processed;
- 4) stored in a form that makes it possible to identify data subjects for whom it is no longer necessary to achieve the purpose of the processing.

3. PURPOSE OF DATA COLLECTION

3.1. In connection with the User's use of the Platform, the Controller shall collect data, to the extent necessary to provide services via the Platform, and information about the User's activity on the Platform.

3.2. The User's Personal Data shall be subject to special protection and shall be used only to the extent to which the User has given their consent.

3.3. User data shall be processed by the Controller for the following purposes:

- 1) to process a complaint or inquiry submitted by the User using the Platform;
- 2) to contact the User;
- 3) to assert and defend against claims;
- 4) for data transmission over the network and the proper functioning of the basic functions of the Platform;
- 5) to analyse how Users use the Platform in order to improve performance and enhance the User experience;
- 6) to adapt advertisements to the User's needs and preferences and make content published on the Platform available through external social networks and other external services, including for advertising purposes;
- 7) for analytical and statistical purposes.

4. SCOPE OF DATA PROCESSING

4.1. The Controller may process the following User data::

- a) name and surname;
- b) e-mail address;
- c) mobile phone number;
- d) delivery address (street, house number, flat number, postcode, city, country);
- e) place of residence/business address/registered office address (if different from delivery address);
- f) tax number (for Users who are not consumers)
- g) business name (for Users who are not consumers);
- h) device IP address;;
- i) browser type;
- j) Platform usage and diagnostic information;

	<p>k) search history;</p> <p>l) summary of session;</p> <p>j) location information and other data provided automatically through the web browser.</p>
5.	LEGAL BASIS FOR DATA PROCESSING
5.1.	<p>The following circumstances constitute the legal basis for the processing of User data:</p> <p>a) taking necessary actions before entering into the agreement with the User and during its execution (Article 6(1)(b) of Regulation);</p> <p>b) complying with legal obligations of the Controller, including accounting and tax regulations (Article 6(1)(c) of Regulation);</p> <p>c) legitimate interests: asserting and defending against claims, improvement of the Controller's products and services (Article 6(1)(f) of Regulation);</p>
5.2.	The User may revoke consent at any time by using the e-mail address provided on the Platform. The withdrawal of consent shall not affect the lawfulness of the processing based on consent before its withdrawal.
5.3.	The User shall also have the right to lodge a complaint with the personal data protection supervisory authority.
5.4.	Providing personal data is voluntary, but necessary to submit a complaint or inquiry to the Administrator and receive a response.
6.	AUTOMATED DECISION MAKING
6.1.	The Controller may use profiling on the Platform for direct marketing purposes, but the decisions made by the Controller on the basis of profiling shall not affect entering into or refusal of the Agreement or the ability to use the services of the Platform.
6.2.	The data subject shall have the right not to be subject to a decision when it is based solely on automated processing, including profiling, and produces legal effects concerning the data subject or similarly significantly affects the data subject.
7.	DATA RECIPIENTS
7.1.	<p>When it is necessary for the purposes for which the Controller processes User data, User data may be transferred:</p> <p>a) to entities authorised to receive User data under the law (e.g. law enforcement agencies, supervisory authorities, etc.);</p> <p>b) to entities processing Personal Data on behalf of the Controller, i.e. companies providing the Controller with certain services involving the processing of personal data, e.g. entities operating IT systems or providing ICT tools, entities providing accounting services;</p> <p>c) to external entities acting as parties to the transaction entered into by the User, in particular sellers of products purchased by the User;</p>
8.	DATA RETENTION PERIOD
8.1.	<p>User data shall be stored no longer than necessary to fulfil the purposes for which it was collected, i.e. for:</p> <p>a) the period necessary for the proper performance of the agreements entered into with the User;</p> <p>b) the period necessary to provide the User with all necessary information upon request;</p> <p>c) the period necessary to assert or defend against claims;</p> <p>d) the period during which the Controller is required by law to retain a particular type of documentation;</p> <p>e) until the User withdraws its consent or objects to the processing.</p> <p>The User data shall be deleted by the Controller upon the expiry of all the periods referred to above.</p>
9.	DATA SECURITY
9.1.	The Controller shall store data on the Controller's servers that ensure full data security.
9.2.	The Controller shall conduct a risk analysis on an ongoing basis in order to ensure that Personal Data is processed in a secure manner ensuring that only authorised persons have access to the data and only to the extent necessary for the performance of their tasks. The Controller shall ensure that all operations on Personal Data are recorded and performed only by authorised employees and associates.
10.	TRANSFER OF DATA OUTSIDE THE EEA
10.1.	The Controller informs that personal data are transferred outside the European Economic Area, i.e. to a third country. The Controller has ensured adequate personal data protection safeguards and effective legal protection measures.
11.	COOKIES POLICY
11.1.	This Platform uses cookies for the purpose of the service, in line with this Cookie Policy. The information registered in cookies is used, for example, for advertising and statistical purposes. It also helps customise the Platform to User's individual preferences.
11.2.	Apart from data included in cookies, the Platform collects no other information automatically.

11.3.	<p>Cookies are used for the following purposes:</p> <ul style="list-style-type: none"> a) Adjusting the Platform content to User's individual preferences and optimisation of the use of Platforms. Cookies enable the identification of Platform User's device and the display of the Platform appropriately adapted to User's needs; b) Creating statistics which help understand the way Platform users use Web pages. This helps improve Platform structure and content; c) Maintaining Platform User's session (after logging on). Thanks to this, the User does not need to enter their login and password on each subsite; d) Providing the User with advertising content tailored to their needs.
11.4.	<p>On this Platform the following kinds of cookies are used:</p> <ul style="list-style-type: none"> a) Cookies which enable the use of services available within the Platform; b) Cookies which ensure security; c) Cookies which enable the gathering of information on the way the Platform is used; d) Functional cookies which make it possible to remember settings e) selected by the User, e.g. language, font size, etc.; f) Ad-related cookies which allow for providing users with advertising content customised to their individual interests.
11.5.	<p>If a User uses the Platform without changing browser settings for cookies, they will be saved on User's device. User can change cookies preferences in its browser at any time. These settings can be changed in such a way that either automatic enabling of cookies is blocked in User's browser settings or User is each time informed about cookies being saved on device. Details of the options and ways of using cookies are available in software (browser) settings.</p>
11.6.	<p>Cookies saved on Platform User's end device can then be used by advertisers and partners cooperating with the Platform.</p>
12. FINAL PROVISIONS	
12.1.	<p>If the Platform contains links to other Platforms that are not administered by the Controller, the Controller shall not be liable for the content of those Platforms and the level of privacy protection provided by the controllers of those Platforms.</p>
12.2.	<p>The Controller reserves the right to make amendments or supplements to this Privacy Policy. Amendments to this Privacy Policy shall be effective upon implementation.</p>