

Privacy & Cookie statement

Since day one, Operator of the System has cared about privacy and respecting our users. Protecting the data of our Users is of the highest importance to us, and we go to great lengths to make sure we keep it safe.

We take your trust and right to privacy seriously and work continuously to keep your digital footprint small and in your control. Nevertheless, to enable our Users in your flow and to improve and secure our service, we need to process some personal information. For privacy-related questions, please reach out to our Officer via [e-mail: support@gioconostro.com](mailto:support@gioconostro.com).

This statement covers the processing activities of the Operator of the System services, software, websites (including browser extensions) and/or applications (together: "Services"). The Services allow you to participate in digital game, organized by the Owner of the website. The Services may be provided to you online, in the form of a mobile and/or desktop application(s) and/or may be integrated in a third party service.

Note that System Operator may revise this Privacy & Cookie Statement from time to time. Each revised version shall be dated and posted on the website. System Operator recommends that User review the website from time to time and take note of any changes. If User do not agree with the Privacy & Cookie Statement, such User should not or no longer access or use the website and/or Services. By continuing to use the website and/or Services the User accept any changes made to the Privacy & Cookie Statement.

By using any of the Services you agree to have read and understood our Privacy and Cookie Statement.
User only allowed to use the Service (website, apps and/or Services) when aged 16 and over.

What information collects Operator of the System?

Operator of the System store some personal information, provided by the Users, to make use of our Services possible.

There way in which User may submit personal information: filling in forms at Registration and Personal Account data forms.

Please check the section "What are your rights as a User" to find out how you can change, access or delete your personal information.

Personal information

System retains User's personal information as long as its necessary to provide the Services to the User (e.g. upholding User's account), to conduct our business activities and fulfill our legitimate interests, such as providing safe and secure services, to fix bugs and to reach out to the User, to comply with applicable laws and legal requests and to resolve (legal) disputes.

Personal information you submit

Operator of the System collects, processes or hosts personal information provided by the User.

1. **Contact information:** User's name and User's email address or telephone number.
2. **Information about yourself:** age, gender.
3. **Preferences:** for example language settings.
4. **Personal bank card number:** in order to allow functioning of the System, User provides number of his personal bank card.
5. **Finance transactions:** information about financial transactions, executed through external payment systems, provided by third parties – date, time, status, amount, transaction number.

The User is responsible for the correctness of data and needs to follow our [Terms of Service](#), the System only processes data to provide the Services.

Information we receive from partners

In some cases, System may receive information from third parties, such as: integration information, marketing information, legal information.

Why do we use User's personal information?

System use User's personal information in order to enable functioning of the System and to provide the Services, to comply with legal obligations and to advertise our Services and to keep our Services safe and secure.

Please find below how System use User's personal information specifically.

Activities & purposes

1. **Service:** the most important reason for using User's personal information is, of course, to enable running of software algorithm: to generate logic of the Game, to create and visualize User's current Games, to provide overview of finance transactions and to let you access and use Personal Account.
2. **Support:** we provide needed technical support, on your request, access your Content in order to help you out.
3. **Account & billing:** creating and upholding your personal account for example to facilitate overview of outward and incoming payments across different devices, facilitating payment of User's entry fee and earnings.
4. **Safety, integrity & security:** System follows up on abuse reports, NTD/DMCA reports, fraud investigations and could investigate your compliance with our [Terms of Services](#).
Finally, we could use User's personal information for internal control to safeguard System's safety, integrity and security. For instance, in case of any suspicion of violations of our Terms of Services.
5. **Improvement & development:** System Operator evaluate the use of our Services to improve our Services, fix bugs, develop new products and services. This is being done either by market research or by performing analyses in order to

understand how Users base as a whole interacts with Services, but also to review the effect of our advertisements and to improve those Services and advertisements accordingly.

6. **Marketing, advertisement & communication:** System Operator may use User's personal information for marketing and (interest based) advertising for instance by using SDKs or cookies, as well as communication, personalised advertisements of our partners, which System can serve on our or third party websites. In order to find the right audience for these advertisements certain segments of people may be selected. For instance, people who share the same characteristics or people within a certain geo-location, age gender. In order to connect with our target audience, we might use sequential messaging, on different devices, our Users may use during interaction with our Services through their devices, we might promote one of our (other) Services or features. Finally, we make use of email marketing to send to our Users relevant ads. Where necessary, System will always ask for User's consent before sending you email marketing. Of course, you can always simply opt-out in each email you receive.
7. **Legal:** in so far as necessary, System might use User's personal information to defend Operator of the System in legal proceedings in relation to or as a result of User's use of our Services, following a court order, abiding by any law, regulation or governmental request, cooperating with law enforcement, cooperating in fraud investigations of third parties, safeguarding national security, defense, public security, and to uphold our Terms of Services.

Legal grounds

Each processing activity has a valid legal ground, which is described below.

1. **Contractual obligations with you:** regarding the activities and purposes mentioned under 1, 2 and 3. We need to process personal information to offer our Services through our websites and mobile apps, to provide (technical) support and to bill your entry fee.
2. **Legal obligations:** regarding the activities and purposes under 3, 4 and 7. System Operator is legally obliged to process User's personal information for accounting purposes, to respond to legal requests and NTD- or DMCA-requests.
3. **Consent:** (partially) regarding activities and purposes mentioned under 2 (e.g. accessing your Content for support) and 6, except when System communicate direct marketing in relation to our advertisers.
4. **Legitimate interests:** (partially) regarding activities and purposes under 1 & 3 (e.g. to provide cross device access). For the purposes mentioned under 4 in order to provide safe Services, to prevent fraud and react against illegal use of our Services. For our innovative interests as mentioned under 5. And finally, for our (direct) marketing, brand interests under 6 and legal & compliance interests as stated under 7. When we use User's personal information based on our or a third party's legitimate interest, we will make sure to balance User's rights and freedoms against said legitimate interest. If, to the extent applicable, User wish to object to the activities based on our legitimate interest and there's no opt-out available in User's account settings or received communication, please contact support@gioconostro.com

What parties may share User's information?

System may have several partners to operate and to improve its Services. Furthermore, System has to share User's information as part of some of the Services.

1. **Service providers:** such as System's hosting provider, support provider, IT & software providers, payment processors, email processors and the accountant.
2. **People and (social) media of your choice:** User may choose to share some data with others, such as teammates, within our Services or on (social) media like Twitter, Facebook, etc.
3. **Law enforcement agencies or regulators:** System Operator is obliged to share User's personal information in case of a legal request.
4. **Business partners:** System Operator collaborate with advertising partners, marketing and communication agencies. Thus, is done for (interest based) advertising, branding and reaching out to User. System Operator's advertising partners may implement their own tracking cookies which fall under their terms of services and privacy & cookie statement. Please refer to such third party cookies and their privacy policies.
5. **Integrated services:** System has to integrate external payment services, provided by third parties. In order to provide such service, System need to share some of User's personal information with that service. The terms and privacy & cookie statement of these third parties applies, at least for their part of the connection.
6. **System entities:** System Operator may share personal information between entities which are part of the System in order to provide our Services and for all purposes mentioned under "Why do we use your personal information?".

System is a global business, which means we might share or store personal information in countries outside of the European Economic Area ("EEA"). Those countries have different data protection laws in place. However, when System Operator transfer- and host data globally, System Operator will make sure that appropriate safeguards are in place in order to ensure User's personal information enjoys a similar level of protection as it would within the EEA.

How safe is to use the Services?

System Operator takes technical and organisational measures to protect User's personal information against loss or other forms of unlawful processing.

System Operator make sure that personal information is only accessible by those who need access to do their job and that they are properly authorised. That means System Operator limits the amount of people that have access and make sure that personal information can only be read, copied, modified or removed by properly authorised staff. We monitor internal activity to ensure the safety and accuracy of personal information.

System Operator staff is required to conduct themselves in a manner ensuring confidentiality, ethics, and appropriate usage of personal information.

During an upload, while it's stored on System's servers and during a download, Content is encrypted and only sent over a secure connection (https). The servers we use to store your Content for you are GDPR compliant and secure.

What are your rights as a User?

When User is contacting System Operator's team - we may ask for proof of identity.

User has options to:

1. Provide correct personal information (Minimum required information in order to register in the System);
2. Provide additional personal information (fill in additional fields on Personal Account data page);
3. In certain cases, send User's personal information to other third parties;
4. Request System to delete provided personal information (Note: upon request of the User, User's Account can be deleted only after finish of all currently open games).

User may realise these rights through interaction with the System on-line or through apps, or send request by e-mail: support@gioconostro.com Please state clearly in the subject that User's request concerns a privacy matter and more specific whether it is a request to access, correction or deletion. Bear in mind that under circumstances System Operator may request for additional information to determine User's identity.