# **Privacy Policy**

Last updated: April 2018

## 1. Introduction

Thank you for visiting the <a href="http://www.adoplayer.com">http://www.adoplayer.com</a> website (the "Website"). Your privacy and the integrity of any information you provide are important to us at Adoplayer Ltd. ("Company; We"), the operator of this Website.

We are accountable for our Privacy Policy and the practices on our Website, including the Privacy Policy as set out below. If you have any questions or concerns regarding this Privacy Policy, please address them via e-mail to us via our "Contact Us" page.

This Website may be connected by "hyperlinks" to other third party sites. We are not responsible in any way for the privacy practices on other third party's sites and suggest that you review the privacy policies on those linked sites before using them.

Any information stored on our Website is treated as confidential. All information is stored securely and is accessed by authorized personnel only. The Company implements and maintains appropriate technical, security and organizational measures to protect Personal Data against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

# 2. Collection and use

### 2.1 .General

The following sections cover the specifics of each of the three groups from which Personal Data is collected: Website Visitors, Users and Partners. For the purposes of this Policy Personal Data shall mean and may comprise: IP address, first and last name, postal and email address, telephone number, data from social networks, areas of interest, interest in products, as well as information as to the type of relationship that exists between the Company and Visitors, Users and/or Partners.

## 2.2 Website Visitors and Users

By visiting the Website, you consent to the collection and use of your Personal Data as described herein. If you do not agree with the terms set out herein, please do not visit this Website. If required by applicable law, Company will seek your explicit consent to process Personal Data collected on this Website or volunteered by you. Kindly note that any consent will be entirely voluntary. However, if you do not grant the requested consent to the processing of your Personal Data, the use of this Website may not be possible. We may collect, record and analyze information of Visitors to this Website. We may record your IP address and use cookies (see: Cookies Policy below). We may add information collected by way of page view activity. Furthermore, Company may collect and process any Personal Data that you volunteer to us in our website's forms, such as when you subscribe or sign up for information and newsletters. If you provide Company with your social media details, the Company may retrieve publicly available information about you from social media. The Company gathers data about visits to the website, including numbers of Visitors and visits, Geo-location data, length of time spent on the site, pages clicked on or where Visitors have come.

### 2.2.1 Purpose of processing personal data

The Company uses the collected data to communicate with Visitors, Users and/or Partners, to customize content for Visitors, Users and/or Partners, to show ads on other websites and to improve its Website by analyzing how Visitors and/or Users navigate its Website.

## 2.2.2 Sharing personal data

The Company may also share such information with service vendors, Partners and/or contractors in order to provide a requested service or transaction or in order to analyze the Visitor and/or Users behavior on its Website.

#### 2.2.3 Cookies

The Website and some of our services use cookies (small text files containing a string of alphanumeric characters that we put on your computer) and other similar tracking technologies (like web beacons, tags and scripts) to uniquely identify Visitors' and/or Users' browser and to gather information about how Visitor and/or User interact with the Websites and services. We use this information for the following purposes: Assisting Visitor and/or User in navigation; Assisting in registration, login and the ability to provide feedback; Analyzing the use of products, services or applications; and assisting with promotional and marketing efforts (including behavioral advertising).

Please see the Company's <u>Cookie Policy</u> for more information about the type of cookies and tracking technologies that we use on this Website and why, and how to accept or reject them.

We also utilize Google Analytics, a web analysis service provided by Google, to better understand your use of our Website and services. Google Analytics collects information such as how often Users visit the Website, what pages they visit and what other sites they used prior to visiting. Google uses the data collected to track and examine the use of the Website, to prepare reports on its activities and share them with other Google services. Google may use the data collected on the Website to contextualize and personalize the ads of its own advertising network. Google's ability to use and share information collected by Google Analytics about your visits to the Website is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. Google offers an opt-out mechanism for the web available here.

### 2.2.4 Links to other sites

Please be aware that while visiting the Website, Visitors and/or Users can follow links to other sites that are beyond the Company's control of influence. The Company is not responsible for the content or privacy policy of these other sites.

#### 2.3 Users

#### 2.3.1. General

In order to provide services to its Users, the Company collects certain types of data from them. This section will describe how these two types of data are collected and used by the Company as well as geographical differences that effect this policy.

## 2.3.2 Collection of User data

During a User's registration and later on the Company's Website, it provides information such as name, email, address, telephone, credit-card number and other relevant data. This information is used by the Company to identify the User and provide them with support, services, mailings, sales and marketing actions, billing and to meet contractual obligations.

The Company's Users can at any time access and edit, update or delete their contact details by logging in with their username and password. The Company will not retain User's data longer than it is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations.

## 2.3.3 Collection and Processing of Personal Data

The Company relies on the consent of the individual to process Personal Data (for example, when the user inputs personal information into the Website). On other occasions, the Company may process Personal Data when it needs to do this to fulfill a contract or where it is required to do so by law.

The Company may also process Personal Data when it is in its or its Partners' legitimate interests to do so and when these interests are not overridden by the individual's data protection rights (which may vary based on an individual's jurisdiction).

# 2.3.4. Geographical location

The Company offers a number of data regions. A "Data Region" is a set of data centers located within a defined geographical area where Visitor and/or User data is stored. Personal Data is not transmitted between Data Regions. For Visitor and/or User with accounts located in European Data Region, all Personal Data is processed in the EEA. For Visitor and/or User with accounts in the Data Regions: United States of America (US), all Personal Data is processed solely in the respective country.

## 2.3.5. Processing in the European Economic Area (EEA)

For Visitor and/or User with accounts located in European Data Region, all processing of Personal Data is performed in accordance with privacy rights and regulations following the EU Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 (the Directive), and the implementations of the Directive in local legislation. From May 25th, 2018, the Directive and local legislation based on the Directive will be replaced by the Regulations (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, known as the General Data Protection Regulation (GDPR), and the Company's processing will take place in accordance with the GDPR.

#### 2.3.6. Controller/Processor

The Company processes Personal Data both as a Processor and as a Controller, as defined in the Directive and the GDPR:

The Company, which you as a Partner entered an agreement with, will be the Processor for User data provided by the Company to Partner and the Partner will be the Controller in accordance with Directive and GDPR.

For User data, provided by the User to Company, the Company will be the Controller in accordance with Directive and GDPR. The Company adheres to the Directive of 1995 and the GDPR from May 25th, 2018.

All data collected by the Company will be stored exclusively in secure hosting facilities provided by Amazon Web Services Inc. All hosting is performed in accordance with the highest security regulations. The Company contract with its hosting provider ensures that all hosting is performed in accordance with the highest security regulations.

The Company has adopted reasonable physical, technical and organizational safeguards against accidental, unauthorized or unlawful destruction, loss, alteration, disclosure, access, use or processing of the User's data and/or the Personal Data in its possession. The Company will promptly notify you in the event of any known unauthorized access to, or use of, the User's data and/or the Personal Data. Please

note however that where you are transmitting information over the internet, this can never be guaranteed to be 100% secure.

## 3. Retention and deletion

The Company will not retain data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations. For User data, Users with an active account will therefore have the responsibility to delete data when required. When a user's account is terminated or expired, all Personal Data collected through the platform will be deleted, as required by applicable law.

# 4. Acceptance of these Conditions

We assume that all Visitors and/or Users and/or Partners have carefully read this document and agree to its contents. If someone does not agree with this Privacy Policy, it should refrain from using the Website and/or the services. We reserve the right to change this Privacy Policy as necessity. We encourage Visitors and/or Users to frequently check this page for any changes. You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically and become aware of modifications. Continued use of the Website and/or the services after any changes to these conditions implies acceptance of the revised Privacy Policy.

# 5. Our Legal Obligation to Disclose Personal Data

We will reveal a Visitor and/or User's Personal Data without his/her prior permission only when we have reason to believe that the disclosure of this information is required to establish the identity of, to contact or to initiate legal proceedings against a person or persons who are suspected of infringing rights or property of the Company or to others who could be harmed by the user's activities or of persons who could (deliberately or otherwise) transgress upon these rights and property. We are permitted to disclose Personal Data when we have good reason to believe that this is legally required.

# 6. Children's Information

The Website is not directed or intended for children under 13 years of age. We do not knowingly collect or solicit information from individuals under 13 years of age. If we later obtain actual knowledge that an end user is under 13 years of age, we will take steps to remove that end user's information from our systems. Children should always get permission from their parents before sending information about themselves (such as their names, email addresses, and phone numbers) over the internet. We are in compliance with the requirements of COPPA (Children Online Privacy Protection Act), and do not collect any information from anyone under 18 years of age. We will not knowingly encourage any minor to register with the Website or to access those features which require registration.

# 7. Data Protection Officer

The Company has a "Data Protection Officer" who is responsible for matters relating to privacy and data protection. This Data Protection Officer can be reached at the following address: dataprotectionofficer@adoplayer.com.

### 8. Further Information

If you have any further questions regarding the data collects, or how we use it, please contact us by email at: Support@adoplayer.com.