

Privacy Policy

This privacy policy has been compiled to better serve those who are concerned with how their 'Personally identifiable information' (PII) is being used online. PII, as used in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website.

This Privacy Policy describes the ways we collect, store, use and manage the information you provide to us or we collect in connection with your use of BluePear website accessible at <https://bluepear.net> and our other websites on which this Policy appears (the 'Website'), and when you apply for or participates in BluePear advertising program for publishers (the 'Program').

When we refer to 'we' (or 'our' or 'us') that means Blue Pear Marketing LTD, a UK company whose company registered office is 7 Bell Yard, London, England, WC2A 2JR

When we refer to 'you' (or 'your') that means visitors to our website, program, subscribers to any service we offer through our website, prospective or existing clients corresponding with us by phone, e-mails or otherwise.

When talking about 'Personal Data' we mean identifiable information about you, like your email address, username, messenger IDs, payment details and so on. If you can't be identified (for example, when Personal Data has been aggregated and anonymized), then this Policy does not apply.

Please read this Privacy Policy carefully and make sure you fully understand and agree with it, before you access or use any of our services. If you do not understand or agree to this Privacy Policy, you must leave this website or service.

If there are any questions regarding this Privacy Policy, you may contact us using the information below:

BLUE PEAR MARKETING LTD

Add: 7 Bell Yard, London, England, WC2A 2JR

Contact email: info@bluepear.co

We are in compliance with the requirements of the Children's Online Privacy Protection Act. We will not intentionally collect any information from anyone under 16 years of age. Our website, programs are all directed at people at least 16 years old or older.

BY SUBMITTING YOUR INFORMATION TO US AND USING THIS WEBSITE AND/OR PROGRAM YOU AGREE TO THIS PRIVACY POLICY AND PROCESSING OF YOUR PERSONAL DATA IN THE MANNER PROVIDED IN THIS POLICY.

What Data We Collect and How We Do That

When you visit our Website or use our Program we collect and process your Personal Data. The ways we collect it can be broadly categorized into the following:

Information you provide to us directly

When you visit or use some parts of our Website and/or Program we might ask you to provide Personal Data to us. For example, we ask for your contact information upon registration or when you contact us with questions or request support, or we ask certain documents during verification check.

Information we collect automatically

We collect some information about you automatically when you visit our Website or use our Program, like your IP address, the type of device you use, ID or serial numbers of your device, browser type, version and language, type and version of your operating system, and the number and frequency of visitors to the Website. This information is useful for us as it helps us get a better understanding of how you are using our Website and Program so that we can continue to provide the best experience possible.

Some of this information is collected using cookies, similar tracking technologies and third-party tools like Google Analytics.

We use Google Analytics to collect information about use of the Website and Program. Google Analytics collects information such as how often users visit the Website, what pages they visit when they do so, and what other sites they used prior to coming to the Website. We use the information we get from Google Analytics only to improve the Website and Program. Google Analytics collects only the IP address assigned to you on the date you visit the Website, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with your Personal Data. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit the Website, the cookie cannot be used by anyone but Google. 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 Service and the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits to the Website by disabling cookies on your browser.

We utilize Facebook and VK.com pixel services. These tools allow us to follow the actions of visitors after they are redirected to the Website by clicking on a Facebook or VK advertisement and reach these visitors again. We are thus able to record the efficacy of our advertisements for statistical and market research purposes services and to advertise to previous visitors to our Website. The collected data remain anonymous and non-personally identifiable. However, the collected data are saved and processed by Facebook and VK.com. Facebook and VK.com are able to connect the data with your Facebook or VK.com account and use the data for their own advertising purposes, in accordance with Facebook's Data Use Policy and VK.com Privacy Policy. In addition, a cookie from Facebook and/or VK.com will be saved onto your device for these purposes.

If you want to find out more about the types of cookies we use, take a look at our cookies policy.

We also collect details of the transactions you carry out with us and your account activity.

Information we get from third parties

Sometimes we might collect Personal Data about you from other sources, such as publicly available materials or trusted third parties like our payment providers. We use this information to supplement the Personal Data we hold about you, in order to better inform, personalize and improve our Program, and to validate the Personal Data you provide.

Legal Grounds to Process Personal Data

Where we collect Personal Data, we will only process it when we have the legal basis for the processing set out in applicable data protection laws such as the EU General Data Protection Regulation (GDPR), the Children's Online Privacy Protection Act, etc. Such legal bases are:

The performance of a contract

We may process your Personal Data where we need to take steps at your request prior to entering into a contract, in particular, during your enrollment in the Program, or where it is necessary for the performance of a contract. For example, when your application is accepted you enter into agreement with us, or when we take steps related to a contract, in particular, facilitation of transactions that take place when you use the Website and/or Program.

A legal obligation

Various laws and regulations impose certain obligations on us. To comply with them we have to process your Personal Data, for example, to comply with advertisement legislation and responsible gaming regulations.

The legitimate interests

Your Personal Data may be processed when we, other companies in our group of companies or third parties have a business or commercial reason to process your Personal Data.

Your consent

In certain limited cases we process your Personal Data based on your consent, for example, when it is required for direct marketing purposes.

How We Use Personal Data

Our processing of your Personal Data is necessary for us to provide you with the Program you have requested. If we do not process your Personal Data, we may be unable to provide you with all features of the Program, and some functions and features on our Website may not be available to you.

We use your Personal Data for a number of purposes, which may include the following:

Use of your Personal Data Legal basis

To operate our Website, ensure our Website and Program work as intended and deliver services you have requested Performance of a contract, Legitimate interest

To set up and operate your account Performance of a contract, Legitimate interest

To determine if you are qualified to participate in the Program, including when we check your identity Performance of a contract, Legitimate interest

To perform legal duties, responsibilities, and obligations; and to comply with any laws and regulations that apply to us and prevent illegal activities Legal obligation

To support you, including assisting with the resolution of technical or payment issues or other issues relating to the Website or Program Performance of a contract

To enhance our Website and Program, test and develop new features and carry out technical analysis of our Website and Program so that we can optimize your user experience and provide you with more efficient tools Legitimate interest

To prevent, detect and report crime, protect you, other users and us, for example, by ensuring network and information security, mitigating security risks, detecting and preventing any fraudulent or malicious activity, and make sure that everyone is using our Website and

Program fairly and in accordance with our Terms and Conditions Legal obligation, Legitimate interest, Performance of a contract

To analyze and aggregate data, to prepare statistics, in particular, to produce aggregated and anonymized analytics and reports, which we may use internally or share publicly or with third parties Legitimate interest

To facilitate, manage and confirm financial transactions Performance of a contract, Legitimate interest

To analyze your fraud risk and verify your credentials using third parties, including financial institutions, identification verification agencies and credit reference agencies Legal obligation, Performance of a contract, Legitimate interest

To monitor your advertising activity and manage our risk in this regard Legitimate interest, Performance of a contract

To exercise our rights set out in our Terms and Conditions or other agreements with you Performance of a contract

To disclose information to companies in our group of companies following a restructure or for internal administrative purposes Legitimate interest

To disclose information to advertisers in case we have received their request or claim concerning any suspicious, fraud and any allegedly illegal activities Legitimate interest

To manage our relationship and communicate with you. This may include:

i. operational communications, like changes to our Website and Program, information about new features, security updates, or assistance with using our Website and Program,

ii. providing you with the information you have requested from us or information we are required to send to you, and

iii. marketing communications

Performance of a contract, Legitimate interest, Your consent

How We Can Share Your Personal Data

There will be times when we need to share your Personal Data with third parties. We will disclose your Personal Data to:

- i. Other companies in our group of companies;
- ii. Third-party service providers and partners who assist us in the provision of Website and Services which you have requested, for example, to those who support delivery of or provide functionality on Website or for Program, or market or promote our Website and Program;
- iii. Regulators, law enforcement agencies, government bodies, courts, fraud prevention agencies, licensing bodies or other third parties, where we think it is necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights (where possible and appropriate, we will notify you of this type of disclosure);
- iv. Advertisers, whose offers you have accepted;
- v. Affiliates and other persons that introduce you to us;
- vi. Identity verification agencies;
- vii. An actual or potential buyer (and its agents and advisers) in connection with an actual or proposed purchase, merger or acquisition of any part of our business; and/or
- viii. Other persons where we have your consent.

International Data Transfers

When we process and share data, it may be transferred to, and processed in, countries other than your country. These countries may have laws different to what you are used to. Where Personal Data are processed in another country, we put safeguards in place to ensure your Personal Data remains protected.

For individuals in the European Economic Area (EEA), this means that your data may be transferred outside of the EEA. Where your Personal Data is transferred outside the EEA, it will be transferred to countries where we have compliant transfer mechanisms in place to protect your Personal Data, in particular, by implementing the European Commission's Standard Contractual Clauses to the contracts with the entities the data is transferred to.

Security

We are committed to protecting your Personal Data and have appropriate technical and organizational measures in place, including:

- i. Data encryption. We encrypt all data that goes between you and us using industry-standard TLS (Transport Layer Security), protecting your personal and financial data. Your data is also encrypted when it is stored on our servers, and encrypted when we transfer it between data centres for backup and replication.
- ii. Limited access. We restrict access to personal information to our employees, contractors, and agents who need that information in order to process it.
- iii. Network protection. Multiple layers of security controls protect access to and within our environment, including firewalls, intrusion protection systems and network segregation. Our security services are configured, monitored and maintained according to industry best practice. We partner with industry-leading security vendors to leverage their expertise and global threat intelligence to protect our systems.
- iv. Secure data centers. Our servers are located within enterprise-grade hosting facilities that employ robust physical security controls to prevent physical access to the servers they house. These controls include 24/7/365 monitoring and surveillance, on-site security staff

and regular ongoing security audits. We maintain geographically separated data replicas to minimize the risk of data loss or outages.

v. Security monitoring. Our security team continuously monitors security systems, event logs, notifications and alerts from all systems to identify and manage threats.

vi. All personnel are subject to full confidentiality. In the event that your data is compromised, we will notify you and competent supervisory authority(ies) within 72 hours

Data Retention

Some data you can delete whenever you like, some data is deleted automatically, and some data we retain for longer periods of time when necessary. When the data is being deleted, we make sure that your data is safely and completely removed from our servers or retained only in anonymized form.

Information retained until you remove it

We offer a range of services that allow you to correct or delete data associated with or stored in your account. For example, you can:

- i. Edit information about yourself (except for your login), or
- ii. Delete your account entirely by contacting our support team.

We will keep this data in your account until it is not closed, and for as such period as specified in the applicable laws to allow us to meet our regulatory and legal obligations and defend ourselves against any claims following the closure of your account (when applicable) or your last contact with us.

Information retained for extended time periods for limited purposes

Sometimes business and legal requirements oblige us to retain certain information, for specific purposes, for an extended period of time. Reasons we might retain some data for longer periods of time include:

i. To protect you, other persons, and us from fraud, abuse, illegal activity and unauthorized access, for example, when suspect someone is committing fraud, is engaged in match-fixing or launders money.

ii. To comply with tax, anti-money laundering and other financial regulations, to carry out accounting or facilitate dispute resolution, for example, when we are party to a financial transaction, including when we make payments to you.

iii. To meet any comply with applicable law, regulation, legal process or enforceable governmental request, or when we are required to enforce our Terms and Conditions, including investigation of potential violations.

iv. To ensure that the Website and/or Program is available to you and other users.

v. If you have directly communicated with us, for example, through a customer support channel or providing feedback or a bug report.

Your Rights

You have the following rights with respect to your Personal Data that we process:

i. Right to access. You have the right to access (and obtain a copy of, if required) your Personal Data.

ii. Right to rectification. You have the right to update your Personal Data or to correct any inaccuracies.

iii. Right to erasure. You may have the right to request that we delete your Personal Data in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.

iv. Right to restriction of processing. You may have the right to request to restrict the use of your Personal Data in certain circumstances, such as when you have objected to our use of your Personal Data but we need to verify whether we have overriding legitimate grounds to use it.

v. Right to data portability. You have the right to transfer your Personal Data to a third party in a structured, commonly used and machine-readable format, in circumstances where the Personal Data is processed with your consent or by automated means.

vi. Right to object. You may have the right to object to the use of your Personal Data in certain circumstances, such as the use of your Personal Data for direct marketing.

vii. Right to complain. If you are not happy with how we are processing your Personal Data, please let us know by sending an email to info@bluepear.co. We will review and investigate your complaint, and try to get back to you within a reasonable time frame. You have the right to complain to your local data protection authority. This right may not be available to you if there is no authority dealing with data protection in your country.

You can exercise your rights at any time by making adjustments in your account or by sending an email to info@bluepear.co

We may require evidence of and be satisfied as to your identity before we take any requested action.

Modifications

We will occasionally update this Private Policy to reflect changes in our practices and services. When we post changes to this Private Policy, we will revise the 'Last Updated' data of this Private Policy. We recommend that you check this page from time to time to inform yourself of any changes in this Private Policy or any of our other policies.

Last Updated Data: November 10, 2021

