

Welcome to our Privacy Policy

At Seven Media Code LTD with registered office at Strovolou, 77, Strovolos Center, Flat / Office 301, Strovolos, 2018, Nicosia, Cyprus (hereinafter, the "Data Owner ") we are committed to respecting your privacy and managing your personal information in a responsible manner. Our privacy policy explains the personal information we collect and how we use this information. It also explains your rights to access, update or otherwise take control of the personal information we hold about you.

The personal information we collect

We collect certain personal information in order to supply our services to you, for example when you request information about products, services or promotions that may be of interest to you. The first type of information we collect is information you voluntarily and knowingly provide, such as your name, address, email address, phone number and any other information you choose to provide to us. The second type of personal information we collect is recorded automatically, through the use of cookies, pixel tags and other similar technologies. This information includes the link that directed you to our webpage, your IP address and geographical location, the types of device, operating system and web browser you are using and the date and time of your visit. This data may be used to improve your browsing experience, but never in a way that would identify it with a user of our system. The "Cookies" section of this policy explains more about how we use these technologies. We do not collect personal information that is recognized as sensitive, such as information concerning health, ethnicity or political opinions and do not knowingly collect the personal information of any person under the age of 18. If we discover, or have reason to believe, we are holding sensitive personal information we will delete that information within a reasonable period. The data collected are stored for a period of 48 months.

Because laws applicable to personal information may vary by country, we may put in place additional measures that vary depending on the applicable legal requirements.

How we use your personal information

We use your personal information in several ways to allow us to supply our services to you, for example if you complete one of our online forms your personal information will be passed electronically to the company affiliated with the advertisement, so that they can respond to your enquiry and provide you with more information on their product or service. We'll only pass your personal information to the company directly affiliated with the specific advertisement you have expressed an interest in and will require them to protect your information in a manner consistent with this policy. We won't sell, lease or otherwise disclose your personal information to any advertisers you haven't directly responded to. We may also use your personal information to send you emails with selected offers, share promotional and information content with you in accordance with your communication preferences, which we feel may be of interest to you. If you decide you no longer want to receive these emails, you can opt out at any time by clicking the "unsubscribe" link available in all these messages. You can also opt out by emailing us at privacy@7gomedia.com with "unsubscribe" in the subject line of your email. Please note that it may take up to 48 hours for your opt-out to take effect and bear in mind that if you enquire about new

products and services you may be opting back in to receive emails from us. We may also use your personal information to promote our offers to you through channels such as Google, Twitter and Facebook. We'll also use your personal information to respond to any comments, requests or questions you may send us or to send you important messages we feel you should be made aware of, such as a significant change to this policy. We may also use your personal information to compile statistics of our marketing campaigns, in order to give us a better understanding of their performance and help us operate and improve our services.

Profiling

The User's personal data (i.e. personal and contact details, and information relating to the services in which the User has expressed an interest) may also be processed by the Data Controller for profiling purposes, i.e. to reconstruct the User's tastes and consumption habits, identifying the User's consumer profile, in order to be able to send the User commercial offers consistent with the identified profile. If consent is not given, the possibility of registering on the Site will not be affected in any way. In the event of consent, the User may revoke it at any time by making a request to the Data Controller sending an email at privacy@7gomedia.com

User ID verification

The Controller informs that, in the pursuit of its legitimate interest, the User's personal data (i.e. personal and contact details) may also be processed by the Controller for security purposes, i.e. to verify the User's digital identity and to prevent fraud and abuse of personal data.

The User may at any time object to this processing by making a request to the Data Controller sending an email at privacy@7gomedia.com

We may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, we do not transfer your Personal Information to the third party.

Sharing of your personal information

In addition to the ways we use your personal information explained above, we may also share your information with trusted third parties. We may share certain personal information with our service providers who help us operate our services, for example with tasks such as database storage, campaign management, technical support and marketing activities. These service providers are only able to use your personal information in ways we have instructed them to and will not share your information with any organization apart from us. We'll only share personal information with these third parties to the extent necessary for them to provide their services to us and require that they maintain security of this information in a manner consistent with this policy. We may also share personal information with companies under the same ownership as us, or with third parties in connection with a reorganization or sale of assets of our business. If the new entity's privacy policy or planned use of your personal information differs materially from ours, we'll offer you the opportunity to opt out of any such transfer. We may also have to disclose your personal information to a third party if we're required to do so by a regulatory body or in order to comply with a legal obligation.

General Data Protection Regulation (GDPR)

The General Data Protection Regulation (GDPR) is a European Union (EU) regulation governing the privacy and security of personal data. The regulation gives users more control over how their data is used and imposes heavy fines for companies who fail to comply or suffer data breaches. This regulation took effect on May 25, 2018.

Seven Media Code LTD with registered office at Strovolou, 77, Strovolos Center, Flat / Office 301, Strovolos, 2018, Nicosia, Cyprus takes every step to keep your data safe including encryption and ensuring our third-party partners are GDPR compliant. As data controllers, we are committed to addressing privacy throughout the development of new products, processes or services, particularly those that involve using and processing personal data.

Consent

At Seven Media Code LTD with registered office at Strovolou, 77, Strovolos Center, Flat / Office 301, Strovolos, 2018, Nicosia, Cyprus we collect, track and manage users consent in compliance with GDPR regulations. We require explicit consent on all forms where we collect personal information; users will see consent checkboxes with details on how we plan to process and use your personal information, particularly on email messages and marketing communications. Users have the right to opt-out of communications at any time.

Our legal basis for processing your personal information

We're required to let you know the legal basis for collecting and using your personal information:

- ways you have consented, for example to allow the company affiliated with the advertisement you have expressed an interest in to respond to your enquiry.
- where it is in our legitimate interests to do so to carry out our usual business activities, for example to send you marketing emails, manage our campaigns and generally operate and improve our services.
- to comply with a legal requirement or to perform a contract.

Although we always take the utmost care to protect your personal information, please be aware that the collection, transmission, and storage of information via the Internet can never be completely secure. If we become aware that any personal information we hold has been compromised, we will notify you by email with details of how it occurred, its nature and the steps we've taken to restore security of the personal data in our care. We'll also disclose any such breaches to the relevant authorities as required by applicable data protection laws. The personal information we hold is stored on secure servers within the European Union, located in France and Ireland, and will be held only for as long as is reasonably necessary to provide our services, for our legitimate business purposes or in order to meet any legal requirements.

Transfers of personal information abroad

In order to deliver our services to you, we sometimes need to share your personal information with parties outside the European Economic Area (EEA), for example if the company affiliated with the advertisement you have expressed an interest in is located outside the EEA. We'll always ensure that

any transfers of this nature are fully compliant with European Union data protection laws governing transfers of personal information outside the EEA, so that your personal information is secure. Some countries outside the EEA have been recognized by The European Union as having appropriate laws and safeguards protecting personal data, known as Adequate Jurisdictions, so that personal information may be freely transferred to them. The current list of these countries is Andorra, Argentina, Canada (commercial organizations), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and the USA (limited to the privacy shield framework). Personal information may also be transferred to countries not recognized as Adequate Jurisdictions, provided we inform you of the absence of appropriate safeguards to personal data in that country and you give your explicit consent to the proposed transfer. If we need to transfer your personal information to one of these countries, we will inform you in a clear, concise and transparent manner and will only make the transfer when you have given us explicit consent to do so.

Your rights regarding your personal information

We aim to be clear and transparent about your rights concerning the personal information we may hold about you. You have the right to:

- be informed about the collection of your personal information and how it is used.
- request a copy of the personal information we may hold about you.
- request that we amend your personal information to ensure it is accurate.
- object to the use of your personal information for a specific purpose, for example for sending you marketing emails.
- request that we delete the personal information we hold about you.
- request that we restrict or suspend the use of your personal information, for example if you are unsure about its accuracy.
- request that we transfer your personal information to you or another party in electronic form.

To exercise any of these rights, please contact us by emailing contact@7gomedia.com

COMMUNICATION OF PERSONAL DATA TO THIRD PARTIES FOR THE PROMOTIONAL, COMMERCIAL AND MARKETING PURPOSES OF THOSE THIRD PARTIES (OPTIONAL CONSENT, BASED ON THE ORDER FORM EXPLICIT DIRECTIONS)

On the basis of consent, personal data may be communicated by the Company to third parties for the promotional, commercial and marketing purposes of these third parties which, from the moment of data transfer, will begin to process your personal data as independent owners. These third parties, who may also reside outside the territory of the European Union, may proceed with the sending of promotional communications on their own initiative or of their partners, by means of e-mails, communications via social networks, telephone contacts. with operator and / or any other means of remote communication possible on the basis of the information provided in filling out the form on the Site. The consent for the use of your personal data for this processing purpose is absolutely optional and your refusal will not prejudice in any way the participation in the Competition. At any time you can decide to revoke the consent previously issued for this purpose without any formalities and without this in any way prejudicing the consent issued for the purposes related to participation in the competition.

“We may share your contact information with our partner WINR Data Pty Ltd. (WINR) and their global partners for the purpose of:

ID Protection - preventing others from misusing your details. This may include ID validation for anti-money laundering, anti-fraud, preventing crime, asset recovery, debt collection and reuniting people with unclaimed assets.

Advertising - providing offers that are relevant to you. This may involve data analysis, matching, profiling and predicting behaviours so you may receive advertising that is more relevant to you.

WINR and their partners will retain your information for as long as necessary to perform these functions. You can opt-out of all WINR activity by contacting their Privacy Officer

<https://www.winrdata.com/privacy-policy>”

Furthermore, the data provided may be processed:

On the basis of an obligation deriving from the applicable legislation or from an order of the Authority;

On the basis of the legitimate interest of the Company, to manage and control our activities internally, process your requests and, where necessary, exercise our rights of action and defense in court.

For a more in-depth examination of the rights that compete with you, see articles 15 and ss. of EU Regulation 2016/679 and art. 7 of Legislative Decree 196/2003.

Use of cookies and other similar technologies

Like most websites, we use cookies, pixel tags and similar technologies to help us get a better understanding of how our webpages are used. A cookie is a small piece of information that is placed on the web-browser of your computer or mobile device when you visit certain webpages. They are commonly used to store personal settings and provide you with a better online experience. Most web browsers automatically accept cookies, but you can choose to decline them in your browser settings if you prefer. However, doing so may restrict the use of certain websites or otherwise affect how they operate. You can learn more about cookies at www.allaboutcookies.org. Pixel tags, also known as web beacons, often work together with cookies and are commonly placed on websites or other online content, but not on your computer. They allow the tracking of certain activities from visitors to webpages, for example to generate records of clicks, purchases or enquiries.

We use cookies and pixel tags to assist us in a variety of ways, including to:

- develop and improve our webpages to provide you with a better user experience.
- recognize you as a unique visitor if you return to one of our webpages.
- provide you with advertisements more relevant to your interests.
- promote advertisements to you through channels such as Google, Twitter, and Facebook.
- monitor the performance of our marketing campaigns, for example to record the numbers of visitors, clicks or enquiries they receive.
- allow our marketing partners and affiliates to compile statistics on the performance of their advertising campaign

Links to other websites

In some cases, our webpages may contain links to other websites. Please bear in mind that these websites are outside our control and are not covered by this policy. The owners of these websites may collect and use your personal information in accordance with their own privacy policies, which may differ from ours, and we recommend that you read their privacy policies carefully.

Changes to this privacy policy

We may modify this policy further from time to time for legal or regulatory reasons, or to improve the operation and user experience of our webpages. Such changes will become effective when the revised policy is published and your continued use of our webpages after this date will be deemed as your acceptance of the updated policy. For this reason, we encourage you to review this policy on a regular basis. If we make a material change to this policy, we'll provide additional notice, for example by sending you an email.

How to contact us

If you have any questions, comments or concerns about this policy, you can contact us by emailing contact@7gomedia.com or by writing to us at the address below. If you receive a marketing communication promoting one of our campaigns, which you believe you have not opted in to receive, please let us know by forwarding the communication to complaint@7gomedia.com

We hereby inform you that your data has not been communicated nor transferred to any entity you haven't consented to.

Notwithstanding the foregoing and given that we want to strictly respect the exercise of your rights, we inform you of the current actions you can perform. You have the right to make a complaint to the Irish Supervisory Authority, The Data Protection Commission (<https://www.dataprotection.ie/>)

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