

Privacy Policy

PRIVACY POLICY

1. This Privacy Policy ("Policy") applies to all information, including personal information within the meaning of applicable law (collectively, "Personal Information") that GAMETTI LTD (Company Number 14348659) ("Lertal") may receive about you through your use of any Lertal websites, programs, products and/or services (collectively, the "Services"), information about which you may find on the Lertal.com sites ("Site") and other Lertal owned sites ("Sites") and in the performance by Lertal of any agreements or contracts entered into with you in connection with your use of the Services.

2. GENERAL PROVISIONS

2.2 Lertal may also receive Personal Information from its affiliates ("Affiliates") whose sites, programs, products or services you use (for example, Lertal's advertisers). In such cases, transfer of Personal Information is only permitted to the extent required by applicable law and is subject to specific agreements between Lertal and each Partner.

2.2 Please note that the use of any of the Sites and/or Services may be subject to additional terms and conditions, which may amend and/or supplement this Policy, and/or have specific terms and conditions relating to personal information posted in the relevant sections of the documents for such Sites and/or Services.

2.3 When processing personal data, Lertal shall be governed by international and EU, Russian, Ukrainian and Georgian law. In particular, this Policy complies with EU Law 2016/679 (GDPR).

2.4 We will notify you if there are any material changes to the Policy. Lertal may also ask for your consent to continue processing personal data, even if you have previously given such consent.

2.5 Lertal welcomes your questions and suggestions regarding the implementation or amendment of this Policy. Please use the email address support@lertal.com to send enquiries about your rights or complaints regarding the incorrectness of your Personal Information or the illegality of the processing thereof.

3. WHAT IS THE PURPOSE OF THIS POLICY

3.1 The protection of your Personal Information and your privacy is extremely important to Lertal. When you use the Sites and Services, Lertal protects and processes your Personal Information in strict compliance with applicable law. In keeping with our duty to protect your Personal Information, in this Policy we would like to inform you in the most transparent way possible of the following:

3.2 Trading Information and Orders.

3.2.1 Any Personal Information you provide to us and/or other users of our Website when you place an order, respond to a message, accept an order, discuss particulars of a transaction and/or undertake other activities in connection with shopping services and Services on our Website. Examples of the data we collect

could be the following including, but not limited to: your account details, information needed to access your personal account, email address.

3.3 Registration and use of forms.

3.3.1 Personal information provided by you during registration (account creation), filling forms (feedback form), contacting support service. For example: your name, IP address, e-mail address, cookies.

3.4 Data and content stored on Lertal systems.

3.4.1 Information about your activity while using the Sites and/or Services. For example, data about your purchases on the Services, data about your use of the Services, information about your interactions with other users, and files and content stored on Lertal systems, including your reviews on third-party sites and/or resources, comments about the quality of our Services and/or Site, and any data we require to successfully handle complaints and arbitration.

3.5 Dispute resolution.

3.5.1 The successful resolution of complaints and the correct operation of our arbitration service is very important to us and our ability to provide you with our services. We may therefore require a certain set of personal details in order to fully deal with your complaints or grievances that may concern you. Lertal reserves the right to release and/or use certain types of personal data as necessary to protect its business and brand reputation.

3.6. Technical Data and Analytics.

3.6.1 For detailed analysis and technical data collection, Lertal uses a set of features (including cookies) that may collect your personal data. Lertal also uses third-party web analytics tools to gather information about traffic sources, website traffic and assess the effectiveness of our Services. For example, we use: the web analytics tool Yandex.Metrika. The types of personal data we collect in this way: date and time of accessing the Sites and/or Services, electronic data (HTTP headers, IP address, cookies, browser ID and software data).

3.7 Sensitive Personal Data.

3.7.1 Lertal does not knowingly collect sensitive personal information (such as racial origin, political views, health information and biometric data) except as required by law.

4. WHO ELSE HAS ACCESS TO YOUR PERSONAL INFORMATION AND TO WHOM IT MAY BE DISCLOSED

4.1. Lertal may share your Personal Information with its employees (to the extent permitted by applicable law). Lertal may also share your Personal Information with its affiliates, including third parties and services with which Lertal cooperates. Please note that the level of protection of Personal Information in some countries may not be the same as in your jurisdiction and by using our Services and/or Site, you consent to such transfers. Third parties include: Yandex.Metrika web analytics tools.

4.2 Lertal may obtain certain data from third parties which may be required by us as a matter of law or to comply with contractual obligations, for example your payment data (payment card mask).

4.3 When processing data obtained in the manner set out in clause. 4.1. Lertal shall be governed by international law and EU, Russian, Ukrainian and Georgian legislation.

5. WHAT IS THE LEGAL BASIS AND PURPOSE FOR PROCESSING YOUR PERSONAL INFORMATION

5.1 In addition to clause 3. of this Policy, Lertal will only process your Personal Information if:

5.1.1. Providing access to your account, including personal account settings and other tools on our Site.

5.1.2 Processing is necessary in order to fulfil Lertal's contractual obligations to you, including the operation of the Sites and Services.

5.1.3 Processing is necessary in order to comply with statutory obligations.

5.1.4 Processing is necessary to improve our services and/or to understand how you interact with our Sites and/or Services.

5.1.5 Where required by applicable law, the Processing is necessary to safeguard Lertal's legitimate interests only if the Processing does not materially affect and is not prejudicial to your interests, rights and freedoms.

5.2 For specific purposes or as required by applicable law, we may seek your separate consent to process your Personal Information. For jurisdictions where consent is recognized as a separate legal basis, your use of the Lertal Sites and/or Services constitutes your consent to such processing. We hereby inform you, and you confirm, that you have no obligation to provide us with any Personal Information when you use the Sites or Services and is based solely on your free will. However, you understand that without providing Personal Information we will not be able to provide you with the Services and your use of the Sites will be restricted.

5.3 Lertal will always process your Personal Information for the purposes set out in clause 5 and only the Personal Information that is relevant to achieving those purposes.

5.4 Occasionally, Lertal may use technical solutions, tools and services of third parties (for example, the services of our payment partner Tome). These solutions, tools and services may process your data for purposes other than those set out in clause 5. of this Policy. Lertal is not responsible for the practices of processing personal data of third parties. Notwithstanding this, we welcome your questions and suggestions regarding the processing of your data by third parties. Please use our email support@lertal.com to contact us.

6. HOW WE USE COOKIES

6.1 Cookies are small pieces of data with certain (often technical) information that a server sends to your device to remember information about your preferences. This information is used by the Site to analyse your activities and to display the Site in a format that is meaningful to you. For example, our Site and other Services use a cookie locale to let you view your preferences in your preferred language (or any language you have chosen).

6.2 Lertal uses session cookies to make it easier for you to use our Services. For example, the PHPSESSID and golden_key cookies are used to remember your choices when you log in to the Services and, for example, when you take a CAPTCHA

test. Session cookies expire at the end of the session (when you close the page or browser window). More on retention times and examples of the use of different cookies

7. WHERE YOUR PERSONAL INFORMATION IS STORED AND PROCESSED

7.1 Your Personal Information will be stored in the EU and/or the EEA.

7.2. for Russian and Belarus users: Lertal records, systematises, accumulates, stores, corrects (updates, changes), extracts personal data of Russian Federation citizens using databases located in the Russian Federation.

7.3 For users from the EEA: Lertal records, systematises, accumulates, stores, clarifies (updates, changes), retrieves personal data of citizens from the EEA using databases located within the EEA.

7.4 If you are located in a territory where your consent is required for the transfer of your Personal Information to another jurisdiction, then by using the Sites or the Services, you are giving Lertal your express and unambiguous consent for such transfer or storage, and/or the processing of information in other specified jurisdictions, including Russia.

7.5 Lertal will also use appropriate measures to ensure that such transfers are in accordance with applicable EU and Russian data protection regulations (when transferring data of Russian citizens).

8. HOW LONG WE STORE YOUR PERSONAL INFORMATION.

8.1. Lertal will retain your data for as long as necessary to achieve the purpose for which it was collected or to comply with legal and regulatory requirements.

8.2 If you wish to have any of your Personal Information deleted, you may request that we do so.

8.3 Once the retention period has expired, your information will be deleted or anonymised.

8.4 If your data has been collected and processed on the basis of your consent to the processing of your Personal Information - we will delete your data without terminating any other, legal relationship if you withdraw your consent. Your withdrawal will not affect your legal status, but may limit the functionality available to you on our Site and/or the functionality of our Services.

9. YOUR RIGHTS

9.1 Where permitted by applicable law, you have a right to access your Personal Information processed by Lertal in accordance with this Policy.

9.2 If you believe that any information Lertal holds about you is incorrect or incomplete, you have the right to request that we supplement or correct your information.

9.3 You also have the right to review the information that Lertal holds about you.

9.4 You may request the deletion of your personal information or part of it or withdraw your consent to the processing of your personal information.

9.5 You may request restrictions on the processing of your Personal Information.

9.6. Request a copy of the Standard Contractual Clauses that permit transfer of your Personal Information to EA, as set out in section 7.5 of this Policy.

9.7. object to processing of your Personal information if required by applicable law.

9.8 You may also have other rights, not specified above, where permitted by applicable law.

9.9 When you use the Services, the transmission of the Personal Information is done with your free consent, expressing your free will and interest (in particular, on the basis of a contract with you), and is not obliged by law.

10. RELATIONSHIP

10.1. Lertal welcomes your questions and suggestions regarding the implementation or amendment of this Policy. Please use the email address support@lertal.com) to make enquiries about your rights or complaints regarding the incorrectness or unlawfulness of the processing of your Personal Information.