

Nomidman Privacy Policy

Last updated: 03/09/2018

1. Who we are?

1.1 Nomidman OÜ (registry code: 14545364; address: Parda 4, 10151 Tallinn) is a private limited company incorporated in Estonia (hereinafter referred to as "Nomidman", "we", "us" or "our" in this Privacy Policy).

2. Welcome to the Privacy Policy ("Privacy Policy").

2.1 Nomidman respects your privacy and is committed to protecting your personal data. This privacy policy is part of an agreement between the customer ("You" or "your") and Nomidman. This Privacy Policy will inform you how your personal data is being used when you visit our website Nomidman.io (regardless of where you visit it from) and/or mobile app and use our services through these (hereinafter "Services") and give information on your privacy rights and how the law protects you.

3. Purpose of this Privacy Policy

3.1 This Privacy Policy aims to give you information on how Nomidman collects and processes your personal data through your use of Services and use of Nomidman's website and mobile app, including any data you may provide through Nomidman website or mobile app when you sign up to our newsletter or alerts, or use any Service that we offer through the website or mobile app.

3.2 This website is not intended for children and we do not knowingly collect data relating to children. By registering, you confirm, that you are over 18 years old and have active legal capacity.

3.3 It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements any other notices and is not intended to override them.

4. Controller

4.1 Nomidman is the controller and responsible for your personal data.

4.2 Our contact details are:

Nomidman OÜ

Data Privacy Officer

Email address: Private@nomidman.io

5. What Information Do We Collect, Why and When?

5.1 We collect personally identifiable information from you when you subscribe to our newsletter, register as a client, respond to a survey or marketing communication, or fill out a form on any of our Websites.

5.2 The data encompasses anything you fill on the forms on the Website (nomidman.io) and consists of the following:

6. Purposes for which we will use your personal data

Purpose/Activity	Type of data	Lawful basis for processing
a) Newsletter b) marketing communications	<ul style="list-style-type: none"> ● name ● email address; 	Consent
Quality of Service, customer support, troubleshooting	<ul style="list-style-type: none"> ● name ● email address; ● website/app usage information 	Performance of a contract with you
(“KYC”) “know your customer” (“AML”) “anti-money laundering” checks	<ul style="list-style-type: none"> ● Proof of Identity (passport, driver's license (valid)) ● Contact details ● Proof of Address (utility bill ● a copy of bank statement (less than 6 months old)); 	(a) Performance of a contract with you (b) Necessary for our legitimate interests (c) Comply with a legal or regulatory obligation

6.1 Additionally, non-personally identifiable information might be collected when you visit Nomidman website or mobile app or use Service as described below.

6.2 If you do not provide all the data, Nomidman might not be able to provide some Services due to legal obligations.

7. How do we use your information?

7.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- a) Where we need to perform the contract we are about to enter into or have entered into with you.
- b) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- c) Where we need to comply with a legal or regulatory obligation.

7.2 We may use the information we collect as described in the previous section in the following ways:

- a) To enhance the security of our website, mobile app and Services and spot potential breaches.
- b) To quickly process your requests or transactions.
- c) To improve our website and mobile app in order to better serve you.
- d) To allow us to better service you in responding to your customer service requests.

- e) To send periodic emails regarding your order or other products and services if you have consented to it.
- f) To follow up with you after correspondence with customer service (email, live chat, or phone inquiries).
- g) To personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested.

8. How long do we process personal data?

8.1 Nomidman processes your personal data up to 6 months from the moment you terminate the usage of Services.

9. How do we protect your information?

9.1 We use hard-to-guess passwords to protect the data from unauthorized access.

9.2 We do regular backups to ensure the data will not be lost.

9.3 For the data, that is store in cloud, cloud provided disaster recovery system is in place.

9.4 We use databases that run on Amazon Virtual Private Cloud (VPC) for the greatest possible network access control and ask our service providers to do the same. The private sub-net connects only to our application server on the VPC and cannot be accessed from external world

9.5 AWS Identity and Access Management (IAM) policies is in use to assign permissions that determine who is allowed to manage RDS resources. AWS IAM enables to manage access to AWS services and resources securely.

9.6 AWS Security groups are used to control the IP addresses or Amazon EC2 instances that can connect to databases.

9.7 Secure Socket Layer (SSL) connections are used to keep the data transfers secure. (AES-256) RDS encryption is used to secure RDS instances and snapshots at rest.

10. Third-parties

10.1 We do not sell or trade or offer any of your personally identifiable information to any third parties. This does not include trusted third parties who assist us in operating our Services, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others rights, property, or safety, or comply with KYC and AML checks.

10.2 We use third party services to comply with our obligations, for example to follow KYC/AML obligation.

10.3 However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

10.4 We do not include or offer third-party products or services on our website or mobile app, although there might by links to third-party websites on our website. These third-party sites have

separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

11. Your rights under the GDPR

11.1 Right of access

11.1.1 The GDPR gives you the right to access information that we held about you. If you want to access that information, please send your request at Private@nomidman.io

11.1.2 Any request for access of your information shall be a subject to providing the acceptable proof of identification. If all complies, you will be provided with the copy of your personal data. If a person's request for information or measures is clearly unjustified or excessive, a reasonable fee may be asked, or the action taken may be refused.

11.2 Right of rectification

11.2.1 You can have your personal data rectified at any time, in case it is inaccurate or incomplete. You should notify us to correct or update your personal data. You can notify us at any time at Private@nomidman.io

11.3 Right of erasure

14.2.1 You can request to delete your personal data at any time by contacting us at Private@nomidman.io. When the personal data is being used to satisfy a legal obligation (such as, for instance, ensuring that a self-excluded player does not participate in any games throughout the relevant period of self-exclusion), Nomidman may be required to retain that data.

14.3 Right to restrict processing

14.3.1 In certain circumstances, you have a right to restrict or block us from processing your personal data.

14.4 Right to withdraw your consent

14.4.1 If the processing is done based on your consent, you have the right to withdraw your consent to processing of your personal data at any time by contacting us at Private@nomidman.io

14.5 Right to data portability

14.5.1 You have a right to request the personal data from us and reuse this data for other services. If Nomidman intends to process your personal data for purposes other than those for which they were originally collected, you will be informed in advance of the purpose of further processing the data in question.

14.6 Right to object

14.6.1 At any given time, you have a right to object to the processing of your personal data

14.7 Right related to automation

14.7.1 You are protected from automated decision-making processes.

15 Governing law, jurisdiction and submitting complaints

15.2 This Privacy Policy and obligations arising from or related to it are governed by the legislation of the Republic of Estonia.

15.3 If you are dissatisfied, you have the right to lodge a complaint with the Data Protection Supervisor the supervisory authority for data protection issues. You can find out how to do this at the Estonian Data Protection Inspectorate (Väike-Ameerika 19, 10129 Tallinn, Estonia , hereinafter AKI) <http://www.aki.ee/en/inspectorate> or European Data Protection Supervisor <https://edps.europa.eu/>. We would, however, appreciate the chance to deal with your concerns before you approach the (AKI) so please contact us in the first instance.

15.4 Any and all disputes arising from or related to the personal data protection will be settled by the parties by way of negotiations. In case the dispute between the parties is to be resolved in judicial proceedings, the parties agree to refer the dispute to Harju County Court in accordance with the legislation in force in the Republic of Estonia.

15.5 The above mentioned does not exclude consumers from their rights regarding jurisdiction.

16 Updates to this Privacy Policy

16.1 Changes to this Privacy Policy will be made when required in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

16.2 You can see when this Privacy Policy was last updated by checking the “last updated” date displayed at the top of this Privacy Policy.

16.3 If you have any questions about changes to this Privacy Policy, please contact us Private@nomidman.io