

PERSONAL DATA PROCESSING POLICY

of GAME PULT TRADING – FZCO

1. DEFINITIONS, TERMS AND ABBREVIATIONS

Term	Abbreviation	Definition
Introduced definitions:		
Client		a natural or legal person with whom and/or in whose favour a civil-law agreement of any kind has been concluded for the use of services (goods, works and services) offered by the Operator to an unlimited circle of persons, or who intends to conclude such an agreement.
Personal Data	PD	any information relating directly or indirectly to an identified or identifiable natural person.
Personal Data authorised by the Data Subject for dissemination	PD authorised for dissemination	personal data to which access by an unlimited circle of persons has been granted by the data subject by providing consent to the processing of personal data authorised for dissemination in the manner prescribed by Legislation.
Biometric Personal Data		information characterising the physiological and biological characteristics of a person on the basis of which his/her identity can be established and which is used by the Operator to establish the identity of the Data Subject.
Special Categories of Personal Data		information concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, health, or intimate life.
Personal Data Operator	Operator	a state authority, municipal authority, legal entity or natural person that independently or jointly with other persons organises and/or carries out the processing of personal data, and also determines the purposes of processing personal data, the composition of personal data to be processed, and the actions (operations) to be performed with Personal Data.
Processing of Personal Data	PD Processing	any action (operation) or set of actions (operations) carried out using automation tools or without the use of such tools with personal data, including collection, recording, systematisation, accumulation, storage, clarification (update, modification), extraction, use, transfer (dissemination, provision, access), depersonalisation, blocking,

		deletion,
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Term	Abbreviation	Definition
		destruction of Personal Data.
Dissemination of Personal Data		actions aimed at disclosing Personal Data to an unspecified circle of persons.
Provision of Personal Data		actions aimed at disclosing Personal Data to a specific person or a specific circle of persons.
Blocking of Personal Data		temporary suspension of the processing of personal data (except where processing is necessary for the clarification of Personal Data).
Destruction of Personal Data		actions as a result of which it becomes impossible to restore the content of Personal Data in the Personal Data information system and/or as a result of which the material carriers of Personal Data are destroyed.
Depersonalisation of Personal Data		actions as a result of which it becomes impossible, without the use of additional information, to determine the attribution of Personal Data to a specific data subject.
Personal Data Information System	PDIS	a set of Personal Data contained in databases and the information technologies and technical means that ensure their processing.
Cross-Border Transfer of Personal Data		the transfer of Personal Data to the territory of a foreign state to a foreign state authority, a foreign natural person or a foreign legal entity.
Legislation		the laws and international treaties of the United Arab Emirates, as well as international treaties, laws, resolutions, orders, decrees, directives, clarifications of administrative and judicial authorities, and judicial decisions in the field of Personal Data having binding (precedential) force, which, by virtue of the legislation of the state of which the Data Subject is a citizen and/or resident, or in which he/she permanently resides, must apply to the Processing of personal data of such Data Subject regardless of the location of the Personal Data Operator or the place of Processing of personal data.
Data Subject	Data Subject	a natural person who is directly or indirectly identified or identifiable by means of personal data.

2. GENERAL PROVISIONS

The activities of the Operator under this Personal Data Processing Policy of GAME PULT TRADING – FZCO (hereinafter referred to as the "Policy") are primarily aimed at ensuring the protection of the

rights and freedoms of Data Subjects during the Processing of PD, including the protection of the right to privacy, personal and family secrets.

The provisions of the Policy apply to all PD processed by the Operator and constitute the basis for organising the work on Processing of PD by the Operator, including the development of other internal regulatory documents governing the process of Processing of PD by the Operator. The Policy extends to PD processed by the Operator that were received both before and after the introduction of this Policy. The procedure for Processing of PD by the Operator is governed by this Policy in accordance with the requirements of Legislation.

This Policy applies to all processes and procedures of the Operator related to the Processing of PD and is mandatory for all employees of the Operator who process PD in the course of their job duties.

In all cases not regulated by this Policy, the Operator shall be guided by the Legislation.

3. PRINCIPLES OF PERSONAL DATA PROCESSING

Processing of PD by the Operator is carried out on the basis of the following principles:

- PD Processing is carried out on a lawful and fair basis;
- PD Processing is limited to the achievement of specific, predetermined and lawful purposes. Processing of PD that is incompatible with the purposes of collecting PD is not permitted, unless otherwise established by Legislation;
- merging of databases containing PD whose Processing is carried out for purposes that are incompatible with each other is not permitted;
- only those PD that meet the purposes of PD Processing are subject to Processing;
- the content and volume of PD being processed must correspond to the stated purposes of PD Processing. The PD being processed must not be excessive in relation to the stated purposes of their processing;
- during PD Processing, the accuracy, sufficiency and, where necessary, relevance of PD in relation to the purposes of PD Processing must be ensured. The Operator takes the necessary measures or ensures they are taken, including measures to destroy or clarify incomplete or inaccurate PD;
- PD are stored in a form that allows identification of the Data Subject for no longer than required by the purposes of PD Processing, unless the PD storage period is established by Legislation, a contract to which the Data Subject is a party, beneficiary or guarantor, or by the consent of the Data Subject to PD Processing;
- PD being processed are subject to destruction or depersonalisation upon achievement of the purposes of PD Processing or in the event that the need to achieve those purposes is lost, unless otherwise provided by Legislation.

4. CONCEPT, COMPOSITION AND CATEGORIES OF PERSONAL DATA

For the purposes of this Policy, Personal Data means any information relating to a Data Subject.

PD constitutes restricted access information (confidential in nature). PD may be processed independently or as part of other confidential information, the processing procedure for which is established by legal norms governing various legal relations, in particular on trade secrets (commercial secrets), on banks (bank secrecy) and others. In such cases, insofar as they relate to PD, such regulations fall within the concept of Legislation adopted in this Policy.

The Operator may, within the scope of its activities, process Special Categories of Personal Data only in cases expressly provided for by Legislation. The Operator may, within the scope of its activities, process Biometric Personal Data for the purposes of establishing the identity of a Data Subject only with his/her written consent, except in cases where Biometric Personal Data are processed without the consent of the Data Subject on the basis of Legislation.

The Operator may, within the scope of its activities, process PD authorised by the Data Subject for dissemination, in the form and manner provided for by the provisions of Legislation, taking into account the prohibitions and restrictions established by the Data Subject.

The Operator processes PD of the following categories of Data Subjects:

- employees of the Operator;
- persons who were previously employees of the Operator;
- close relatives of employees of the Operator;
- employees of existing or potential counterparties of the Operator;
- candidates for vacant positions of the Operator;
- Clients – natural persons;
- users of mobile applications and services;
- natural persons with whom civil-law agreements have been concluded;
- natural persons who have contacted the contact centre;
- visitors to the Operator's office.

5. SOURCES OF PERSONAL DATA

The receipt of PD by the Operator is organised in a manner that does not violate the confidentiality of PD.

PD processed by the Operator may be received both directly from the Data Subject and from other third parties.

When receiving PD directly from the Data Subject, the Operator undertakes to ensure the existence of legal grounds for PD Processing as provided for by Legislation. In cases where the legal basis for PD Processing is the consent of the Data Subject, such consent may be obtained in any form that allows confirmation of the fact of its receipt, however, such consent must meet the requirements of specificity, being informed and conscientious. In cases expressly provided for by Legislation, PD Processing is permitted only with the written consent of the Data Subject, the form and procedure for obtaining which must comply with the requirements of Legislation.

In the event that the Data Subject lacks legal capacity, written consent for PD Processing is obtained from his/her legal representative.

When receiving PD not from the Data Subject, the Operator undertakes, prior to the commencement of PD processing, unless otherwise provided by Legislation, to provide the Data Subject with the following information:

- the name and address of the Operator or its representative;
- the purpose of PD Processing and its legal basis;
- the list of PD being processed;
- the intended users of PD;
- the rights of the Data Subject established by Legislation;

- the source of obtaining PD.

Unless otherwise provided by Legislation, the Operator is relieved of the obligation to notify the Data Subject of the receipt of PD from third parties in the following cases:

- the Data Subject has been notified by the person who instructed the Processing of the Data Subject's PD of the Processing of PD by the Operator;
- PD were received by the Operator on the basis of Legislation or in connection with the performance of an agreement to which the Data Subject is a party, beneficiary or guarantor;
- Processing of PD authorised by the Data Subject for dissemination is carried out in compliance with the prohibitions and conditions provided for by Legislation;
- the Operator processes PD for statistical or other research purposes, provided that the rights and legitimate interests of the Data Subject are not violated;
- notifying the Data Subject would violate the rights and legitimate interests of third parties.

Where expressly provided for by Legislation, when collecting PD, including via the Internet, the recording, systematisation, accumulation, storage, clarification (update, modification), and extraction of PD must be carried out by the Operator using databases located on the territory of the state specified in the Legislation.

6. METHODS OF PERSONAL DATA PROCESSING

PD Processing by the Operator may be carried out both with and without the use of automation tools, including by performing the following actions: collection, recording, systematisation, accumulation, storage, clarification (update, modification), extraction, use, transfer (dissemination, provision, access), depersonalisation, blocking, deletion, destruction.

Automated PD Processing must be carried out in the Operator's PDIS in strict accordance with this Policy.

Automated PD Processing is carried out using computing equipment, both installed locally and integrated into the PDIS.

Access to the PDIS is provided to authorised employees of the Operator solely for the performance of their functions and job duties. During automated PD Processing, personal data is stored on machine-readable PD carriers. Recording PD on a machine-readable carrier is carried out using computing equipment (copying personal data to any removable or non-removable machine-readable carrier, entering PD into a database, etc.).

Non-automated PD Processing must be carried out in such a manner that PD are separated from other information, in particular by recording them on separate material PD carriers, in special sections or in the fields of forms (templates) and by other means.

When conducting non-automated PD Processing involving the use of standard form documents, the nature of the information in which presupposes or permits the inclusion of PD therein (hereinafter referred to as a "standard form"), the following conditions must be met:

- a) the standard form or related documents (instructions for completing it, cards, registers and journals) must contain:
 - information on the purpose of PD Processing carried out without the use of automation tools;
 - details of the Operator (name and address);
 - the last name, first name, patronymic (if any) and address of the Data Subject;

- the source of obtaining PD, the terms of PD Processing;
 - a list of actions with PD that will be performed during the course of PD Processing;
 - a general description of the methods of PD processing used by the Operator;
- b) the standard form must provide a field in which the Data Subject may indicate his/her consent to PD processing carried out without the use of automation tools – where it is necessary to obtain written consent to PD Processing;
- c) the standard form must be drawn up in such a manner that each of the Data Subjects contained in the document has the opportunity to familiarise themselves with their PD contained in the document without violating the rights and legitimate interests of other Data Subjects;
- d) the standard form must exclude the combination of fields intended for entering PD whose processing purposes are manifestly incompatible.

Persons carrying out PD Processing without the use of automation tools (employees of the Operator and other persons carrying out PD Processing on the instruction of the Operator) must be informed of the fact of PD Processing without the use of automation tools, the categories of PD being processed, as well as the specific features and rules for carrying out such PD Processing, established by Legislation and the Operator's regulatory documents.

When storing PD on material carriers (including machine-readable carriers), it is not permitted to store PD whose processing purposes are manifestly incompatible on the same material carrier. Where the purposes of PD Processing recorded on the same material carrier are incompatible, if the material carrier does not permit PD Processing separately from other PD recorded on the same carrier, measures must be taken to ensure separate PD Processing. For the Processing of PD of different categories carried out without the use of automation tools, a separate material carrier must be used for each PD category.

The Operator may make decisions that give rise to legal consequences for the Data Subject or otherwise affect his/her rights and legitimate interests solely on the basis of automated processing of his/her PD only with the written consent of the Data Subject or in cases provided for by Legislation, which also establishes measures to ensure compliance with the rights and legitimate interests of the Data Subject.

Processing of PD for the purpose of promoting services (goods, works, services) in the market through direct contact with a potential consumer by means of communication is permitted only subject to the prior consent of the Data Subject. The Operator is obliged to immediately cease, upon the demand of the Data Subject, PD Processing for the above-mentioned purposes.

7. PURPOSES OF PERSONAL DATA PROCESSING

The Operator, independently or jointly with other persons, organises and/or carries out PD Processing and also determines the purposes of PD Processing, the composition of PD to be processed, and the actions (operations) to be performed with PD.

PD of Data Subjects is processed by the Operator for the following purposes:

- ensuring the labour rights of the Operator's employees and the labour guarantees provided to them, ensuring labour and production processes, including compliance with labour law standards, assisting employees in finding employment, obtaining education and advancing in their careers, ensuring the personal safety of employees, monitoring the quantity and quality of work performed, ensuring the safety of property, and information support;
- personnel selection and consideration of candidates for vacant positions;

- bookkeeping and tax reporting;
- registration and recording of visitors to the Operator's office, and the operation of an access control regime;
- providing service and reference-information support to Clients;
- provision by the Operator of services (goods, works and services) to Clients;
- providing access (including registration) to websites, platforms, marketplaces, and mobile applications;
- conducting advertising and marketing activities and promotions, including those of third parties;
- participation of the Data Subject in testing the Operator's services and products, subject to the consent of the Data Subject or the existence of other legal grounds provided for by Legislation;
- performance of an agreement to which the Data Subject is a party, beneficiary or guarantor, as well as the conclusion of an agreement at the initiative of the Data Subject or an agreement under which the Data Subject will be a beneficiary or guarantor;
- interaction with counterparties and partners in the conduct of procurement activities and contractual work, and in the performance of contracts and agreements;
- carrying out pre-trial and judicial work, including for the purpose of recovering accounts receivable;
- processing of contact centre messages;
- fulfilment and ensuring compliance with the requirements of laws and international treaties applicable to the Operator;
- charitable activities.

8. CONFIDENTIALITY OF PERSONAL DATA

In the course of its activities, the Operator is obliged to ensure the confidentiality of PD being processed. In particular, the Operator undertakes not to disclose PD to third parties and not to disseminate PD without the consent of the Data Subject, unless otherwise provided by Legislation.

9. TRANSFER AND ENTRUSTMENT OF PERSONAL DATA PROCESSING

PD Processing by the Operator may be carried out by:

- employees of the Operator;
- other persons processing PD on the instruction of the Operator.

PD Processing by other persons may be carried out on the basis of a relevant agreement with the Operator containing an instruction for PD Processing with the consent of the Data Subject, unless otherwise provided by Legislation. The instruction must specify the list of actions (operations) with PD that will be performed by the person processing PD, the purposes of PD Processing, establish the obligation of such person to maintain the confidentiality of PD and ensure security during PD Processing, and also indicate the requirements for the protection of PD being processed in accordance with Legislation.

When transferring PD to a third party, the following conditions must be met:

- the transfer (provision of access) of PD to a third party is carried out on the basis of an agreement, an essential condition of which is the obligation of the third party to ensure the confidentiality of PD and security during PD Processing;
- the transfer (provision of access) of PD to a third party is carried out on the basis of Legislation;
- the existence of the consent of the Data Subject to the transfer of his/her PD to a third party, except in cases provided for by Legislation.

The Operator may, in the course of its activities, carry out the Cross-Border Transfer of Personal Data. The Cross-Border Transfer of Personal Data to the territory of any states may be carried out by the Operator in accordance with the conditions and restrictions established by Legislation.

For the purposes of information support, the Operator may create publicly available data sources (including specialised directories, telephone and address books, etc.) containing PD, to which access may be provided to a limited or unlimited circle of persons with the written consent of the Data Subject. Information about the Data Subject may at any time be excluded by the Operator from publicly available or restricted access PD sources at the request of the Data Subject or by a court decision or a decision of authorised state authorities.

10. SPECIFIC FEATURES OF PROCESSING PERSONAL DATA AUTHORISED BY THE DATA SUBJECT FOR DISSEMINATION

The Operator may, in the course of its activities, disseminate Personal Data of Data Subjects only with the relevant consent of the Data Subject and in strict compliance with the requirements of Legislation.

Consent to the Processing of PD authorised by the Data Subject for dissemination must be executed separately. The Operator undertakes to provide the Data Subject with the opportunity to determine the list of PD for each PD category specified in the consent to the Processing of PD authorised by the Data Subject for dissemination.

If the form and content of consent to the Processing of PD authorised by the Data Subject for dissemination must comply with the requirements established by Legislation, the Operator is obliged to ensure such compliance. Silence or inaction of the Data Subject under no circumstances may be deemed to constitute consent to the Processing of PD authorised by the Data Subject for dissemination.

In the consent to the Processing of PD authorised by the Data Subject for dissemination, the Data Subject may establish prohibitions on the transfer (other than the provision of access) of such PD by the Operator to an unlimited circle of persons, as well as prohibitions on the Processing or conditions for the Processing (other than obtaining access) of PD by an unlimited circle of persons.

The Operator undertakes to cease Processing of PD authorised by the Data Subject for dissemination upon receipt of the relevant request from the Data Subject. Such a request must include the last name, first name, patronymic (if any), contact information (telephone number, email address or postal address) of the Data Subject, as well as the list of PD whose processing is to be ceased.

11. RIGHTS AND OBLIGATIONS OF THE DATA SUBJECT

The Data Subject has the right to:

- receive information concerning the Processing of PD in the manner, form and within the time limits established by Legislation;
- demand the clarification of his/her PD, the Blocking of his/her Personal Data or the Destruction of his/her Personal Data if the PD are incomplete, outdated, inaccurate, unlawfully obtained, are not necessary for the stated purpose of PD Processing, or are used for purposes not previously stated when the Data Subject's consent to PD Processing was provided;
- take measures provided for by Legislation to protect his/her rights;
- demand the cessation of PD Processing;
- withdraw his/her consent to PD Processing.

To exercise the right to receive information concerning PD Processing, the Data Subject, or his/her representative, must contact the Operator using the details specified in Section 18 of the Policy with a written request, which must contain:

- the number of the primary identity document of the Data Subject or his/her representative;
- information on the date of issue of the said document and the authority that issued it;
- information confirming the Data Subject's participation in a relationship with the Operator (contract number, date of conclusion of the contract, a conventional verbal designation and/or other information), or information otherwise confirming the fact of PD Processing by the Operator;
- the signature of the Data Subject or his/her representative.

Notwithstanding the foregoing, the Operator reserves the right to continue PD Processing without the consent of the Data Subject if such PD Processing is carried out on the grounds specified in Legislation.

Unless otherwise provided by Legislation, the Operator undertakes to provide the Data Subject, upon his/her request, with the following information:

- confirmation of the fact of PD Processing;
- the legal grounds and purposes of PD Processing;
- the purposes and methods applied for PD Processing;
- the name and location of the Operator;
- information on persons (other than employees of the Operator) who have access to PD or to whom PD may be disclosed on the basis of an agreement with the Operator or on the basis of Legislation;
- PD being processed relating to the relevant Data Subject and the source of their receipt;
- the terms of PD Processing, including the terms of their storage;
- the procedure for the Data Subject to exercise the rights provided for by the Policy and Legislation;
- information on completed or intended Cross-Border Transfer of Personal Data;
- the name or last name, first name, patronymic and address of the person processing PD on the instruction of the Operator, if PD Processing has been or is to be entrusted to such a person;
- other information, the provision of which is provided for by Legislation.

The Data Subject, for the purposes of clarifying and updating his/her PD, is obliged to promptly provide the Operator with information on any changes to his/her PD.

12. TERMS OF PERSONAL DATA PROCESSING (STORAGE)

The procedure for processing (storing) PD by the Operator is determined by the Operator's regulatory documents in accordance with the provisions of Legislation.

The terms of Processing (storage) of PD are determined in accordance with the duration of the agreement with the Data Subject, the term specified in the consent of the Data Subject to PD Processing, and the terms established by Legislation.

PD whose Processing (storage) term has expired must be destroyed, unless otherwise provided by Legislation. Processing (storage) of PD after the expiry of the storage term is permitted only after Depersonalisation of Personal Data.

13. UPDATING, CORRECTION, DELETION AND DESTRUCTION OF PERSONAL DATA. PROCEDURE FOR PROCESSING REQUESTS FROM DATA SUBJECTS

The Operator provides the Data Subject with the opportunity to familiarise themselves with PD processed by the Operator relating to the relevant Data Subject, upon the application of such Data Subject or his/her representative based on the request of the Data Subject or his/her representative.

Upon receipt of a notice from the Data Subject that the PD are incomplete, inaccurate or outdated, the Operator makes the necessary amendments thereto. Upon receipt of a notice from the Data Subject that the PD have been unlawfully obtained or are not necessary for the stated purpose of PD Processing, the Operator destroys such PD. In this case, the Operator undertakes to notify the Data Subject or his/her representative of the amendments made and other measures taken on the basis of the Data Subject's notice, and to take reasonable steps to notify third parties to whom the PD of this Data Subject were transferred, so that they may take the necessary actions with PD.

If unlawful PD Processing is identified upon the application/request of the Data Subject, his/her representative or the authorised state authority for the protection of the rights of Data Subjects, the Operator undertakes, from the moment of such application/request, for the duration of the investigation, to block the unlawfully processed PD relating to this Data Subject, or to ensure the Blocking of Personal Data (if PD Processing is carried out by another person acting on the instruction of the Operator). If inaccurate PD are identified upon the application/request of the Data Subject, his/her representative or the authorised state authority for the protection of the rights of Data Subjects, the Operator undertakes to block, or ensure the blocking of, the Personal Data relating to this Data Subject (if PD Processing is carried out by another person acting on the instruction of the Operator) from the moment of such application/request for the duration of the investigation, if the Blocking of Personal Data does not violate the rights and legitimate interests of the Data Subject or third parties. If the inaccuracy of PD is confirmed, the Operator undertakes, on the basis of information provided by the Data Subject, his/her representative or the authorised state authority for the protection of the rights of Data Subjects, to clarify the PD, or ensure their clarification (if PD Processing is carried out by another person acting on the instruction of the Operator), and to lift the Blocking of Personal Data.

The Operator also ceases PD Processing or ensures the cessation of PD Processing by a person acting on its instruction:

- in the event of the withdrawal by the Data Subject of consent to PD Processing, within a period not exceeding 30 (thirty) days from the date of receipt of such withdrawal, unless another period is established by an agreement or other arrangement with the Data Subject or by Legislation;

- in the event of the achievement of the purpose of PD Processing, within a period not exceeding 30 (thirty) days from the date of achievement of the purpose, unless another period is established by an agreement or other arrangement with the Data Subject, the consent of the Data Subject to PD Processing, or by Legislation;
- in the event that it is not possible to ensure the lawfulness of PD processing, within a period not exceeding 10 (ten) days from the date of identification of the unlawful processing of PD.

In the event that it is not possible to destroy Personal Data within the specified period, the Operator blocks Personal Data or ensures the Blocking of Personal Data if PD Processing is carried out by another person acting on the instruction of the Operator, and ensures the Destruction of Personal Data within a period of no more than six months, unless another period is established by Legislation.

14. **ENSURING THE SECURITY OF PERSONAL DATA DURING THEIR PROCESSING**

When Processing PD, the Operator takes legal, organisational and technical measures to protect PD from unlawful or accidental access thereto, Destruction of Personal Data, modification, Blocking of Personal Data, copying, Provision of Personal Data, Dissemination of Personal Data, as well as from other unlawful actions in relation to PD.

The security of PD is ensured, in particular, by:

- identification of threats to the security of PD during their processing in the PDIS;
- application of organisational and technical measures to ensure the security of PD during their processing in the PDIS, necessary to meet the requirements for PD protection, the fulfilment of which ensures the levels of PD protection established by Legislation;
- application of information protection means that have undergone the conformity assessment procedure in the established manner;
- assessment of the effectiveness of measures taken to ensure the security of PD prior to the commissioning of the PDIS;
- recording of machine-readable PD carriers;
- detection of instances of unauthorised access to PD;
- restoration of PD that have been modified or destroyed as a result of unauthorised access thereto;
- establishment of rules for access to PD processed in the PDIS, as well as ensuring the registration and recording of all actions performed with PD in the PDIS;
- monitoring of the measures taken to ensure the security of PD and the level of PD protection in the PDIS.

The levels of PD protection during their processing in the PDIS by the Operator, and the requirements for PD protection ensuring these levels of protection, are determined depending on the current threats to personal data security, taking into account possible harm to the Data Subject, the volume and content of PD being processed, and the type of activity in the course of which PD are processed, in accordance with the requirements of Legislation and the Operator's agreements with other PD operators and Data Subjects.

Ensuring the security of PD during the Cross-Border Transfer of Personal Data is carried out in accordance with the requirements and recommendations of international legal acts on ensuring the security of PD, international information security standards, and the legislation of the countries in whose territory PD are processed.

The use and storage of Biometric Personal Data outside the PDIS is carried out only using material information carriers and storage technologies that ensure the protection of Biometric Personal Data from unlawful or accidental access, Destruction of Personal Data, modification, Blocking of Personal Data, copying, Provision of Personal Data and Dissemination of Personal Data.

The protection of PD during non-automated processing is carried out in accordance with the requirements of Legislation and the Operator's regulatory documents on working with material information carriers.

15. COOKIES

This section describes the rules for processing cookies and similar technologies when visiting the website gamepult.com (hereinafter in this Section 15 – the "Website"). By using the Website, the Data Subject confirms their consent to the use of cookies in relation to their requests. The consent remains in effect until the Data Subject decides to delete the stored cookies and/or restrict (prohibit) their collection.

Cookies, tags and similar technologies.

A cookie is a small text file that is sent by a web server and stored on a computer, mobile phone or any other device with internet access when visiting the Website or a mobile application.

Each time a page of the Website is opened, the web client (web browser) of the Data Subject sends the specified text file to the web server as part of an HTTP request, in order to provide such a web server with information about the actions or preferences of the Data Subject on the Internet. At the same time, to ensure the security and safety of PD, the web client (web browser) as a rule does not transmit cookies intended for one website or mobile application to other resources.

The Data Subject may both delete already stored cookies at will and restrict (prohibit) their collection by adjusting the relevant settings in their web client (web browser).

For the purposes of this Policy, "cookies" shall hereinafter also mean any other similar technologies. Use of cookies.

The Operator uses cookies for the following purposes:

- ensuring the functioning and security of the Website;
- improving the operation of the Website;
- registering an account on the Website and simplifying the subsequent login procedure;
- collecting information about a user session, generating statistics on the use of the Website (for example, counting visitors to the Website, identifying peak user activity hours), analysing the user experience of interacting with the Website (for example, determining the individual "navigation path" of a user when using the Website), i.e. for optimising the design and structure of the Website in terms of ease of use, quick access to necessary information and general improvement of the user experience;
- improving the Operator's products and/or services and for the development of new products and/or services of the Operator;
- other collected information may be used to generate an "interest list" of the Data Subject, consisting of a random identifier, interest category and timestamp, to display internet content and advertisements to you that match your interests.

Types of cookies used.

Depending on the browser and device used, different sets of cookies are used, including:

- (a) Essential cookies – necessary to ensure the basic functioning of the Website. In particular, they allow users to register and log in to the Website, navigate and view its content, and also allow users to be "recognised" in order to provide the service they have requested (for example, to save previously entered login data for the Website in order to subsequently speed up the login procedure);
- (b) Performance cookies – these cookies collect information about how the user uses the Website (for example, which web client (web browser) they use to visit the Website), which allows us to improve navigation on the Website, make it more convenient and responsive to user needs, as well as to fix technical errors as they arise and ensure the security of the Website. For example, this type of cookie helps us understand how the user accesses, views or uses the Website and identify ways to optimise the Website;
- (c) Targeting cookies – these cookies collect information about the user's search preferences and are used to deliver advertising and content most suited to the user's interests. In addition, they are used to limit the number of times an advertisement is shown, as well as to assess the effectiveness of advertising campaigns (conversion assessment). They remember the user's session visiting the Website and share this information with other organisations, such as advertisers;
- (d) Functional cookies – these cookies help to customise the content of the Website in accordance with the preferences of a particular user. They remember the user's choices (for example, changing text size), the language and the country from which the user visits the Website. The information collected by these cookies is anonymous, and the user's activity on other websites is not tracked;
- (e) Session cookies – these cookies are stored in the web client (web browser) only for the duration of the active session on the Website, i.e. until the Data Subject leaves the Website;
- (f) Persistent cookies – these cookies are stored in the web client (web browser) after the session on the Website is completed, unless the Data Subject deletes them.

Refusing cookies.

The Data Subject may manage the collection of information by cookies by adjusting the relevant settings in their web client (web browser). To obtain instructions on how to block or delete any cookies, the user should go to the "Help" or "Support" section of the web client (web browser). If the cookie function is disabled or blocked, the Operator cannot guarantee the operability of the Website and the full availability of its functionality.

Updates and changes.

Amendments and/or additions may be made to this section of the Policy from time to time. If amendments are made to this section of the Policy, the updated version of the Policy will be posted on the Website, while the Operator will not inform Website users of such amendments by sending them any special notifications. Users are recommended to regularly review this page in order to have up-to-date information. Any amendments to this section of the Policy come into force from the moment of their publication on the Website.

16. NOTIFICATION OF PERSONAL DATA SECURITY INCIDENTS

In the event of identifying a fact of a data breach, unauthorised access, destruction, modification or other unlawful impact on Personal Data (hereinafter – an "Incident"), the Operator takes immediate measures to establish the causes of the Incident and minimise its consequences.

The Operator undertakes to notify the affected Data Subjects of the Incident within the time limits established by Legislation, if such Incident creates a high risk of violation of their rights and legitimate interests.

A Data Subject who has identified signs of a breach of the security of his/her Personal Data has the right to report this to the Operator by sending an email to: info@gamepult.com. The Operator reviews the received report and informs the Data Subject of the measures taken within a reasonable time.

17. LIABILITY FOR VIOLATION OF PERSONAL DATA PROCESSING REGULATIONS

The Operator and/or employees of the Operator found guilty of violating the requirements of Legislation, as well as the provisions of the Policy, shall be held liable as provided for by the legislation applicable to them.

Moral harm caused to a Data Subject as a result of the violation of his/her rights, violation of the rules for PD Processing, as well as the requirements for PD protection, is subject to compensation in accordance with applicable legislation.

18. FINAL PROVISIONS

This Policy is publicly available. The public availability of the Policy is ensured by its publication on the Operator's website at gamepult.com.

This Policy is subject to revision in accordance with the Operator's regulatory documents.

Data Subjects whose PD are processed by the Operator may obtain clarifications on the processing of their PD, as well as exercise their rights and legitimate interests, by submitting a relevant written request to info@gamepult.com.