

## **PROBINEX IKE PRIVACY POLICY**

**PROBINEX IKE** is committed to safeguarding your privacy. In this Privacy & Cookie Policy ("Policy") We explain to you what information we may collect, use, share and store about you, and the choices and rights that are available to you. If you have any questions about this Policy, please contact us using the contact details provided below.

We comply with the relevant Data Protection legislation as set forth by the European Union regarding the collection, use, and retention of Personal Information.

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### **When this Policy Applies**

This Privacy Policy applies to our collection, use and disclosure of your Personal Information in relation to PROBINEX IKE, through our website and content that link or refer to this Policy.

This Privacy Policy does not apply to the practices of third parties that PROBINEX IKE does not own or control.

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### **What is in this Policy?**

Collection & Retention of Personal Information

Use of Personal Information

Sharing Your Personal Information

Your Privacy Rights

Security of Your Personal Information

Children's Privacy

Marketing Preferences

Changes to this Policy

Contacting Us

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### **Collection & Retention of Personal Information**

"Personal Information" is information that identifies you as an individual or relates to an identifiable individual. We may collect Personal Information for the customer such as:

- **General identification and contact information**

Your name, address, date of birth, telephone details and email address;

- **Identification numbers** issued by government bodies or agencies or passport number;

### **We collect information submitted to us through:**

- our online services: We may collect Personal Information when you communicate with us via online chat services, inform us of any special requests or preferences you may have, or sign up for a newsletter or participate in a survey, contest, or promotional offer.
- our offline services: We may collect Personal Information from you offline, such as when receive any of our services, or contact customer service.
- other sources: We may receive your Personal Information from third parties. This may include information from other partners.

We will keep your Personal Information as long as it is necessary, as required by law.

When we destroy Personal Information, we will use safeguards to prevent unauthorized parties from gaining access to the information during the process.

### **What if I do not agree with this Privacy Policy?**

If you do not agree to our processing of your data in the manner outlined in the Policy, please do not submit any Personal Information to us.

### **Use of Personal Information**

Personal Information we collect, will be used only as described below in this Policy.

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**We use this Personal Information as follows:**

- to the extent of our business
  - to send you administrative information, marketing communications, promotional offers, periodic customer satisfaction, market research or quality assurance surveys (to the extent permitted after we have obtained your consent);
  - to allow you to participate in contests and other promotions and to administer these activities;
  - for our business purposes, such as data analysis, audits, security and fraud monitoring and prevention (including using closed-circuit television, and other security systems), enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities;
  - resolve complaints, and handle requests for data access or correction.
  - comply with applicable laws and regulatory obligations (including laws outside your country of residence), such as those relating to anti-money laundering and anti-terrorism;
  - comply with legal process; and respond to requests from public and governmental authorities (including those outside your country of residence); and
  - establish and defend legal rights; protect our operations or those of any of our group companies or business partners, our rights, privacy, safety or property, and/or that of our group companies, you or others; and pursue available remedies or limit our damages.
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**Sharing Your Personal Information**

We may disclose your Personal Information to any affiliate Company for use in accordance with this Privacy Policy. This includes our subsidiaries, affiliates, and our ultimate holding company.

- **Our service providers**

We may disclose Personal Information to our third-party service providers who provide services such as website hosting, payment processing, marketing agencies, auditing and similar third-party vendors and outsourced service providers that assist us in carrying out business activities.

In addition, we may share and disclose Personal Information about you within the following circumstances:

- **Compliance with laws:** We may disclose Personal Information to a third party where we are legally required to do so to respond to or comply with any applicable law, regulation, subpoenas, court orders, legal process, or government requests, including in response to public authorities to meet national security or law enforcement requirements.
- **Vital interests and legal rights:** We may collect and possibly share Personal Information and any other additional information available to us in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms of use, or as otherwise required by law, including without limitation to meet national security or law enforcement requirements. We also may disclose your Personal Information to third parties when we choose to establish or exercise our legal rights or defend against legal claims.
- **With your consent:** We may disclose your Personal Information for other purposes with your consent.

Your Personal Information is never sold, rented or leased to any external company.

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**Your Privacy Rights**

You have certain rights under applicable data protection laws, which include the right:

- (i) to request a copy of your Personal Information,
- (ii) to request access, rectification, or erasure.
- (iii) to restrict the processing of your Personal Information and recall your consent where applicable; and
- (iv) to submit a complaint to the Commissioner's Office for the Protection of Personal Data. In certain circumstances, you may also have the right to object to the processing of your Personal Information. All the above are subject to the

business relationship you have with us and any applicable prevailing legislation.

If you would like to exercise any of the above rights, please immediately notify us in accordance with the “Contact Us” section below so that we may assess your request and determine, under applicable law, whether we are in position to comply with your request.

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### **Security of Your Personal Information**

We are committed to protecting the Personal Information you share with us. We use appropriate physical, technical, organizational and administrative security measures to help protect your Personal Information from unauthorized or unlawful access, use or disclosure, and from accidental loss, destruction or damage.

We support online security using secure server technology because we want your data to be safe. We use state-of-the-art security arrangements and facilities on our Sites and through the PROBINEX IKE Services to maintain data security. Unfortunately, the transmission of information via the internet cannot be guaranteed 100% completely secure and we cannot guarantee the security of your Personal Information that is transferred over the internet.

If you have any reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the “Contact Us” section below.

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### **Children’s Privacy**

PROBINEX IKE, its website or products are not intended for use by children under the age of 14. We do not knowingly collect Personal Information from children under the age of 14. If we learn that we have collected Personal Information from a child under the age of 14, we will delete that data from our systems unless we have the explicit consent from the parent/guardian.

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### **Marketing Preferences & Contacting us**

We will provide you with regular opportunities to tell us your marketing preferences, including in our communications to you. To tell us your marketing preferences and to opt-out, you can contact us using the information in the “Contact Us” section below.

- receiving e-mail messages and text messages from us: If you no longer want to receive marketing-related e-mails or text messages from us on an ongoing basis, you may opt-out of receiving these marketing-related messages by clicking on the link to “unsubscribe” provided in each message or by contacting us.
- receiving telephone communications and postal mail from us: If you no longer want to receive mobile messages, telephone communications or postal mail from us on an ongoing basis, you may opt-out of receiving these marketing-related communications by contacting us.
- our sharing of your Personal Information with our group companies for their marketing purposes: If you would prefer that we do not share your Personal Information on an ongoing basis with our group companies for their own marketing purposes, you may opt-out of this sharing by contacting us at the above addresses.

We aim to comply with your opt-out request(s) within a reasonable time period. Please note that if you opt-out as described above, we will not be able to remove your Personal Information from the databases of third parties with whom we have already shared your Personal Information (i.e., to those to whom we have already provided your Personal Information as of the date on which we respond to your opt-out request). Please also note that if you do opt-out of receiving marketing communications from us, we may still send you other important administrative communications from which you cannot opt-out.

You may contact us on [support@earnio.com](mailto:support@earnio.com). In case you want to exercise any of your rights given to you by law, we reserve the right to verify your identity before communicating with you about your personal data.

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### **Changes to this Policy**

We will update the “Effective Date” at the top of this page to indicate the date from which any changes take effect. We reserve the right to change, modify or amend this Privacy Policy at any time. Any revised Privacy Policy will only apply

prospectively to Personal Information collected or modified after the effective date of the revised policy. Customers & Website visitors are responsible for periodically checking the Privacy Policy posted on the Website for changes.