

**30<sup>th</sup> October 2023**

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### **1. PURPOSE OF THIS NOTICE**

- 1.1. ASBISC ENTERPRISES PLC, is committed to protecting your personal data. This Privacy Notice sets out how we collect and use your personal information when you visit [wp.lorgar.eu](http://wp.lorgar.eu) (the website) or when you use our desktop App version ( the Software, the desktop version) and the choices available to you in relation to the use of your personal information (the Privacy Notice). This Privacy Notice should be read in conjunction with our Website Terms and Conditions.
- 1.2. This Notice is designed to help you understand our privacy practices, including what personal data we collect, why we collect it, what we do with it and how we protect it, as well as your individual rights. It also describes how you may contact us to learn more about our data practices or to exercise your rights.
- 1.3. It is important that any data we collect, and store is accurate. Therefore, if anything changes regarding your personal data during your relationship with us, please keep us informed.
- 1.4. We may change this Notice from time to time, to reflect how we are processing your data, and if we make changes, we will notify you by revising the effective date at the top of this Notice. If we make significant changes that materially affect your privacy rights, we will provide advanced notice and make that clear on the website, or by some other means of contact such as email, so that you are able to review the changes

before you continue using the Services. If you do not agree with the modified Notice, please discontinue the use of the Services or do not consent to the updates.

- 1.5. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

## **2. CONTACT DETAILS**

1 Iapetou, Agios Athanasios, 4101, Limassol, Cyprus

E-mail: [dpo@asbis.com](mailto:dpo@asbis.com)

Phone: 25 857 097/ 25 857 098

## **3. CONTROLLER**

- 3.1. ASBISC ENTERPRISES PLC, a company registered under the legislation of the Republic of Cyprus, with registered number HE 75069, registered address: 1 Iapetou Street, Agios Athanasios, 4101 Limassol, Cyprus, (the “Company”, “ASBIS”, “We”, “Us”), is the Controller and responsible for your personal data.

## **4. PRIVACY NOTICE**

4.1 In making the Website or desktop App version available to you, we act reasonably and believe that:

- (a) you have all necessary rights to register and use this website.
- (b) you are at least 18 years of age or older.
- (c) provide true information about yourself to the extent necessary to use the website's services.
- (d) you understand that by posting your personal information you have apparently made that information public and that information may become available to the Company.
- (e) you understand that certain types of information transmitted by you to other users of the website cannot be deleted by you or the Company.
- (f) you understand and accept the provisions of this Privacy Notice.

4.2. We do not review the user information we receive from you unless such review is necessary for the Company to fulfil its obligations to you.

4.3. This Privacy Notice applies to EU citizens only.

## **5. THIRD PARTY LINKS**

5.1 This website includes links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections allow third parties to collect or share data about you. We do not control these third-party websites and we are not responsible for their privacy

statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

5.2 We are not responsible for the actions of third parties who, as a result of your use of the Internet or the Website Services, gain access to your information in accordance with the level of Internet confidentiality you have chosen.

## 6. THE DATA WE COLLECT

6.1 When using the term “Personal Data” in our Privacy Notice, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. We collect, use, store and transfer different kinds of personal data grouped together as follows:

1. Identity Data	Includes: first name, middle name, last name, nickname, or similar identifiers
2. Contact Data	Includes: Address, country, email address, telephone and/or mobile number, geo - location
3. Gaming setting	Includes: button settings, game device model, date of start of use, keystrokes on the keyboard or mouse, mouse speed and distance run, lighting effects, a combination of buttons, profile photo, your progress to a particular level or stage of the Game, the completion of certain activities during your gameplay, global stat information by games, users' profile data, player items data, achievement rating, list of installed games, chat history, email or messenger correspondence and your order history.

4. Technical Data	Includes: Information about your technical devices, technical interaction with the website (IP address of your host computer operating system, browser type, geographical location, your installed applications, internet provider, your behavior during your browsing and further actions on the website and applications.
5. Marketing and Communications Data	Includes: your preferences in receiving marketing from us, third parties related to us and your communication preferences.
6. Usage Data	Includes: information on how you use our website, products, and services.
7. Aggregated Data	We collect, use, and share Aggregated Data. This kind of data, result from processing personal data for statistical purposes (output data). Aggregated data are derived from your personal data but are not considered personal data as they do not reveal your identity directly or indirectly.
8. Special Category Data	We DO NOT collect any Special Category Personal Data. Meaning details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health, genetic, biometric data. Nor do we collect any information about criminal convictions or offences.

## 7. FAILURE TO PROVIDE PERSONAL DATA

7.1 Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with

goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you in this case.

## 8.HOW IS YOUR PERSONAL DATA COLLECTED

8.1 We collect your data through different methods:

1. Direct interactions	<ul style="list-style-type: none"><li>• When you complete the registration process through Facebook, Google account or arbitrary registration through email.</li><li>• When you use our web version or desktop version and/or use our Services.</li></ul>
2. Automated technologies or interactions	When you interact with our website, we automatically collect Technical Data. We collect this personal data through cookies, and other similar technologies. We also collect your personal data when you visit other websites employing our cookies. Please advise our cookie policy for further details.

## 9.PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

9.1 We collect personal information when you visit our website or Software. Through compliance with this Privacy Notice we commit to respect the privacy of our website visitors and users of our products and services.

9.2 Pursuant to the EU General Data Protection Regulation ("GDPR"), personal information in this Policy is referred to as "personal data" as defined in the GDPR, and in this Policy can be interchangeably used with the term "personal information." For residents of the European Union, "personal data" is any information that, relates to an identified or identifiable individual.

9.3 Personal Information does not include data that has been effectively, irreversibly anonymized or aggregated so that it can no longer enable us or others, whether in combination with other information or otherwise, to identify you.

9.4 We use your personal information to provide you with access to the Website and Software, to provide functionality, analyse performance, correct errors, and improve the usability and effectiveness of the Website and Software.

9.5 We may also ask for your consent to process your personal information for a specific purpose that we communicate to you. Where you consent to the processing of your personal data for a specific purpose, you may withdraw your consent at any time by contacting us, and we will stop processing your data for that purpose.

9.6 We process personal information to comply with laws and/or to prevent and detect fraud and abuse in order to protect the safety of our customers, the Company and others.

9.7 We describe in more detail and in addition to the aforementioned purposes the information we collect when you use our website, why we collect and process it and the following legal bases.

Purpose/ Activity	Type of data	Legal basis for processing
<p>1. We may use this data to provide our Services and improve or fix them where necessary. We may process your personal data in order to make available our Web version/ Desktop version of the Software, or Services to you under the agreed terms and conditions. The processing of these data is also necessary for us to record the progress you made and current status within a Game, Services', forums' and/or products' functionality and good-working condition including but not limited to identifying and correcting any problems or bugs.</p>	<p>Usage data, Technical data, Gaming data, Gaming Setting, Contact data (location)</p>	<p>Legitimate interest  Performance of our contract with you</p>

<p>2.We use these data to respond to your requests or complaints. We also process these data in order to reply to your inquiries and/or support requests through a form of contacting technical support in our desktop or web version software. The processing of personal data shall be necessary in order to identify you and provide you with the proper support/response. We may also process your personal data in order to reply to your complaints.</p>	<p>Gaming setting, Usage data, Technical data, Contact data (location), Identity data.</p>	<p>Legitimate interest Performance of our contract with you</p>
<p>3.We use these data to provide you with the best offers, discounts, rewards, and advertisements. We also process these data in order to determine your activity as a user and to offer you the best offers and/or discounts and/or targeted advertisements in relation to the equipment and/or the participation in testing programs for new gaming devices. We use these data to send push notifications in your personal account in the web and/or PC version and/or to send promotional offers directly to your email</p>	<p>Usage data, Technical data, Marketing and Communication data, Gaming setting, Contact data (location)</p>	<p>Consent</p>

<p>address and messengers. Also, for users who have provided us with their phone number, we may use it in order to message in a built-in chat with support. We may also use this information to reward you to encourage your continued use of the Web and/or PC version and/or Services.</p>		
<p>4. We use these data to determine the duration of use and the level of reliability of our gaming devices. We may process your personal data in order to be able to determine the activity and duration of the use of our gaming devices. We also use these data to determine the level of reliability of our gaming devices, Services.</p>	<p>Usage data, Technical data, Contact data (location), Gaming setting data.</p>	

9.8 Your personal information may also be processed if required by law enforcement or a regulatory authority, body, or agency or for the defence or exercise of legal claims. We will not delete personal information if it is related to an investigation or dispute. They will continue to be stored until these issues are fully resolved and/or during the period required and/or permitted under applicable/relevant law.

9.9 The opt-out option will also be included in any email (as direct marketing) sent to you by us or our selected third-party partners, if the direct marketing is actually carried out by us or our selected third-party partners with our permission.

9.10 Please note that if you do not want us to process sensitive and special categories of data about you (including data related to your health, racial or ethnic origin, political opinions, religious or philosophical beliefs, sex life and sexual orientation) you should not publish this information or share this data on the Website. Once you provide this data, they will be accessible by Company and third-party partners.

9.11 Please note that if you withdraw your consent to processing or do not provide the data we require to maintain and administer the Website and Software, you may not be able to access or register with the Website and Software.

9.12 If we intend to further process your data for any purpose other than those set out in this Privacy Policy, we will provide you with details of that purpose before we start processing.

## **10. DATA SHARING**

10.1 By using VPN services, "Private Tab" mode, Tor Browser, etc. tools, you can specify the confidentiality mode and conditions of access to the information listed for the purposes of clause 9 above. But in this case, we cannot guarantee the quality of the services provided. We take technical and organizational measures to ensure that the appropriate website and application tools are functional. Please be aware that when you post your personal information, it may become available to internet users and may be copied and/or disseminated by those users. Once this data has been transferred from you to other users, you will not be able to delete this data.

10.2. We also share your data with our third-party contractors and application developers, provided that these third parties undertake confidentiality obligations regarding your personal data collected by the Site and your use of the applications they offer.

10.3. The following services are used as an advertising management system: The Google Analytics and Facebook Ads systems are designed so that your information is not shared directly with third-party advertisers. An advertiser or the creator of a suggestion can choose to target ads only to user groups that fall within criteria such as age, gender, or location, or to target communities by type, e.g., cars or fashion. If you belong to one of the target groups, you will receive an advertisement or a recommendation.

10.4. An advertiser or offer maker may also choose to upload a list of emails, phone numbers and website identities to our systems so that we (but not the advisor or offer maker) can check for user matches. They will see the number of matches but not the matches themselves.

## **11. INTERNATIONAL TRANSFERS**

11.1. We may transfer and maintain some of your personal information on our servers or databases outside the European Union.

11.2. Countries to which we transfer your data may not have the same data protection laws as your jurisdiction. We take reasonable cyber security measures and/or apply standard contractual clauses (e.g., Standard Clauses, Data Processing Agreement) to ensure that your data is adequately protected.

11.3. Also please note that we are working with cloud providers whose privacy policies could be found to the following links: AWS: data processing addendum: Privacy Policy: <https://aws.amazon.com/ru/compliance/gdpr-center/> GCP: Data processing addendum: Privacy Policy: <https://cloud.google.com/terms/cloud-privacy-notice> Updates: data processing addendum: Privacy Policy: <https://azure.microsoft.com/enus/overview/trusted-cloud/privacy/>.

## **12. RETENTION PERIOD**

12.1. We will keep your personal data for as long as you continue to be registered as a user in the website version and/or desktop version and/or as long as you use our Services and/or as long as you keep your account activated and/or as long as we have a business relationship with you. After the user submits an application of deletion of his/her profile using the function 'delete my profile' in Web-version or Desktop version of software we shall delete the profile and associated personal data within five (5) business days from such request provided that we are not obliged and/or entitled by any law or regulation to keep such data for a longer period. You have the right to restore your account within 90 days of the deletion. You may restore your account by request to customer support. Regardless of the deletion of your account, we may keep for an unlimited period your personal data for statics and analytics reasons provided that you have not withdrawn the relevant written consent.

12.2. If you no longer wish to be our customer, or cease using or accessing our Services, you can request the deletion of all personal information we store about you, by contacting us.

12.3 If you send us correspondence, including emails, we retain such information electronically in the records of your account. We will also electronically retain customer service correspondence and other correspondence from us to you. We retain these records to measure and improve our customer service and to investigate potential fraud and violations. We may, over time, delete these records as permitted by law.

## **13. YOUR LEGAL RIGHTS**

13.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data.

13.2 **Access.** Request access to your personal data (commonly known as “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

13.3 **Rectification, Portability, and Deletion of your Personal Information.** You have the right to correct or update your personal data, object to the processing of your personal data, ask us to restrict processing of your personal data, or request the portability of your personal data. To protect the privacy and the security of your personal data, we may request data from you to enable us to confirm your identity and your right to access such

data, as well as to search for and provide you with the personal data we maintain upon your request. There are instances where applicable laws or regulatory requirements allow or require from us to refuse to provide or delete some or all the personal information that we maintain.

- 13.4 **Request erasure** of your personal data. This enables you to request the deletion or removal of your personal data when there is no good reason for us to continue processing it. You also have the right to request for deletion or removal of your personal data when you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be communicated to you, if applicable, at the time of your request.
- 13.5 **Object to processing of your personal data when we are relying on a legitimate interest** (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object when we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 13.6 **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to the use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 13.7 **Request the transfer of your personal data to you or to a third party.** We will provide to you, or to a third party of your choice, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- 13.8 **Withdraw consent at any time when we rely on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- 13.9 **Unsubscribe from Our Marketing Communications.** If you no longer wish for us to use your email account to send you marketing emails or non-transactional promotional materials, please directly click on the unsubscribe link at the bottom of any of our email messages to you or contact us.
- 13.10 **Object to the receipt of advertising brochures via traditional mail.** If you no longer wish for us to use your postal address to send you marketing brochures by means of traditional mail, please contact us or (via the return address provided with each advertising brochure), to submit your request to unsubscribe from further postal advertising.
- 13.11 You also have the right to independently remove your profile, the information in your profile, and make changes and corrections to your personal profile on the Website and Application, provided that such changes and corrections contain updated and truthful information. You can also see an overview of the information we hold about you through the website.
- 13.12 **Lodging Complaints.** If you believe we have infringed or violated your privacy rights, please contact us so that we may attempt to resolve any issues to your satisfaction. Notwithstanding the approaches of exercising your rights stated above, this is without prejudice to your right to lodge a claim or complaint to your data protection authority (more details on data protection authorities and their contact info can be found at [https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en)).
- 13.13 If you wish to exercise any of the rights set out above, please Contact us. We will aim to respond to you within 30 days from receipt of request. We will need to verify your identity before we are able to disclose any personal information to you.

## 14. SAFETY MEASURES

- 14.1. We take technical, organizational, and legal measures to ensure that your personal data is protected from unauthorized or accidental access, deletion, modification, blocking, copying and dissemination.