

Cooplay UG hereinafter referred to as “Cooplay” has created this Privacy Policy in line with Cooplay’s commitment to your privacy on Cooplay websites and marketing initiatives. The following discloses Cooplay’s information gathering, dissemination and protection practices.

## **Compliance**

If you do not agree to the terms of this Privacy Policy, please do not access or use Cooplay websites. If you wish to stop receiving Cooplay marketing materials, then please click on the Unsubscribe button within the marketing email you have received from us.

## **Collection of information**

Cooplay collects information to provide better services to its users and to better understand the visitors to its websites and what content is of interest to them. Cooplay collects information in the following ways:

- information you affirmatively choose to submit to us (such as your name, email address, company name, title, country) for the purpose of accessing various downloads, viewing specific content, subscribing to Cooplay newsletters, registering for events and your preferences in receiving marketing from Cooplay and its third party partners and your communication preferences, etc. Information we have obtained about you from publicly available sources such as social media, marketing platforms or on events you attended. You will receive marketing communications from Cooplay if you have requested information from Cooplay or you or your employer has purchased services from Cooplay;
- information Cooplay UG receives from your use of Cooplay websites, such as the IP address, browser type, ISP, referring/exit pages, platform type, date/time stamp, number of clicks, domain name and country/state of all visitors to Cooplay’s websites;

- location information when you use Cooplay's websites, as Cooplay may collect and process information about your location. Cooplay uses various technologies and tools to determine location;
- information that is considered aggregated data such as statistical or demographic data which Cooplay may use for any purpose. Aggregated data may be derived from your personal information but is not considered personal information in law as it does not directly or indirectly reveal your identity, unless Cooplay combines or connects aggregated data with your personal information so that it can directly or indirectly identify you; and
- Cooplay collects technical data from various third parties and public sources as, such as:
  - analytics providers
  - advertising networks
  - search information providers

Other than as required by law, Cooplay websites do not collect any special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Cooplay will not collect any information about criminal convictions and offences.

Cooplay will only use your personal information for the purposes for which it was collected, unless it reasonably considers that it needs to use it for another reason that is compatible with the original purpose. If Cooplay needs to use your personal information for an unrelated purpose, Cooplay will notify you and explain the legal basis which allows Cooplay to do so.

## **Sharing of Information**

Cooplay may disclose your personal information to the following categories of recipients:

- to its **professional advisers, third party services providers and partners** who provide data processing services to Cooplay (for example, to support the delivery of, provide functionality on, or help to enhance the security of Cooplay websites), or who otherwise process personal information for purposes that are described in Privacy Notices or notified to you when Cooplay collects your personal information.
- to any **competent law enforcement body, regulatory, government agency, court or other third party** where Cooplay believes disclosure is necessary (a) as a matter of applicable law or regulation, (b) to exercise, establish or defend its legal rights, or (c) to protect your vital interests or those of any other person.
- to any **other person with your consent** to the disclosure.

## **Legal Basis of Processing**

If your personal information is protected by EU data protection law, Cooplay's legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which Cooplay collects it.

However, Cooplay will normally collect personal information from you only (a) where it needs the personal information to perform a contract with you, (b) where the processing is in its legitimate interests and is not overridden by your rights, or (c) where it has your consent to do so. In some cases, Cooplay may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If you have questions about or need further information concerning the legal basis on which Cooplay collects and uses your personal information, please contact Cooplay via [daria.d@cooplay.app](mailto:daria.d@cooplay.app).

## **Use of Information**

Any information collected by Cooplay will be done in accordance with this Privacy Policy for the purposes of making better business decisions, supporting the activities you choose to engage in, and providing higher quality solutions and services to Cooplay's customers. Cooplay uses your location information to tailor your experience with Cooplay websites. It may also use any non-personal information collected to enhance Cooplay websites, and your IP address for website diagnostics and administration. Cooplay will only retain your personal information for as long as necessary to fulfill the purposes it was collected for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, Cooplay considers the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which Cooplay processes your personal information and whether it can achieve those purposes through other means, and the applicable legal requirements.

## **International Transfers**

Cooplay processes information on servers in many countries around the world and you consent to your personal information being processed on a server located outside the country in which you reside. These countries may have data protection laws that are different to the laws of your country (and, in

some cases, may not be as protective). However, Cooplay has taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy, including, utilizing the European Commission's Standard Contractual Clauses for transfers of personal information between its group companies, which requires all group companies to protect personal information being processed from the European Economic Area to an equivalent standard to that required under European Union data protection law.

## **Information Security**

Cooplay protects your personal information in the same way that it protects its other confidential information, such as storing it on secure servers that only select Cooplay personnel have access to, and by encrypting it to help prevent access by any unauthorized parties. Cooplay has put in place procedures to deal with any personal information breach and will notify you and any applicable regulator of a breach when legally required to do so.

## **Marketing**

As explained above, Cooplay will collect and use your personal data for marketing purposes. Your data will be stored in our CRM system. We will use your data to inform you about Cooplay products and services we think may be of your interest and send you our newsletters. For statistical purposes, we will collect information about your response to our emails and our interaction with you to make decisions on future marketing. If you wish to stop us from collecting and using this information, please contact [\*\*daria.d@cooplay.app\*\*](mailto:daria.d@cooplay.app).

## **Your Data Protection Rights**

If your personal information is protected by EU data protection law, you have the following data protection rights which you may be able to exercise by contacting Cooplay using [daria.d@cooplay.app](mailto:daria.d@cooplay.app):

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting Cooplay.
- In addition, you can **object to processing** of your personal information, ask Cooplay to **restrict processing** of your personal information or **request portability** of your personal information by contacting Cooplay.
- You have the right to **opt-out of marketing communications** that Cooplay sends you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing emails Cooplay sends you or by using the relevant opt-out mechanism for non-email based marketing.
- Similarly, if Cooplay has collected and processes your personal information based on your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing Cooplay conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about Cooplay’s collection and use of your personal information. For more information, please contact your local data protection authority.

Cooplay tries to respond to all legitimate requests within one month. Occasionally, it may take longer if your request is particularly complex or you have made a number of requests. In this case, Cooplay will notify you and keep you updated.

## **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies some parts of Cooplay websites may become inaccessible or not function properly.

## **Changes to the Policy**

Cooplay reserves the right to modify or amend this Privacy Policy at its own discretion from time to time. The changes can be viewed here or elsewhere on Cooplay websites. Your continued use of Cooplay websites constitutes your acceptance of those changes.

This version was last updated on 01 January 2024.

## **Contact Details**

It is important that the personal information Cooplay holds about you is accurate and current. Please keep Cooplay informed if your personal information changes during your relationship with Cooplay. Additionally, if you have any questions about this Privacy Policy, the practices of Cooplay websites or your interaction with Cooplay via Cooplay websites, please contact:

### **Cooplay, UG.**

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