

Privacy Notice

Last updated: 31/10/2023

(see previous versions)

I. Introduction

This Privacy Notice explains how our company (collectively “we”, “us”, “our” or Gamicorp) will collect, compile and disclose information about those who use or contact us via the Website or other communication channels. We put great efforts in making sure that we secure your personally identifiable information and use it properly. This Privacy Notice explains generally how we receive Personal Information about you, and what we do with that Personal Information once we have it.

Please read this Privacy Notice (“Privacy Notice”, “Notice”) in full before using the Website. If you do not agree to this Notice, please do not provide us with your data.

II. Scope of application

This Privacy Notice applies to data processing activities carried out as part of:

- Site management gamicorpgroup.com (“Website”).
- Requests sent through the feedback forms posted on the Website.
- Sending the Gamicorp newsletter.
- Recruitment of employees.
- Interaction with clients, service providers and Gamicorp partners.

III. What do we mean by “Personal Data” and “Processing of your Personal Data”?

For us, **“Personal data”** or **“Personal information”** means information relating to persons who:

- can be identified, or who are identifiable, directly from the information in question; or
- who can be indirectly identified from that information in combination with other information.

“Processing” covers “any operation” performed on personal data “such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

We use different methods to collect personal data about our users and visitors. Usually, you personally provide us with your data by directly interacting with us when you:

- visit our website(s) or services;
- apply for our services;
- create an account;
- make use of any of our services;
- request marketing to be sent to you, for example by subscribing to our newsletters;
- enter a competition, promotion or survey, including through social media channels;
- give us feedback or contact us.

IV. Who we are, and what is our role with respect to your Personal Data?

In this Privacy Notice, any reference to “Gamicorp”, “we”, “us” and “our” means: Gamicorp Development Limited, limited liability company incorporated under laws of Cyprus.

Registration number: HE428396.

Address: Georgiou Gennadiou, 10 AGATHANGELOS COURT, Office 203 3041, Limassol, Cyprus.

Email: info@gamicorpgroup.com

If you have any questions about this Privacy Notice, please contact us via the above-mentioned contact details.

With respect to personal data collected when you access and use the Website or communication channels via Social Media (as Twitter, LinkedIn or Facebook), we may act as a **data controller, joint data controller**, or a **data processor** depending on applicable circumstances as described below.

Data controller means an entity or individual that determines the purposes and means of processing personal data. In other words, the data controller is responsible for deciding why and how personal data is collected, stored, used, and disclosed. The Data controller is also obligated to ensure that the processing of personal data complies with the principles and requirements of the applicable legislation, including obtaining the necessary consent from data subjects and protecting their rights in relation to their personal data.

Joint data controller refers to two or more entities or organizations that jointly determine the purposes and means of processing personal data. In this scenario, they share the responsibility for complying with data protection laws and ensuring the protection of individuals' rights whose personal data is being processed. According to the applicable data protection legislation, which includes the General Data Protection Regulation, also known as the GDPR ("Applicable Legislation"), we may be regarded as joint controllers, for example, in the following case: with respect to your Social Media Data (what is this data outlined below) — when you contact us via Social Media, we are deemed a data controller with respect to (i) the data you provide us with and (ii) the statistical data provided by the respective Social Media. However, with respect to any other processing of your data, the respective Social Media acts as an independent data controller.

Data processor mean an entity or organization that processes personal data on behalf of a Data controller. The Data processor's role is to process Personal data according to the instructions provided by the Data controller. They may include various tasks such as collecting, storing, organizing, analyzing, and deleting Personal data.

V. What are Our principles?

We are committed to maintaining the highest standards of data protection and privacy when processing your Personal data. Our data processing practices are guided by the following principles:

Principles	Description
Lawfulness, Fairness, and Transparency	We process your Personal data lawfully, with a clear and legitimate purpose. We ensure that you are informed about the processing activities through this Privacy Notice and any other relevant communications.
Purpose Limitation	Your Personal data is collected for specified, explicit, and legitimate purposes and will not be further processed in a manner incompatible with those purposes. We do not use your data for purposes that are unrelated to the original intent of collection without obtaining your consent, unless required or permitted by law.
Data Minimization	We only collect and process Personal data that is adequate, relevant, and limited to what is necessary for the purposes for which it is being processed. We do not retain your data longer than required to fulfill the specified purposes, unless retention is necessary for legal or regulatory compliance.
Accuracy	We strive to keep your Personal data accurate, complete, and up-to-date. You have the right to request the correction of any inaccurate or incomplete information.
Integrity and Confidentiality	We implement appropriate technical and organizational measures to ensure the security and confidentiality of your Personal data, protecting it from unauthorized access, disclosure, alteration, or destruction.

Accountability	We take responsibility for our data processing practices and comply with applicable data protection laws and regulations. We maintain records of our processing activities and conduct periodic assessments to ensure compliance.
Lawful Bases for Processing	We process your personal data based on one or more lawful bases, such as your consent, the performance of a contract, compliance with legal obligations, legitimate interests, or other lawful grounds provided by the Applicable legislation.
Data Subject Rights	We respect your rights as a data subject and provide mechanisms for you to exercise those rights.
International Data Transfers Security	If we transfer your Personal data to countries outside the European Economic Area (EEA), we will ensure that adequate safeguards are in place to protect your data, as required by applicable data protection laws.

VI. What Personal Data do we collect and the purpose of processing Personal data?

We will process your personal data only for the purpose of providing to you the services that you ask us to provide you, to satisfy the legal obligations stemming from regulatory obligations that arise from providing you the services and our legitimate interest (clause 6 of the GDPR for individuals who are located in the European Economic Area).

We will use your personal data for the following purposes:

- to manage risk and crime prevention including performing anti-money laundering, counter terrorism, sanction screening, fraud and other background checks, detect, investigate, report and prevent financial crime in broad sense, obey laws and regulations which apply to us and response to complaints and resolving them;
- to process and deliver our services to you, including registering you as a new user, contacting you via email or calls, etc.;
- to manage, process, collect and transfer payments, fees and charges and to ensure good management of our payments, fees and charges;
- to keep our records updated and to study how customers use our products/services;
- to gather market data for studying customers' behavior including their preference, interest and how they use our products/services, determining our marketing campaigns and growing our business
- to administer and protect our website(s) and services in order to provide network security and prevention of the fraud;
- to deliver relevant website content and advertisements to you;
- to improve our website(s) and services; and
- or any purpose that you provide your consent.

Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the purpose of delivering the requested services and improving our services. However, if you choose to limit the use of your personal information, certain features or services may not be available to you.

Category of Data	Examples	Description or Comments
Analytical and Statistical Data	internet protocol (IP) address	<p>When you access and use the Website, certain data may be collected automatically via Google Analytics. More information regarding Google Analytics is available here.</p> <p>After collecting the personal data, Google creates reports about the use of the Platform, which contain the aggregated information where we do not see any data pertaining to a particular person. In other words, we cannot identify you from the other users.</p> <p>Besides, we gather the information by means of placing cookies. Cookies are a feature of the software that allows web servers to recognise the device used to access the Website. A cookie is a small text file that the Website saves on your device when you visit thereof. They allow the Website to remember your actions and preferences over a period of time.</p>
	the type of device used	
	the browser used	
	the device operating system	
	information regarding your use of the Website, for instance, when you clicked a certain button or made some input.	

Contact Data	name/nickname	<p>This data are collected through contact form on the website.</p> <p>You decide at your own discretion what data to provide to us.</p>
	email address	
	phone number	
	any other data requested by us or data that you choose to provide us with	
Subscription Data	email address	<p>If you contact us via contact form on the website, we may use indicated email for our marketing and newsletter purposes.</p>
Social Media Data	nicknames, names, and/or photos	<p>You may contact us via Social Media as Twitter, LinkedIn or Facebook.</p> <p>In general, Social Media makes available the respective statistical information to us in an anonymized form. It is impossible for us to make any conclusions about individual users and access to individual user profiles relying solely on such information.</p> <p>Certain categories of personal data and processing details vary depending on the Social Media, therefore, please refer to the Privacy policies of the respective</p>
	messages, comments, and other communications	
	information provided to us by the respective Social Media as outlined below	
	other data that you choose to provide us with	

		<p>Social Media as listed below.</p> <ul style="list-style-type: none"> - Twitter - LinkedIn - Facebook
Contract Data	full name	<p>If you want us to enter into a contract to provide you with services, you will need to provide some Personal data about yourself. If you are acting independently, this includes, at least, your full name, passport details, and channels of communication. If you are acting on behalf of a company, you will also need to indicate your position in such a company (as example, managing director etc.).</p> <p>Please note that the email as info@company.net is not personal data.</p>
	contact details	
	position in company	
	passport data	
	other data that required by applicable legislation for establishment of contractual relationship or agreement between us	
Recruitment Data	full name	<p>We need this information in order to understand whether you meet the requirements of our vacancy.</p> <p>In the case of employment, the provision of certain information is required by law. We use such data only to the extent and for the purposes</p>
	email address	
	phone number	
	professional experience	

	previous position	necessary to fulfill our legal obligations.
	other information that you provide when applying and/or resume and/or during interviews: photos, skills, educational level, languages spoken, expected salary level, home address, hobby, etc.	
	in case of employment: <ul style="list-style-type: none"> ● Passport Data ● TIN 	
Feedback Data	name	If you are satisfied with the services, or for other reasons decide to tell others your impression of us, you can send us feedback and we will publish it on our Website.
	position	
	photo	

VII. How long do we retain Personal Data?

Category of Data	Period of retention	Explanation
Analytical and Statistical Data	Up to two (2) years. You may find specific	Specific timelines are set by Google in

	timelines here .	its settings.
Contact Data	2 years after the last communication, unless otherwise provided by the relevant legislation	
Subscription Data	As long as you remain a subscriber.	We process such data only until you opt out from receiving our marketing and newsletter emails.
Social Media Data	<p>No retention period for statistical and analytical information.</p> <p>The personal data you provided us with is stored as long as it is not deleted by you or respective Social Media.</p> <p>Information on our communication will be deleted by us after 2 years from the last communication.</p>	<p>We do not establish any retention period for statistical and analytical information, because such information does not allow us to identify any particular individual.</p> <p>We may not be able to erase the personal data you provided us within the communication channels, therefore, such data is processed until either you or respective Social Media deletes it.</p>
Contract Data	In case of contractual relationship between you and us, 2 years after its termination.	This term is related to our fulfillment of our obligations under the law, such as accounting, auditing, taxation, etc.
Recruitment Data	In case of employment: for the period of work in Goten and after dismissal within 1 year. In case of refusal: within 6 months after it, if you do not object to processing.	-
Feedback Data	As long as your feedback remains on our Website.	We process such data only until you opt out by informing us via contact details

		stipulated in the "Contact Us" section.
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VIII. What rights do you have in relation to Personal Data?

According to Applicable Legislation you may have the rights in relation to the personal information we hold about you as outlined below. In order to exercise your rights as a data subject, we may request some additional information from you to verify your identity.

Rights	Description
Right of access	You have the right to request access to the personal data we hold about you. Upon receipt of such a request, we will provide you with information about the purposes of the processing, the categories of personal data being processed, any recipients of the data, and the data retention period.
Right to rectification	If you believe that the personal data we have about you is inaccurate or incomplete, you have the right to request that we rectify or update it promptly.
Right to erasure (Right to be Forgotten)	You can request the deletion of your personal data under certain circumstances, such as when the data is no longer necessary for the purposes for which it was collected, or if you withdraw your consent, and there are no legitimate grounds for continuing the processing.
Right to restrict processing	You have the right to request the restriction of processing your personal data under specific circumstances, for example, if you contest the accuracy of the data or if the processing is unlawful, and you oppose erasure.

Right to data portability	You may request to receive a copy of the personal data you have provided to us in a structured, commonly used, and machine-readable format. You also have the right to transmit this data to another data controller, where technically feasible.
Right to object	You have the right to object to the processing of your personal data based on our legitimate interests. We will cease processing your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms.
Right to withdraw consent	If you have provided consent for the processing of your personal data, you have the right to withdraw your consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.
Right to file a complaint	<p>If you believe that your rights under the Applicable legislation have been violated or that we have not properly addressed your concerns regarding the processing of your personal data, you have the right to file a complaint with the relevant supervisory authority.</p> <p>The supervisory authority is the data protection authority in your country or region responsible for overseeing compliance with data protection laws. You can find the contact details of your supervisory authority on their official website or through other relevant sources.</p> <p>The supervisory authority in Cyprus:</p> <p>Office of the Commissioner for Personal Data Protection Website: https://www.dataprotection.gov.cy</p>

	Address: Kypranoros 15, 1061 Nicosia Postal address: P.O. 23378, 1682 Nicosia Phones: +357 22818456 E-mail: commissioner@dataprotection.gov.cy .
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To exercise any of these rights, or if you have questions or concerns about how we handle your personal data, please contact us using the information provided in the IV section of this Privacy Notice. We will respond to your requests and inquiries without undue delay and in accordance with the requirements of the Applicable legislation. Please note that there may be instances where we cannot fulfill your request due to legal requirements or exemptions provided by the Applicable legislation.

IX. Data Retention

We will keep your personal data for as long as it remains necessary for the identified purpose or as required by law, which may extend beyond the termination of our relationship with you. We may retain certain data as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally-identifiable data, account recovery, or if required by law.

For the purposes of complying with our legal or regulatory obligations and the world industry standards for data storage, you give us consent and permission to keep records of such information throughout the term of existence a Business Relationship with you, as well as for 5 (five) years after the termination of Business Relationship.

X. Could this Privacy Notice be modified?

We may modify this Privacy Policy from time to time, which will be indicated by changing the date at the top of this page. If we make any material changes, we will notify you by email (sent to the email address specified in your account). If you do not accept a new edition of the Privacy Policy, you must stop using the website and services.

XI. Contact Us

Kind reminder, if you have any questions about this Privacy Notice, please contact us via the following contact details:

Address: Georgiou Gennadiou, 10 AGATHANGELOS COURT, Office 203, 3041, Limassol, Cyprus.

Email: info@gamicorpgroup.com