

# A2TAG Privacy & Cookies Policies

## **Who we are**

Nemesida Smart Data Ltd, operating under the marketing brand name “A2TAG”, including the website [a2tag.com](https://a2tag.com) and all its subdomains (hereinafter referred to as “A2TAG”, “we”, “us”, “our”, or “website”), is a company duly registered in the Republic of Cyprus as a limited liability company

This Privacy Policy governs the manner in which A2TAG collects, uses, maintains and discloses personal data collected from the Users of the A2TAG Services.

Please read the following Privacy Policy carefully to understand our practices regarding your information and how A2TAG will use it.

By continuing to use A2TAG Services, you acknowledge that you have read, understood and accepted the information described in this Privacy Policy. If any User does not agree with this Privacy Policy in general or any part of it, such User should not access or use the A2TAG Services.

## **Our Data Protection Principles**

We adhere to the principles relating to processing of personal data set out in the GDPR which require personal data to be:

- Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency).
- Collected only for specified, explicit and legitimate purposes (Purpose Limitation).
- Adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation).
- Accurate and where necessary kept up to date (Accuracy).
- Not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation).
- Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage (Security, Integrity and Confidentiality).
- Not transferred to another country without appropriate safeguards being in place (Transfer Limitation).
- Made available to data subjects and data subjects allowed to exercise certain rights in relation to their Personal Data (Data Subject’s Rights and Requests).

- We are responsible for and must be able to demonstrate compliance with the data protection principles listed above (Accountability).

## **Data Collected**

Creating an Account in A2TAG system is required for using many of the features of the A2TAG Services. We require certain information about you at registration, including your login (email) and password (which you generate), your full name. Other required and optional information may be input by you as well. Any other information or content you provide us on the Service will be saved and associated with your account, including information that is used for funds transfers (either to us or from us).

We may record information about your usage of the A2TAG Services such as which products you view and choose, the frequency and size of data transfers and other statistics. A2TAG may keep a record of any correspondence between you and us, including support requests, e-mails and live chats.

As well, by a user performing any actions on A2TAG Website we may automatically collect the following information:

- Your platform, OS and browser versions, timezone, IP (Internet protocol) and other technical information.
- Analytical information considering your A2TAG Website visits. This information may include: the incoming source of your visit, your behavior flow, bounce-rate, enter and exit pages, page response times, certain pages spending time, and other information.

## **Data Usage**

By submitting your personal information and accepting the A2TAG Terms of Use and Privacy Policy on our Website you consent with the legitimate grounds of processing your personal information.

We may use the information you give us to provide you with certain features and to create a personalized experience on A2TAG Website. We may also use that information to operate, maintain and improve features and functionality of the A2TAG Services and perform the contract we have with use.

We may be processed the transaction data, including your contact details, payment details, transaction details, for the purpose of payment and keeping proper records of those transactions.

You might be required to provide their personal and payment processing data (such as name, surname, address, copies of ID cards or other identifying documents, residence place

confirmation documents, credit card identification data) to the respective payment processor, including the consent for processing these data by the payment services in order to carry out the requested transactions.

**PLEASE NOTE** that the respective personal and payment processing data provided by you to a third party Payment processor shall be collected, stored and processed solely by the respective Payment processor and not subject to this Privacy Policy. You should read carefully and follow the applicable privacy policies of the Payment processor.

We may use your personal information for marketing purposes to promote our Website (Platform) and A2TAG Services. Please note that we need additional consent in order to add you to A2TAG newsletter mailing list, however, you may choose to stop receiving this information by notifying us.

We use commercially reasonable means to keep your information strictly confidential. However, your information will be shared with other parties in the following situations:

1. Information regarding your websites, applications, offers, services and/or properties will be made available to other users of the A2TAG Services for the purposes of selling.
2. With third parties that assist us in providing you with A2TAG Services, such as payment processors (either to us or from us), business and analytics providers, content providers, marketers, and cloud service providers, but we require our third parties to only use your information for the purposes of providing the services requested of them and in accordance with this Privacy Policy.
3. We may in our discretion release certain data to comply with legal obligations, court orders or in order to enforce our Terms and other agreements. We may also release certain data to protect the rights, property or safety of us, our users and others. This includes providing information to other companies or organizations like the police or governmental authorities or intellectual property owners for the purposes of protection against or prosecution of any illegal activity, whether or not it is identified in the Terms. You acknowledge and agree that we may release your personal information in such circumstances, and waive all rights and objections thereto.
4. To our professional advisers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice, or the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

When we disclose your information to the third party, we require those third parties to have appropriate technical and organizational measures in place to protect your personal data. We will not share any of your personal data for any purpose other than the purposes described in this Privacy Policy, nor will we sell your personal data to anyone.

## **Protection of User's Data**

In order to help keep your data secure, we use SSL certificates for end-to-end encrypted connections among all of our servers, Services, and client applications.

We have put in place commercially reasonable physical, electronic, and organizational procedures to safeguard and secure the information we collect.

We do not store any of your payment or credit card information on our servers. The data is encrypted and securely stored by independent companies which provide payment-processing services for A2TAG.

## **Data Protection Rights**

In respect to the General Data Protection Regulation, all Users will have the following rights regarding personal data we hold about the Users:

1. The right to be informed. Users have a right to be aware of our personal data protection clauses and data processing activities, whose details are contained in this Privacy Policy.
2. The right to access. You have a right to request for information about the personal data we hold about you by creating a support ticket. Please state a compelling reason for the request.
3. The right of data correction. You have an option to update your personal data using your profile section. In order to change any additional information please inform us and we will update our data records as soon as possible.
4. The right to erasure. If you no longer wish us to hold your personal data, please notify us using the support ticket system and we will remove it from our database within a month. Please note that it is not possible to provide our services without holding your personal data.
5. The right to restrict processing. You have a right to object that we are no longer processing your personal data in certain ways, whilst not requiring us to delete the same data.
6. The right to transfer portability. You have a right to receive a personal data copy we hold about you. As well, you may request that we transfer your personal data directly to the third party if it's technically possible.
7. The right to object. If you feel your fundamental rights and freedoms are being impacted you have a right to object to us using your personal data, unless we have overriding legitimate grounds for such processing. As well, you have a right to object if we use your personal data for marketing purposes (including profiling) or for statistical and research purposes. Please notify us of your objection and we will cease such data processing.
8. The right to withdraw consent. Withdraw the consent you gave us with regard to the processing of your personal data for certain purposes, such as to allow us to promote our products and services to you.

## **Cookies**

We use cookies and other similar technologies ("Cookies") to enhance User's experience using the A2TAG Services. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, and to deliver a better and more personalized service.

Cookies may be either "persistent" Cookies or "session" Cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

We use the following Cookies:

- Strictly necessary Cookies. These are Cookies that are required for the operation of the Website.
- Analytical/performance Cookies. They allow us to recognize and count the number of Users and to see how Users move around the Website when they are using it. This helps us to improve the way the Website works. We use Analytics Software which is a web analytics tool that helps us understand how Users engage with the Website. This information is used to compile reports and to help us improve A2TAG Website. The reports disclose Website trends without identifying individual visitors. You can opt out of them without affecting how you visit A2TAG Website.
- Functionality Cookies. These are used to recognize you when you return to the Website. This enables us to personalize A2TAG content for Users (for example, User's choice of language).

## **Children**

We don't work with people under 18 years old and do not knowingly collect personal information from children under the age of 18. If we learn that we have collected the personal information of a child under the age of 18, we will take steps to delete the information as soon as possible.

## **Retention**

We will keep your personal data for as long as is necessary for the purpose for which we initially collected them. Once such period has ended, we will keep your personal data for the longest of the following periods: a) any retention period set out in our retention policy which is in line with regulatory requirements relating to retention; or (b) the end of the period in which legal action or investigations might arise in respect of the services provided.

## **External Links**

A2TAG Website may contain links to external websites not owned by or officially affiliated with A2TAG in any way. A2TAG is not responsible for the privacy practices or content of such

websites. We advise you to review the privacy policy of external sites before providing any personal information.

## **Changes to this Privacy Policy**

A2TAG has the discretion to update this Privacy Policy at any time. When we do, we will post a notification on the main page of our website, revise the updated date at the bottom of this page. We encourage Users to frequently check this page for any changes to stay informed about protection of all the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

## **Contacts**

If you have any questions about our privacy policy or wish to obtain more details in relation to the personal data, we process about you or wish to exercise any of your rights set out in this Privacy Policy please contact us via email at: [support@a2tag.com](mailto:support@a2tag.com)

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