

eIDoktor Privacy Policy

1. Introduction

eIDoktor respects your privacy and is committed to protect Data. This Privacy Policy will inform you as to how we look after Data when you visit and use our Mobile Application and/or Website “App” (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

2. Glossary

You OR Your: shall refer to the users of our App/website.

Data: the information that we collect from you while using the

App/website. **Service:** means the services provided through eIDoktor’s

App/website.

3. Important information and who we are

3.1 Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how eIDoktor collects and processes Data through your use of our App/website, including any Data you may provide through this App/website when you register and/or use our Services, as well as install and sign up to our App/website.

This App/Website is not intended for children who are below 18 years old.

It is important that you read this Privacy Policy along with our Terms and Conditions when we are collecting or processing Data about you so that you are fully aware of how and why we are using this Data. This Privacy Policy supplements other notices and Privacy Policies and is not intended to override them.

3.2 Controller

Engage Technologies LLC is the controller and responsible for Data (referred to as "eIDoktor", "we", "us" or "our" in this Privacy Policy). eIDoktor is the controller and responsible for this App/website.

If you have any questions about this Privacy Policy, please contact us using the details set out below.

3.3 Contact details

If you have any questions about this Privacy Policy or our privacy practices, please contact us through the email address:

E-mail address: [info@eldoktor.com]

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3.4 Changes to the Privacy Policy and your duty to inform us of changes

We keep our Privacy Policy under regular review. It is important that the Data we hold about you is accurate and current. Please keep us informed if Data changes during your relationship with us.

3.5 Third-party Links

This Platform (App) may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share Data about you. We do not control these third-party applications/websites and we are not responsible for their privacy statements. We recommend for you to read the Privacy Policy of every application/website you visit.

4. Data that we collect

Data means any information about an individual from which that person can be identified. It does not include Data where the identity has been removed (anonymous Data).

We **may collect**, use, store and transfer different kinds of Data about you which is including, but not limited to the following:

- a) Identity Data includes first name, maiden name, username or similar identifier, date of birth and gender.
- b) Children's Data.
- c) Contact Data includes e-mail address and mobile number.
- d) Financial Data includes bank account and payment card details.
- e) Technical Data includes your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the App/Website.
- f) Profile Data includes your username and password, your interests, preferences, purchasing power, reviews and ratings, feedback and survey responses.
- g) Usage Data includes information about how you use our App.

We also collect, use and share aggregated Data such as statistical or demographic Data for any purpose. Aggregated Data could be derived from Data but is not considered Data in law as this Data will not directly or indirectly reveal your identity. For example, we may aggregate your usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect aggregated Data with Data so that it can directly or indirectly identify you, we treat the combined Data as Data which will be used in accordance with this Privacy Policy.

We do not collect any special categories of Data (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). Nor do we collect any information about criminal convictions and offences.

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5. If you fail to provide Data

Where we need to collect Data by law, by using our App, and you fail to provide the required Data, we may not be able to perform our Services. We will notify you if this is the case at the time.

6. How is Data collected?

We use different methods to collect Data from and about you including through:

6.1 Direct interactions. You may give us your Identity, contact and financial Data by filling in forms or by corresponding with us by phone or e-mail or otherwise. This includes Data you provide when you undertake the following:

- a. Create an account on, or exploit, our App;
- b. Enter a social competition, promotion or survey; or
- c. Provide us with feedback or contact us.

6.2 Automated technologies or interactions. As you interact with our App/Website, we will automatically collect technical data about your browsing actions and patterns. We collect this Data by using cookies, server logs and other similar technologies.

7. How we use Data

We will only use Data when the law allows us to. Most commonly, we will use Data in the following circumstances:

- a) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- b) Where we need to comply with a legal obligation.
- c) Where we need to set up your account and administrate it.
- d) Where we need to carry out surveys.
- e) Where we need to personalize content, user experience or business information.
- f) Where you have given consent.

Generally, we do not rely on consent as a legal basis for processing data although we will get your consent before sending third party direct marketing communications to you via e-mail or text message. You have the right to withdraw consent to marketing at any time by contacting us.

8. Purposes for which we will use Data

A) Performance of our Services:

We process Data because it is necessary for the performance of our Services through our

App/Website.

In this respect, we use Data for the following:

- i. To prepare a proposal for you regarding the Services we offer;
- ii. To provide you with the Services as set in the scope of our Services, or as otherwise agreed with you from time to time;
- iii. To deal with any complaints or feedback you may have;
- iv. For any other purpose for which you provide us with the Data which we collect.

In this respect, we may share Data with or transfer it to the following:

- i. Subject to your consent, independent third parties whom we engage with to assist in delivering the Services to you;
- ii. Our Professional Advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers;
- iii. Our Data storage providers.

The legal basis for the processing of the aforementioned Data categories is Art. 6 (1) (a) of the European General Data Protection Regulation (GDPR). Due to the said purposes, in particular to guarantee security and a smooth connection setup, we have a legitimate interest to process this Data.

B) Legitimate interests:

We also process Data because it is necessary for our legitimate interests, or sometimes where it is necessary for the legitimate interests of a third party.

In this respect, we use Data for the administration and management of our business, marketing purposes, archiving or statistical analysis.

C) Legal obligations:

We also process Data for our compliance with a legal obligation which we are under. In this respect, we will use Data for the following:

- i. To meet our compliance and regulatory obligations;
- ii. As required by tax authorities or any competent court or legal authority.

D) Marketing:

We will send you marketing about Services we provide which may be of interest to you, as well as other information in the form of alerts, newsletters, notifications for discounts and deals, or functions which we believe might be of interest to you or in order to update you with information which we believe may be relevant to you. We will communicate this to you in a number of ways including by telephone, SMS, e-mail or other digital channels as appropriate.

E) Promotional offers from us:

We may use Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which merchants, products, Services, discounts and deals may be relevant to you.

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You will receive marketing communications from us in case of using our website, and you have not opted out of receiving these marketing communications.

F) Third-party marketing:

- i. We will get your express opt-in consent before we share Data with any third party for marketing purposes.
- ii. You can ask us or third parties to stop sending you marketing messages at any time by logging into the Website and checking or unchecking relevant boxes to adjust your marketing preferences, or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

G) Cookies:

You can set your browser to refuse all or some browser cookies, or to alert you when Apps set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

H) Change of purpose:

We will only use Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us on the e-mail address [info@eldoktor.com]. If we need to use Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

I) Opting out:

Where you opt out of receiving these marketing messages, this will not apply to Data provided to us as a result of a redemption of a product/Service, warranty registration, Product/Service experience at a Merchant's Store or other relevant transactions.

9. Disclosures of Data

We may share Data with the parties set out in Article (6) in relation to the specified purposes for which we will use the Data above.

We may share Data with third parties to whom we may choose to sell, transfer or merge parts of

our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use Data in the same way as set out in this Privacy Policy.

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We require all third parties to respect the security of Data and to treat it in accordance with the law. We do not allow our third-party service providers to use Data for their own purposes and only permit them to process Data for specified purposes and in accordance with our instructions.

10.Data security

We have put in place appropriate security measures to prevent Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to Data to those employees, contractors, third party service providers and other parties who have a valid need to know. They will only process Data in accordance with our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

11. Data retention

How long will we use Data?

We will only retain Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory or reporting requirements. We may retain Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for Data, we consider the amount, nature and sensitivity of the Data, the potential risk of harm from unauthorized use or disclosure of Data, the purposes for which we process Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, or other requirements.

When it is no longer necessary to retain Data, we will delete it.

12.What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access Data (or to exercise any of your other rights). This is a security measure to ensure that Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information to improve our Services.

13.How do we deal with the “right to be forgotten”?

You have the right to request the erasure of Data that we hold about you in certain

circumstances, for example if it were not acquired for, or has ceased to be necessary for, a lawful purpose. This is known as the right to be forgotten. Where you request that we erase your Data, we will usually only do so where the Data has ceased to be publicly available or where we no longer use it.

LAWFUL BASIS

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Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best Service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process Data or for our legitimate interests. We do not use Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Comply with a legal obligation means processing Data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

External Third Parties

Service providers providing the Services throughout our App.

Professional advisers acting as processors or joint controllers including lawyers, bankers and auditors as the case may be, who provide consultancy, banking, legal and accounting services.

YOUR LEGAL RIGHTS

You have the right to:

Access to Data on our App. This enables you to receive a copy of Data we hold about you and to check that we are lawfully processing it.

Request correction of the Data that we hold about you. This enables you to have any incomplete or inaccurate Data we hold about you corrected, though we may need to verify the accuracy of the new Data you provide to us.

Request erasure of personal Data. This enables you to ask us to delete or remove Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove Data where 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 Data to comply with local law.

Object to processing of Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular 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 where we are processing 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.

Request restriction of processing of Data. This enables you to ask us to suspend the processing of Data in the following scenarios:

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- If you want us to establish the Data's accuracy.
- Where our use of the Data is unlawful, but you do not want us to erase it.
- 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.
- You have objected to our use of Data, but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of the Data to you or to a third party. We will provide to you, or a third party you have chosen, the Data in a structured, commonly used and machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use.

Withdraw consent at any time where we are relying on consent to process 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 the Services to you. We will advise you if this is the case at the time you withdraw your consent.

You will not have to pay a fee to access Data (or to exercise any of the other rights).

How to contact us? If you have any questions about how we use Data, or you wish to exercise any of the rights set out above, please contact us on our contact details mentioned in Section 3.3 of this Privacy Policy.

