

## **PRIVACY POLICY**

In this Privacy Policy references to “**GAMI**”, “**GAMI Move**”, the “**Company**”, “**we**”, “**our**” or “**us**” are references to Gami Technology OÜ and references to the “**App**” and the “**Services**” are references to GAMI Move application.

As GAMI, it is our priority to protect the personal data of our Users (the “**User(s)**”, “**you**” and collectively with others using the App - (“**Users**”) or third parties who use our App and to create transparency and mutual trust in these matters. This Privacy Policy explains how we and our related entities will collect your personal data and protect your privacy.

### **1. PURPOSE**

**1.1.** The purpose of this policy is to regulate the methods and principles to follow to ensure that the Company processes personal data in line with the Data Protection Laws.

### **2. IMPLEMENTING THE POLICY**

**2.1.** The relevant legislation terms in effect during the processing and protection of personal data will be applied first. If there is a conflict between legislation terms and policy terms, the Company accepts that up-to-date legislation terms prevail.

### **3. PERSONAL DATA COVERED UNDER THIS POLICY**

**3.1.** This Privacy Policy covers your personal data. Personal Data is data, information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable. All personal data received in connection with our business is subject to strict rules of confidentiality.

**3.2.** Common examples include your IP address, Location and Movement, and Tracking Record.

**3.3.** We also collect data about your location and physical movements (Location and Movement Tracking) in order for the App to function properly and monitor and verify forms of eligible movement. You may turn location monitoring on and off from time to time using the settings of the operating system of your mobile device but, if you disable this functionality, we will not be able to collect data relating to your step-count and GPS/Cell-ID location which will prevent tracking and/or conversion of your movement into rewards.

### **4. COLLECTION OF PERSONAL DATA**

#### **4.1. Data that you give us**

**4.1.1.** We may collect your personal data directly from our contact with you. This may include you completing forms or parts of our website, Social Media, App and/or other software and/or mobile applications, by you providing us with consent to access personal data such as photographs, videos or photo albums, by you providing with consent to access the microphone and/or camera on your device, or by you contacting us via the email, telephone, through Social Media and other similar functions either directly through our website or the App or third party host websites, in person, through various marketing channels or competitions either directly through our website or the App or third party host websites, and surveys. You understand that any personal data that you provide to us must be accurate and up to date. We will assume this to be the case.

#### **4.2. Data that we collect about you**

**4.2.1.** In this Privacy Policy "Social Media" means social media networking sites of any kind or nature including but not limited to web or internet-based or mobile telephonic devices or mediums such as Facebook, Twitter, Instagram and LinkedIn which enable the creation and exchange of user-generated content. Our website, Social Media, App and/or other software and/or mobile applications may automatically collect the following data about you each time you visit or otherwise use our website, Social Media, App and/or other software and/or mobile applications:

1. technical data including but not limited to the Internet Protocol Address used to connect your device to the internet, the internet browser and version that you are using when accessing our website, Social Media, App or other software and/or mobile applications, any additional plug-ins that you are using, and your device's operating system and platform; and
2. data about the time and date you accessed our website, Social Media, App or other software and/or mobile applications, and what you accessed on our website, Social Media, App or other software and/or mobile applications. This includes links that you clicked on, what content you accessed, how long you accessed that content, whether you downloaded any content, whether supplied by us or downloaded from a third party host and how you navigated to and from our website, Social Media, App or other software and/or mobile applications to other sites, apps or other pages hosted by us.

**4.2.2.** Where you consent to our collection of your sensitive data , you also consent to us using that sensitive data for the purpose/s for which it was collected, including its disclosure to third parties.

## **5. PROCESSING OF PERSONAL DATA**

**5.1.** You may choose not to provide some of the personal data described above. Please note, however, that some of our services require some personal data to operate, so if you choose not to provide the personal data necessary to operate and provide you with a particular service or feature of that service, you may not be able to use that service or feature.

### **5.2. Principles for processing personal data**

**5.2.1.** The Company processes all personal data in line with Data Protection Laws, in pursuit of up-to-date, specific, clear, and legitimate purposes and in a fashion that is limited, proportionate, and related to the purpose.

- **Processing in line with the law and honesty rules**  
the Company acts in line with the principles stemming from legal regulations, general trust, and honesty rules to process personal data. In this scope, the Company considers the proportion of requirements when processing personal data and does not utilize the data for reasons other than what the purpose requires.
- **Ensuring the accuracy and up-to-date nature of personal data**  
the Company ensures the accuracy and up-to-date nature of the personal data that it processes, considering the basic rights of the data owners and its legitimate interests.
- **Processing for specific, clear, and legitimate reasons**  
the Company explicitly and clearly defines its legitimate and legal purpose for processing personal data. the Company processes data in relation to the products and services it provides and only as much as is necessary. the Company clearly states the purpose for processing personal data before personal data processing begins.
- **Having boundaries and acting conservatively concerning the purposes for processing**

the Company processes personal data in a fashion that allows for carrying out the specified objectives and avoids processing personal data that is unrelated to the objective or unnecessary.

- **Storing for no longer than is predetermined in the related legislation or is necessary for the purposes of processing**

the Company stores personal data for as long as defined in the relevant legislation or necessary for its purpose. In this scope, the Company determines whether a duration for keeping the personal data is laid out in the relevant legislation. If a duration period is specified, the Company abides by this duration. If not, the Company keeps the personal data for as long as is necessary for the purpose for which the personal data was collected. When the period permitted for holding the data ends or the reasons for processing the data disappear, the Company erases, disposes of, or anonymizes the personal data.

## **5.2. The Company's reasons for processing personal data**

**5.2.1.** The Company inform the data subjects when collecting personal data. In this scope, the Company sheds light on the identity of the Company and its representatives (if applicable), the purpose for processing the personal data, to whom and why the processed personal data might be transferred, the method for collecting personal data and the lawful reason for collection, and the rights of the data subjects.

**5.2.2.** The Company processes personal data in line with the terms below.

### **Terms**

- The law may dictate that the Company processes personal data;
- To verify your physical movement and location and issue rewards on the basis of this verified data;
- To investigate and/or prevent suspected fraud or other criminal activities or misuse of our services, including the collection and disclosure of user location and movement data
- the Company's processing of personal data may be directly related to and necessary to signing or carrying out a contract. Personal data may be processed to prepare a proposal during the beginning phase of a contract or to fulfil data subjects' requests related to the results of a contract. During contract preparation, data subjects may be contacted in light of the data they have provided;
- Certain of your personal data may be shared with other players of the App as part of the normal operation of our services;
- using your personal data for marketing purposes to provide or offer services to you. This includes, but is not limited to, keeping you up to date with our latest news, events, special offers and promotion of our brand or other similar products that we think that you may be interested in. This includes both our direct marketing to you or another third party to whom you have authorized us to disclose your personal data;
- the Company is allowed to process data if it is required to fulfil a legal obligation or if the law requires the personal data or allows these transactions. It is necessary for data transactions to be necessary for the legally allowed data processing activity and must conform to the relevant legal terms in terms of type and scope;
- the Company is obliged to process the data to establish, use or protect the rights of the Company;

- the Company is obliged to process the data for its own legitimate interests (provided the basic rights and freedoms of the persons whose data is processed are not violated). Legitimate interests are interests that are in line with the law, morals, and customs, as well as material interests.

*the Company's legitimate interests in processing personal data might include collecting receivables, avoiding violating contracts and legal obligations, and benefiting from storage, hosting, maintenance, and support services to provide IT services related to technology and security. the Company can process the personal data of its employees, provided their basic rights and freedoms are not damaged, for use when deciding upon promotions, raises or benefits, or distributing tasks and roles during the restructuring of the company. Basic principles regarding protecting personal data will be abided by and the balance of the interests of the data personnel and the data subject will be considered.*

If the circumstances above do not exist, the Company asks for explicit consent to process personal data from the personal data owner or through the relevant customers.

### 5.3. Purposes

- Defining and applying the Company's strategies and ensuring the execution of the other policies of our company;
- relationship management, account management, internal financial reporting, and provision of IT services (including storing, hosting, maintenance, and support activities);
- executing processes and operations, finance operations, communications, market research, and purchasing operations (requests, proposals, evaluations, orders, budgeting, contracts) in order to determine and apply the Company's trade and business strategies;
- planning, auditing, and performing data security processes, setting up and managing IT infrastructure;
- planning and executing market research activities for purchasing and marketing and/or promotion of work activities and services;
- planning and executing data access authorizations of partners and/or suppliers, managing relationships with partners and/or suppliers;
- planning and executing the necessary operational activities to perform company activities in line with company procedures and/or legislation;
- ensuring that data is accurate and up-to-date;
- informing authorities as required by legislation;
- communicate with you, including to inform you of updates to the App, our website, our Terms and/or this Privacy Policy;
- for consumer engagement and/or customer service purposes, including but not limited to identifying the effectiveness of advertising, allowing you to participate on website viral features such as sharing website content and other community features (for example, blogs);
- where data is or relates to system version data of your device, or the make and model of your device, for the purpose of our compatibility assessments with our software versions and other aspects of our services;
- where we collect or disclose data that is or relates to the Internet Protocol Address used to connect your device to the internet, for the purpose of fraud detection and management of the integrity of the GAMI Move system and other services.

- notifying you about any changes to our products, website, App and/or other software and/or mobile applications, brand or services offered.

## **6. THIRD-PARTY COLLECTION OF PERSONAL DATA**

**6.1.** This Privacy Policy only addresses the use and disclosure of the Personal Data We collect from You. To the extent that You disclose your data to other parties through the use of Our Services such as by clicking on a link to any other websites of our partner networks, different rules regarding Privacy Policies may apply to their use or disclosure of Personal Data You disclose to them.

**6.2.** You hereby acknowledge that We will not be responsible for the products, services, or descriptions of products or services that You receive from the third-party websites or to the content or privacy practices of the third-party sites. Your relationship with these third parties and their services and tools is independent of your relationship with Us. These third parties may allow You to permit/restrict the data that is collected. It may be in your interest to individually restrict or enable such data collections.

## **7. SHARING YOUR PERSONAL DATA**

**7.1.** We will not rent, sell, or disclose your Personal Data to any third parties, except to those who require access to the data to perform their tasks and duties under the binding agreements executed with Us and to share with third parties who have a legitimate purpose for accessing it.

**7.2.** We may share, transfer, disclose, or allow access to your Personal Data to the following third parties for the purposes described below:

**7.3.** We may disclose Personal Data to the third parties in order to administer or process a transaction, or services You have authorized or requested, or in the context of facilitating the execution of a transaction, or We may disclose Personal Data to third parties that provide supporting services, or analytical data for the purpose of the Service improvement, only where we have a lawful basis to do so or under an agreement or legal requirements for the transfer of Personal Data.

**7.4.** We may share your Personal Data with law enforcement, and government officials when We are compelled to do so by a subpoena, a court order to prevent financial loss, to report suspected illegal activity or to investigate violations of any of Our Terms or any other applicable policies.

**7.5.** We may share your Personal Data with third-party processors acting on behalf of the Company or engaged by the Company to process your Personal Data for the Company, Our Affiliate and/or Our Partners.

## **8. COLLECTIONS OF YOUR DATA USING COOKIES AND OTHER TRACKING TECHNOLOGIES**

**8.1.** Our website and/or App and/or other mobile applications use "cookies". Cookies are small pieces of data sent from a website and stored in your web browser. These pieces of data will allow our website and/or App and/or other mobile applications to remember who you are and to obtain data from you which allows us to deliver you a better and more customized service.

**8.2.** As a result of our website and/or App and/or other mobile applications' use of cookies, we may collect data such as your IP address, online activity and your web browser details.

**8.3.** We will use both persistent cookies, which could remain on your device until their expiration (which can be, in some cases, up to 10 years), and session cookies, which are temporary files removed from your device once your browser is closed.

**8.4.** The types of cookies we may use include analytical and tracking cookies, which allow us to recognize and count the number of visitors and analyse use of the services, as well as to verify transactions, and advertising and re-targeting cookies, which allow us to generate appropriate advertising directed to you on our website as well as on the App.

**8.5.** If you enabled cookies when accessing our website and/or App and/or other mobile applications, we will take this as consent to our use of cookies and other technologies mentioned in our Privacy Policy.

## **9. TRANSFER OF PERSONAL DATA**

### **9.1. Domestic transfer of personal data**

**9.1.1.** The Company is obliged to act in line with the decision taken by the Personal Data Protection Council and related legislation.

**9.1.2.** The Company cannot transfer personal data to other natural or legal persons without the explicit consent of the data subject. The data may be transferred to administrative or legal institutions and entities authorized as defined in and within the limits of legislation without the explicit consent of the data subject to circumstances permitted by “Isikuandmete kaitse seadus” and other laws. It is also possible to transfer the data without approval in the circumstances explained in Article 6(1), GDPR.

**9.1.3.** The General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) directly applies in Estonia and permits personal data processing without consent if at least one of the following applies:

- The processing is necessary to enter into or perform a contract with the data subject or to take pre-contractual steps at the data subject's request.
- The processing is necessary for the controller to comply with a legal obligation.
- The processing is necessary to protect the vital interests of the data subject or another natural person.
- The processing is necessary to perform a task carried out in the public interest or in the exercise of official authority vested in the controller.
- The processing is necessary to pursue the controller's or a third party's legitimate interests unless the data subject's interests or fundamental rights and freedoms override those interests.

### **9.2. Cross-border transfer of personal data**

**9.2.1.** The Company may transfer personal data being processed in Estonia or being processed and stored overseas, as mentioned above, including that data being processed via external resource usage, to unrelated persons in Estonia or overseas, on the condition that it is transferred in line with the conditions defined in Articles 44 to 50, GDPR and other relevant legislation, taking all the safety measures defined in legislation.

**9.2.2.** The General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) applies directly in Estonia. The GDPR allows controllers and processors to transfer personal data within the European Economic Area (EEA) if a lawful basis (see Art. 7.1.) for the processing exists. Otherwise, it only allows for transfers of personal data outside of the EEA to third countries and international organizations based on:

- Adequacy decisions.
- Appropriate safeguards, such as binding corporate rules.
- Derogations from the general prohibition.
- Nonrepetitive transfers

### 9.3. Third Parties in which data is transferred

**9.3.1.** Third parties to whom the personal data might be transferred for the purposes mentioned above are as follows: subsidiaries and/or direct/indirect domestic/overseas institutions and other unrelated persons, who provide services, cooperate with the Company, and are program partners responsible, alongside the Company, for taking data security measures such as the protection of all kinds of personal data and preventing unauthorized access and illegal processing.

**9.3.2.** We may transfer personal data to third-party processors without data subjects' consent if we have another legal ground for processing the personal data (see 9.1 and 9.2).

## 10. THE RIGHTS OF PERSONS WHOSE PERSONAL DATA IS BEING PROCESSED

**10.1.** Natural persons whose personal data is processed by the Company can apply to [business@gamiworld.io](mailto:business@gamiworld.io).

**10.2.** You have the rights under the Data Protection Laws in relation to your Personal Data. These rights include the followings:

- **The right to access** - You have the right to request the Company for copies of your personal data. We may charge you a small fee for this service.
- **The right to rectification** - You have the right to request that the Company correct any data, information you believe is inaccurate. You also have the right to request the Company to complete information you believe is incomplete.
- **The right to erasure** - You have the right to request that the Company erase your personal data, under certain conditions.
- **The right to restrict processing** - You have the right to request that the Company restrict the processing of your personal data, under certain conditions.
- **The right to object to processing** - You have the right to object to the Company's processing of your personal data, under certain conditions.
- **The right to file a complaint** to the Estonian Data Protection Inspectorate (**"Andmekaitse Inspektsioon"**) if your rights have been violated upon processing of personal data.

### **Estonian Data Protection Inspectorate**

Väike-Ameerika 19

10129 Tallinn

Tel. +372 6274 135

Fax +372 6274 137

e-mail: [info@aki.ee](mailto:info@aki.ee)

Website: <http://www.aki.ee/en>

Art 29 WP Member: Mr Viljar PEEP, Director General, Estonian Data Protection Inspectorate

Art 29 WP Alternate Member: Ms Kaja PUUSEPP

**10.5.** The Company reserves the right to reject the data owner's request in cases where the Company has the right/is obliged to keep the data as per the terms of relevant legislation.

**10.6.** The Company may anonymize personal data when the reasons for processing personal data which is processed legally no longer exist.

## **11. LIMITATION**

**11.1.** Our Services are not designed for individuals who are under the age of 18 or under the legal age to provide consent under the applicable laws of the country or jurisdiction where You are using Our Services or Platform. If You are not over 18 or of the legal age of your country, You will not provide any Personal Data to Us, or engage in Our services. We reserve the right to access and verify any Personal Data collected from You. If We are aware that You are under 18 or under the legal age who already shared your Personal Data with Us, We will then discard such information and block your access to App, Site, Website and Services immediately.

**11.2.** We cannot guarantee that any losses, misuses, unauthorized accession, or alteration of your Personal Data will not occur. You hereby agree that You play a vital role in protecting your Personal Data , including your credentials.

## **12. HOW DO DATA OWNERS MAKE USE OF THEIR RIGHTS**

**12.1.** You can forward all your requests and objections regarding your personal data such as information, correction, deletion, or destruction to our Company through the addresses below

E-mail Address	business@gamiworld.io
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**12.2.** For unrelated persons to apply on behalf of personal data owners, a personal data owner must give a power of attorney through a notary to the unrelated person permitting them to apply on behalf of the data owner.

**12.3.** If the personal data owner forwards their request to the Company, the Company will finalise the request within 30 days at most, depending on the nature of the request. If the action the data owner requests necessitate an extra fee, the data owner may need to pay the fee defined in the tariff the Council determines.

**12.4.** The Company may ask for information from the data subject to determine whether the applicant is the personal data owner. the Company may ask questions of the personal data owner regarding their application to clarify issues in their application.

**12.5.** The Company may reject an application under certain conditions defined in Data Protection Laws, in which case the Company is required to explain the reason.

## **13. CHILDREN’S PRIVACY**

This App and our services are for general audiences and are not intended for use by anyone under the age of 18 ("Minor"). We do not knowingly collect any Personal Data from children younger than the age of eighteen (18), and we will delete any Personal Data collected that we later determine to be from a user younger than the age of eighteen (18). If you are a parent or guardian and you are aware that your Minor has provided us with Personal Data, please write to us at the address provided in the “Contact Us” section set forth at the end of this Privacy Policy and we will promptly delete the Minor’s Personal Data from our systems.

## **14. PRIVACY POLICIES OF THIRD-PARTY SITES**

The App may contain links to other Apps and Sites. Our privacy policy applies only to our App, so if you click on a link to another App, you should read their privacy policy.

## **15. CHANGES TO OUR PRIVACY POLICY**



The Company keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 22/08/2022. If you do not agree with the revised content, you shall stop accessing the Company immediately. When an updated version of the Privacy Policy is released, your continued access to the Company means that you agree to the updated content and agree to abide by the updated Privacy Policy. Unless stated otherwise, our current Privacy Policy applies to all Data that we have about you and your account.

## **16. CONTACT US**

If you have any questions about the Company's privacy policy, the data we hold on you, or if you would like to exercise one of your data protection rights, please do not hesitate to contact us at the above email address.