

## **DEBITUM NETWORK PRIVACY POLICY**

Debitum Network data collection practices are governed by the following Privacy Policy, which tells you what data Debitum Network collect, how we use that data and who has access to that data.

You have many rights that you can use to control your privacy. Debitum Network respects those rights. We want to help you exercise your rights, so you will find details on how to do so below.

Please take your time to read this policy and contact Debitum Network if you have any questions or feedback regarding our privacy policy.

### **1. YOUR DATA CONTROLLER**

Debitum Network is the controller of your personal data. Contact information of Debitum Network can be found here: <https://debitum.network>

Your Debitum Network data protection officer can be contacted at e-mail [support@debitum.network](mailto:support@debitum.network).

### **2. WHAT DATA DO DEBITUM NETWORK COLLECT AND HOW IS IT USED?**

#### **2.1. Website browsing statistics**

Debitum Network is constantly working to improve its website and aims to make using it as easy as possible. For this purpose, Debitum Network needs to know what information is most relevant to website visitors, how often they connect, what browser and device they use, what content is mostly read, what region visitors come from, and similar demographics and statistics.

Debitum Network collects this information by using an automated tool called Google Analytics. This allows Debitum Network to record and analyse how visitors use the website.

You can learn more about how Google Analytics works and the information it allows us to collect and analyse here –

<https://analytics.google.com/analytics/academy/course/>

Debitum Network uses this data on the basis of our legitimate interest as a business in improving our understanding of client needs and preferences in order to constantly enhance our services and improve client access to information that Debitum Network publishes.

You may at any time disable collection of your data by Google Analytics, as described here - <https://tools.google.com/dlpage/gaoptout/>.

#### **2.2. Logs**

The server that hosts the Debitum Network website may also record requests you make to the server, such as the web address you open, the device and browser you use, your IP

address, date and time of access. This data is used only for technical purposes – that is, to ensure the proper functioning and security of the website and to investigate possible security incidents.

The basis for collecting and using such data is Debitum Network's legitimate interest in ensuring the technical availability and security of the Debitum Network website.

### **2.3. Information that you provide us**

Debitum Network processes personal data that you provide while registering for the use of Debitum Network's webpages <https://debitum.network> and <https://platform.debitum.network> or creating a user account or that is otherwise obtained from you in connection with the preparation or administration of the services that Debitum Network provides to you or your company within the scope of our contractual relationship. Such personal data may include your name, surname, title, phone number, e-mail address, and other information that is necessary for your identification.

The processing of such personal data is necessary for Debitum Network to perform contractual and statutory obligations, as well as it allows us to prevent fraud.

The legal basis for use of such personal data by the Debitum Network is preparation for entering into contract, performing the contract as well as necessity to comply with statutory obligations.

### **2.4. Information that is obtained from other persons**

We might supplement the information described above with information we obtain from other sources.

The processing of such personal data is necessary for the Debitum Network to perform contractual and statutory obligations, as well as it allows us to prevent fraud.

The legal basis for use of such personal data by the Debitum Network is preparation for entering into contract, performing the contract as well as necessity to comply with statutory obligations.

## **3. COOKIES**

### **3.1. What are cookies?**

A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. A cookie enables the website to remember your actions and preferences – such as login, language, font size and other display preferences – over a period, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.

### **3.2. How does Debitum Network use cookies?**

Debitum Network's website uses cookies to collect your IP address and browsing information, such as the websites you have visited or the time you have spent on each page, and allows the Website to remember your system and preferences.

Other cookies allow Debitum Network to track website traffic and users' interaction with the website – Debitum Network uses this data to analyse visitors' behaviour and to improve visitors' experience. These cookies are placed and used by the Google Analytics tool.

Cookies are placed on your device only if you consent, unless cookies are required for strictly technical functioning of the website. However, note that if you do not consent to the use of cookies, certain functions of the website may not function properly or may not function at all.

The legal basis for the use of cookies is Debitum Network's legitimate interest in ensuring the technical functionality of the website. When cookies are used to remember your choices or for statistical purposes, the legal basis is your consent.

### **3.3. How to control cookies?**

You can control and/or delete cookies as you wish – for details, see <http://www.youronlinechoices.com/>. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. But if you do this you may have to manually adjust some preferences every time you visit a site, while some services and functionalities may not work.

## **4. MARKETING**

If you subscribe to the Debitum Network's newsletter via the Debitum Network's website or otherwise provide Debitum Network with your business contact details, Debitum Network may send you updates, newsletters or alerts which may be of interest to you and which are related to our business and platform news. You can always refuse from receiving such communication.

## **5. PROFILING**

Debitum Network may use website visitor statistical data to analyse trends and demographics of Debitum Network visitors. You can always refuse from being profiled by altering your cookie preferences.

## **6. WHO MAY ACCESS YOUR DATA**

Statistical data about Debitum Network visitors may be accessed by our marketing and IT employees and service providers who are responsible for analysing that data and for improving our website.

Debitum Network partners who provide Debitum Network with website content management tools or who host the Debitum Network website may have access to technical log files.

The Google Analytics tool provided by Google Inc. (a US company) has access to statistical data collected by that tool. Google Inc has subscribed to the EU-US Privacy Shield principles EU – US Privacy Shield list, which confirms that what we have provided complies with

mandatory EU privacy standards. Contractual obligations to ensure privacy are also applied to this provider, which you may read here:

<https://policies.google.com/privacy?hl=en&gl=de#enforcement>

Cookies are accessible by partner Doubleclick.net.

## **7. HOW LONG DOES DEBITUM NETWORK STORE DATA?**

Debitum Network retains your personal data for as long as needed or permitted in light of the purpose(s) for which it was obtained and as outlined in this Privacy Notice. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject; or (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Cookies are usually valid for a short term (a day, a week or a month), though in some cases they may remain valid for up to a year.

## **8. YOUR RIGHTS AND HOW YOU MAY EXERCISE THEM**

By contacting Debitum Network via e-mail at [support@debitum.network](mailto:support@debitum.network), you may exercise your right:

- to require access to your personal data;
- to require rectification of your personal data;
- to withdraw consent to processing of your personal data, where applicable.

In some cases you may have a right to request a restriction on processing your personal data or to object to processing of your personal data. In such cases you may exercise your right to require erasure of your personal data.

You may exercise your rights in line with the requirements of applicable EU and Latvian laws.

If personal data is erased at your request, Debitum Network will only retain such copies of the information as are necessary to protect our or third party legitimate interests, comply with governmental orders, resolve disputes, troubleshoot problems, or enforce any agreement you have entered into with Debitum Network.

You may disable cookies by your browser settings, or by visiting here:

<https://tools.google.com/dlpage/gaoptout/>

<http://www.youronlinechoices.com/>

## **9. RIGHT TO LODGE A COMPLAINT**

If you think your privacy rights have been breached, you may lodge a complaint with an authority of the EU country of your habitual residence. Contact information for these authorities can be accessed at [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080).