

# PRIVACY POLICY

Last updated: January 6<sup>th</sup>, 2021

Holdem LLC is committed to safeguarding your privacy and ensuring that you continue to trust Us with Your personal information.

**Customarily, We collect personal information only directly from you (contact data, payment, delivery details etc.). We will tell You what personal information is mandatory when placing an Order.**

As Our shopper, You provide Us with contact data, such as Your name, surname, postal or email addresses, phone number; transaction details, such as information about the Products You buy, credit card number and other credit card details; renewal options, geo-location data of Your mobile or other device, including GPS-based, Wi-Fi-based, or cell-based location information. We will mention which information is mandatory in order for You to successfully place an Order.

Even if You are not a shopper, You may provide Us with contact data, for example when you set up an account with Holdem LLC or when you enlist to our marketing communication thread.

We will interact with you (a) online, (b) offline or (c) when you interact with online targeted content (such as advertisements) that We or Our service providers provide to You via third party websites or applications.

**In specific cases, personal information about You is collected by Us automatically.**

We may collect personal information about You via automated means (such as cookies) when You interact with our ads, apps, or visit Our Websites. In such a case, personal information We collect may include IP address, browser type, operating system, mobile device identifier, geographical area, referring URLs.

**You may also provide personal information about others (for example when You place an Order on other's behalf). If so, You are responsible for the entire data You provide to Us (and We assume that You are authorized to give such data).**

In case the personal information provided by You concerns other persons, it will be Your responsibility to obtain prior authorization.

**We will collect Your personal information only with specific purpose in mind (processing an Order, sending You marketing communication etc.).**

Our focus is to process Your personal information only for specific purposes that allow Us to service You in the best possible manner or, otherwise to manage an interaction with Us.

Holdem LLC may store and use Your Personal Information and, without further notice to You, provide Your Personal Information to Holdem LLC affiliates or to third parties in order Holdem LLC, its

affiliates or third parties:

- to process an Order from You, including processing Your online payment and notifying You of the Order status,;
- to invoice You for the Products ordered by You;
- to deliver the Products ordered by You;
- to support Our intent to maintain and improve the security of Your Order and transactions (e.g., by applying antifraud filters);
- to register Your purchase with the Merchant (for warranty, technical support, or other purposes);
- to provide You with shopper and technical support;
- to inform You about Product upgrades; special offers; other products, services and information (including from third parties); market research; or completing surveys or evaluations; if You have opted to receive such communications;
- to support Our intent to show You the most relevant content and improve usability of the Website;
- to provide You with access to restricted areas of the Website;
- to comply with legal requirements;
- to enforce the terms and conditions of this Agreement, including the investigation of potential violations; or
- for any other lawful purposes.

Depending on the relationship You have with Us, the processing necessary to fulfil Our legitimate interest may be: to remind You about your abandoned shopping cart, to request Your feedback, to create and maintain Your Holdem.wiki myAccounts, to protect against, identify and prevent abuse, fraud and other types of crime, claims and other liabilities. You are entitled to oppose to such processing, and we will review your request and respond to it on a case by case basis.

Some data, such as the types of used services and how many users We receive daily, may be used by Holdem LLC for statistical, marketing, promotional, or any other lawful purposes. This kind of information is collected in aggregate/statistical form, without identifying any user individually.

In any case, We will not subject You to a decision based solely on automated processing that produces legal effects concerning you or similarly significantly affects You, unless you explicitly consented to the processing, the processing is necessary for entering into, or performance of a contract between You and Us, or when We are legally required / entitled to use Your personal data in this way, for example to prevent fraud.

**You must be older than 16 years in order to place an order with Us if you reside in EU. Otherwise, children's personal information is cautiously processed (only with specific safeguards).**

We do not knowingly solicit or collect personal information from children below the age of 16 when offering services of an informational society (except if explicit consent from parent or custodian is obtained in prior). This is applicable only for those residing in EU.

If We discover that accidentally We collected personal information from a child below this age, We will remove that child's personal information from Our records as soon as reasonably possible.

**In order to process Your Order, We will share Your personal information with our partners.**

Without any prior notice Holdem LLC may share your personal information with third parties for other

purposes, but only in the following circumstances:

- **Affiliates:** we may provide your personal information to affiliates or related companies for legitimate business purposes,
- **Merchants and their affiliates or partners:** Holdem LLC is an ecommerce platform that enables You to access worldwide Products and as such Holdem LLC must share Your personal information for the purpose of You processing Your Order,
- **Service providers:** Holdem LLC may engage service providers, consultants, external partners, agents or contractors to provide services on its behalf, including administering our media and services available to you. These third parties may come to access or otherwise process Your personal information in the course of providing these services Holdem LLC requires such third parties, to comply with all relevant data protection laws and security requirements in relation to Your personal information, by way of a written agreement.
- **Public Authorities:** Holdem LLC may disclose Your personal information if it is required to do so by law or if, in Ours good faith judgment, such legal disclosure is reasonably necessary to comply with legal processes or respond to any claims.

Some of Our services are provided through sites that bear Our partners' or suppliers' names and trademarks and are not in Our control, and this Website may contain links or other devices that take You to other websites that are also not in Our control. Certain of those other websites may provide products or services to You directly or on Our behalf. We are not responsible for any aspect of other websites, including, without limitation, the privacy practices, products, services, or content of such websites. This Privacy Policy will not apply to such other websites. Rather, Your activity and the information that You provide at such other websites will be subject to the privacy policy and other terms and conditions posted at such other websites.

**You have specific rights in respect of data protection and We foster an environment facilitating their exercise (right to access, rectify, object, delete, receive your personal information or to complaint).**

You have the right to:

- access your personal information, rectify it, restrict or object to its processing, or request its deletion,
- to receive the personal information You provided to Us or to transmit it to another company,
- to withdraw any consent provided,
- to opt out of some collection or uses of Your personal information, including the use of cookies and similar technologies, the use of Your personal information for marketing purposes, and the use for data analyses,
- where applicable, to lodge a complaint with your supervisory authority.

In accordance with the applicable law Holdem LLC will provide You with access to Your Personal Information and, as appropriate, the right to intervene in respect of Your Personal Information. You may also be entitled to object to the processing of Your Personal Information by Holdem LLC or to request the deletion of Your Personal Information, in which case, Holdem LLC in its sole discretion deems such Personal Information as mandatory, Holdem LLC may no longer permit You to engage in certain activities.

You can decide if You want to provide Your Personal Information to Holdem LLC, but if You do not provide certain Personal Information, You may not be able to make purchases, enlist services or access certain options at the Website or through other means. If You choose at the Website to receive communications regarding product information, special offers, or any other marketing or other information, We may add Your Personal Information to Our email database and use (or direct Our

designees to use) Your Personal Information for providing such communications to You. You may later choose to unsubscribe from receiving such communications by following the unsubscribe directions in Our communications. If You provide Holdem LLC with inconsistent privacy preferences at the Website (for example, by indicating on one occasion that We may provide You with marketing offers and on another occasion that We may not), Holdem LLC will endeavor to update Your privacy preferences in Holdem LLC's records with Your latest preference in a timely manner.

**If you are residing in the European Union, Your Personal information may be transferred outside the European Union or the European Economic Area.**

Personal Information provided to Holdem LLC by You, the Merchants, or other third parties, is primarily processed and stored on the servers located at Our offices within Russian Federation and/or the United States. We may change the location of the servers from time to time to other countries and without prior notice to You; however, Personal Information will continue to be protected in accordance with this Privacy Policy.

Your Personal Information may be transferred to persons within the European Union, Switzerland or to persons within other countries whose legislation may or may not ensure an adequate level of protection. We shall endeavor to comply with the laws of the country from which Your Personal Information was transferred, if We consider the laws of the country to which Your Personal Information was transferred as not ensuring an adequate level of protection.

**We installed adequate safeguards to secure Your personal information and We also implemented specific time periods so that to ensure that Your data is not retained longer than necessary for the stated purpose.**

**Data security.** Holdem LLC has implemented industry-standard measures to protect the security of the Personal Information We collect via the Website. For example, We use (SSL - Secure Socket Layers), a firewall and a digital certificate issued by Verisign™ to protect certain of Your Personal Information, and We are PCI DSS (Payment Card Industry Data Security Standard) certified. No one can guarantee, and We do not guarantee, that Your Personal Information is completely secure at all times, however We ensure You that the security of Your personal information is Our primary concern. You are also responsible for maintaining the confidentiality of Your Personal Information to protect it against unauthorized access or use.

**Retention.** We will only retain Your personal information for as long as You continue to use the Website or Products, and thereafter as permitted or required by applicable law, taking into account also our need to answer queries or resolve problems, provide improved and new services, and comply with legal requirements under applicable laws. This means that we may retain Your personal information for a reasonable period after your last interaction with us (as required by fiscal law, otherwise no longer than what is necessary to protect our legitimate interests, to defend against a claim or what is necessary pursuant to regulatory provisions).

When the personal information that We collect is no longer required in this way, we anonymize or delete it in a secure manner.

**We have a dedicated point for you to contact us in any privacy matters ([support@holdem.wiki](mailto:support@holdem.wiki)).**

All your options and messages will be responded based on the law requirements (one month since your request or longer if necessary. Nevertheless, please consider that in order to implement your requests or options we may need several days due to technical reasons (during such period we may continue to process your personal information based on your past options).

If You have any questions about this Privacy Policy, please send Your inquiry to [support@holdem.wiki](mailto:support@holdem.wiki) or to the applicable office identified in the "Contact Us" section of the Website.

Holdem LLC reserves the right to change this Privacy Policy at any time by posting notice of the changes on the Website.