

## **PRIVACY AND DATA POLICIES OF CSGOLOMBARD.COM**

In force since February 19, 2021G.C.

### **Privacy Policy**

1. This Privacy Policy explains the processing and protection of User's personal data when browsing and using csgolombard.com (the "Website") and any of its subpages.
2. The Privacy Policy contains all the rules regarding acquisition and processing of User's data. The Privacy Policy is also the fulfilment of the information obligation under Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
3. Our priority is to ensure privacy protection for the Users of our Website at the level corresponding at least to the minimum standards set by the law.
4. All User data collected by the Website as a result of its use is administered by DREALITY LTD, located at Anastasiou Sioukri, 1Pamelva Court, Flat/Office 33035, Limassol, Cyprus (the "Administrator").
5. The Website may contain hyperlinks to facilitate direct connection to websites owned and operated by third-parties. Please note that the Administrator does not accept responsibility for the privacy practices and cookies operated by third-party websites. Before using any third-party websites, it is recommended for Users to read the relevant privacy and cookie policies. If this material is not available, Users should contact the relevant third-party operator to receive information regarding their policies.

### **Rules for collection of information and personal data**

1. As Users view the Website, some data is collected automatically, i.e. information regarding the use of the Website, as well as the IP addresses of Users. Through the use of various technologies, we may log certain information, such as browser type, operation system, date and time of entry, number of connections, number of subpages of the Website opened, and content viewed.
2. Users are not required to disclose and/or share any personal data to view the homepage of the Website and its contents.

## **Extent and use of collected data and information**

1. In the course of transaction, a User of the Website may be requested to disclose the following personal data: name, surname, e-mail address and any payment details required to perform the payment via the relevant payment method, chosen by the User. Personal data that is essential for accessing specific features of the Website will always be marked, so that it is easily recognizable against non-essential data, the disclosure of which remains at the full discretion of the User.
2. If it is deemed necessary for a User to perform further identification of his identity (in connection with the Anti - Money Laundering (AML) procedures; as stated in the § (section) 3.4 of the CSGOLombard Terms and Conditions of Service, a User of the Website may be requested to disclose the following personal data: name, surname, date of birth, country and address, telephone number, or in specific and limited cases any additional data required to verify his identity deemed appropriate by the Administrator, including the User's identity documents appropriate for their country of origin. This data will not be, in any extent, used for reasons beyond the declared identity verification of the User.
3. Some features of the Website (i.e. logging in through Steam, carrying out transactions) may require disclosure of data mentioned below:
  - a. the unique number identifier of a Steam account;
  - b. the trade link associated with the aforementioned Steam account.A failure to do so may result in limited access to some of the Website's features.
4. Personal data collected during the registration is used to allow the User to log into the Website or any of its subpages and to use its essential features. Personal data may also be used by Administrator to fulfill its obligations toward the User.
5. Some or all of the personal data provided by the User in the Website contact form will be used to reply to the message placed by the User.
6. Personal data collected by the Administrator may be used to create a user profile to provide relevant content during Website browsing. At all times processing of these personal data will be in accordance with the law.
7. Data collected automatically is used for Website management, detection of security breaches, surveying user Website navigation, and for statistical purposes. This data will not be linked to personal User data nor will it be used to determine a particular User's identity. The type of automatically collected data depends on the preferences of the web browser selected by the User. All Users are advised to verify their web browser settings, in order to determine the kind of information being automatically disclosed by

their browser or to modify to their settings accordingly. It is recommended Users explore the contents of their web browser's help sections.

8. It is hereby stated that, in accordance with the provisions of the Law, there may arise a legal obligation to disclose data such as the IP address of the Website's User upon request of the national authority.

### **Terms and conditions for personal data processing**

1. Personal data is processed upon consent expressed by the User whose data is to be processed. It is also processed when Administrator, as personal data administrator, is allowed to do so under the provisions of law.
2. User consent to process personal data is granted first and foremost by marking a specific field, indicated during any procedure aimed at facilitating access to selected features of the Website, i.e. when filling in a form.
3. Administrator does not disclose personal data to any third party, unless consent has been granted by the User (e.g. when completing transactions essential data may be disclosed to entities participating in the completing transaction) or where disclosure of personal data is required by law.
4. As personal data administrator, the Administrator is entitled to entrust the processing of personal data collected by the Website to an external entity by means of a written agreement.

### **User rights**

1. All Users are entitled to access and amend their personal data.
2. All Users of the Website are entitled to be informed whether their personal data is processed and to what extent. This includes the right to information on the processing of User data. In order to exercise this right, Website Users may contact Administrator via e-mail at: [privacy@csgolombard.com](mailto:privacy@csgolombard.com) in order to learn how User's data is processed by Administrator, the purpose and manner in which User data collected on the Website is processed, or in order to access, amend or have your personal data deleted.

### **Cookies**

1. Our Website uses cookies.
2. Cookies are small text-numeric files downloaded onto the User's device used to access the Website (such as home computer or smartphone, or any other device used to

access the Website). Cookies enable our system to recognize the User, when the User will visit the Website again using the same device.

3. Cookies collect data regarding the use of the Website by a User. Their main purposes are to facilitate the use of the Website by the User, adapt the Website to the needs and expectations of a given User (i.e. personalized subpages, promotions) and survey user traffic within the Website.
4. Cookies are not used to determine a User's identity.
5. Cookies are used on the Website with the User's consent. Such consent can be obtained by a pop-up box or by continuing to browse after the appearance of an information bar indicating that do so will result in cookies being placed, which cookies, the purposes thereof and by whom.
6. The User is entitled to withdraw or change the extent of their previously granted permission for cookie use on the Website at any moment, as well as to delete them from his or her web browser.
7. The User is also entitled to limit or disable cookie use in his or her web browser, by modifying relevant settings in order to block cookies or be prompted before a cookie is stored on the end device, used for viewing the Website. In such case it is possible that the User's experience on the Website will be less efficient. The User may not be able to access particular content or use some of the features on the Website, or in extreme cases, correct display of the Website's pages may not be available.
8. We use the following types of cookies:
  - session cookies that collect information on User's activity once a particular website has been loaded and expire after the session on the Website has ended;
  - persistent cookies that are stored on the User's end device (computer, smartphone or any other device used to access the Website) and remain on the device for an extended period of time, after the web browser has been closed;
9. We also use following specific types of cookies:
  - "necessary" – cookies files that are allowing the use of Services available within the Service for example authentication cookies used for Service that require authentication;
  - "security" - cookies files used to ensure safety for example the one used to detect abuse of authentication through the Service;
  - "performance" – cookies files that are allowing to collect information about Service usage;
  - "functional" - cookies files that enable to "remember" settings selected by User e.g. interface customization, language, font size, appearance etc.

## **Personal data protection**

1. Security devices aimed at personal data protection protect the Website. The data processed by Administrator is protected against modification, deletion, unauthorized access, disclosure or acquisition, or loss, as well as against unlawful processing, in violation of legal provisions setting out the rules of procedure for personal data processing.
2. Only a limited number of Administrator's employees are allowed to access the Users' personal data. These employees have been authorized by the Administrator in its capacity as the data administrator.
3. In the case of any changes to this privacy policy, they will be available publicly and at an unchanged address within the Website.

## **Contact**

If you have any questions regarding this Policy, please contact us via e-mail at: [privacy@csgolombard.com](mailto:privacy@csgolombard.com).