

PRIVACY AND COOKIE POLICY

Last updated: 30.08.2016

Cubux - Service of personal finance

1. Introduction

1. We are committed to protecting and respecting your privacy. This Privacy and Cookie Policy ("**Policy**") describes how we treat information that you provide to us or that we collect about you.

2. By personal data, we refer to data that relates to you as an identified or identifiable person. Personal data include your name, your address, your telephone number, your e-mail address, your age, your gender and your game preferences. Anonymous information, which we are not in a position to relate to you, does not qualify as personal data.

3. We may collect personal data as well as other information when you use the following services:

- Our websites, including <https://cubux.net> <https://cubux.de> <https://cubux.cz> (the "**Sites**").

- Your use of any of our products and services (including support services) which may be accessible via a third party platform, web application, gaming or social networking service (together the "**Ancillary Services**").

In this Policy we refer to the Sites, the Account and the Ancillary Services together as the "**Services**".

4. Please read this Policy carefully. If you wish to create an Account on any of our Sites, you will need to accept our Terms of Service and this Policy. By accepting this Policy, you signify your consent to the collection and other processing of your personal data in accordance with and for the purposes set out in this Policy.

2. Who we are

We are

**Alfa Solution spol. s.r.o.,
Za poriczkou branou 334/4,
Prague 181 00, Czech Republic,**

We respect your right to privacy and will only process personal data and other information you provide to us or we collect about you in accordance with applicable privacy and personal data protection laws.

3. What is Personal Information?

'Personal Information' means data that identifies you and is associated with a specific person. Personal information does not include information that is anonymous, aggregated, or is no longer identifiable to a specific person.

4. Information we may collect from you

We collect many kinds of information in order to operate effectively and provide you the best products, services and experiences we can. We collect information, including personal information, when you provide it to us, such as when you register or open an account, sign in, pay a bill, or call us for support. We may also automatically collect information when you use our sites and services. We also may get information from other companies or 3rd parties. We automatically collect information in a variety of ways, including from web forms, through technologies like cookies, web logging, and software on your computer or other device.

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

Identification Info (e.g. name, Social Security number, phone, address);

Credit score and credit history;

Account balances and payment/transaction history;

Registration info;

Bill and payment information; and

Any 3rd party data (such as your bank account information) synced with your account.

5. Cookies

1. The Sites use cookies and similar technologies that collect Tracking Data to distinguish you from other users. This helps us to provide you with a good experience when you access the Sites and use the Services.

2. A cookie is a small file of letters and numbers that a website places on your computer or device when you visit a website. You are given the opportunity to consent to using of cookies or refuse from them as you enter our Sites (to get this far, you have already either consented or opted out of their use). If you have opted out, we only store one permanent 'compliance' cookie which tells us that you want to opt out of use of any other cookies. For more information about cookies, we recommend that you visit www.allaboutcookies.org.

3. The cookies that are used on the Sites fall into the categories described below. These descriptions can help you determine if and how you would like to interact with our Sites and other online services.

Strictly necessary cookies

These cookies are essential in order to enable you to navigate the Sites and use certain features. Without these strictly necessary cookies, the online services provided by the Sites cannot be provided. It is therefore not possible for you to opt out of use of these cookies. In addition, the coding language the Sites are written in uses session cookies. These are deleted each time you close your browser. These cookies do not store any information about the visitor once the browser is closed.

Performance cookies

Our performance cookies collect anonymous information about how you use the Sites and their features. For instance, our performance cookies collect information about which pages on the Sites are visited most often, which advertisements you view or interact with on the Sites or other websites on which our advertisements appear and if you receive any error messages.

Analytics cookies

The Sites use Google Analytics, a web analytics service provided by Google, Inc. (“**Google**”). Google Analytics uses “cookies”, which are text files placed on your computer, to help us analyse how users use the Sites. The information generated by the cookie about your use of the Sites (including your IP address) will be transmitted to and stored by Google on servers in the United States. In case of activation of the IP anonymisation, Google will truncate/anonymize the last octet of the IP address for Member States of the European Union as well as for other parties to the Agreement on the European Economic Area. Only in exceptional cases, the full IP address is sent by us to and shortened by Google servers in the USA. On behalf of us, Google will use this information for the purpose of evaluating your use of the Sites, compiling reports on website activity for us and providing other services relating to website activity and internet usage to us. Google will not associate your IP address with any other data held by Google.

The Sites may use other similar analytics cookies. These cookies are used to collect information about how visitors use the Sites. The information is collected anonymously, and used to report on the number of visitors to the Sites, where they have come from, and the pages they have visited.

Furthermore you can prevent Google’s collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout/>. Further information can be found under <http://www.google.com/analytics/terms/gb.html> (Google Analytics Terms of Service & Privacy).

Functionality cookies

Functionality cookies are used to remember choices you make (such as language preference, country location, or other online settings) and collect anonymous information.

Targeting or advertising cookies

Third-party targeted advertising cookies may be placed on your device by third-party advertisers, ad networks, data exchanges, marketing analytics and other service providers. Third-party targeted advertising cookies collect information about your browsing activity across multiple websites and online services in order to provide you with relevant advertisements on the websites and online services of third parties. Ad networks may share this information with the advertisers using their network. The information collected using these third-party advertising cookies does not disclose your identity, but will be used to

identify you across multiple web sites.

6. How we use your information

We may use the information that you provide to us or that we collect about you for the following purposes:

1. Provision of services. Account Data, Tracking Data and Content Data may be collected and processed by us to provide you with the Services that you request from us and to perform the Terms of Service accepted by you. Data collected for that purpose will only be kept as long as necessary to provide the requested Services, and comply with applicable laws.
2. Any data collected may be processed by us to detect, investigate and prevent activities that may be illegal, or that may violate the Terms of Service or Forum Rules, or that may violate the EULA or Game Rules in respect of any of the Games. Such data will be kept for a maximum duration of six months after the Account closure.

Creation of additional promotion and advertising and creation of user profiles:

- **You may opt out by following the unsubscribe link at the bottom of each e-mail you receive from us. You may opt-out from use of your e-mail address for this purpose at the time your Account is created and afterwards at any time by sending an e-mail from the e-mail address registered to your Account to privacy@cubux.net stating that you do not wish to receive such information. It can take up to 5 (five) business days for us to process and satisfy your request. We may use or permit selected third parties to use the e-mail address registered to your Account to provide you with information about products and services similar to our Services that you request from us, unless you choose to opt out from this service. The e-mails will not be forwarded to you more often than three times a week.**
- **We may use Tracking Data to monitor, improve, or modify the Services and our operations.**
- **We may create a “personal user profile” by connecting your Account Data with your Tracking Data for purposes of improving, or modifying the Services and our operations and, for our own promotions, advertising and market research.**

7. Sharing your information

1. We will not share your personal information with anyone else unless in the following limited circumstances:

- To the extent that we are required to do so by applicable law, by a governmental body or by a law enforcement agency, or for crime prevention purposes.

2. Where such sharing involves our transfer of your personal data to a country outside the European Economic Area, we will ensure compliance with applicable law.

8. Security

1. We take reasonable precautions to prevent the loss, misuse or alteration of your personal information. Our employees, contractors and agents may be given access to your personal information which we collect, but their use shall be limited to the performance of their duties

in relation to facilitating your use of the Services. Our employees, contractors and agents who have access to your personal information are required to keep that information confidential and are not permitted to use it for any purposes other than those listed above or to deal with requests which you submit to us.

2. We have implemented all reasonable technical, administrative and physical security measures to protect the security of your information.

9. Third party sites

The Services may contain links to other websites operated and services provided by third parties, including those retailers you enter into a transaction with. Please note that this Policy applies only to the personal information that we collect through the Services and we cannot be responsible for personal information that third parties may collect, store and use through their websites or their services. You should always read the privacy policy of each website you visit carefully.

10. Your rights

In addition to your opt-out right under section 4.2, you may exercise the following rights at any time:

- You may ask us to provide you with copies of the personal information that we hold about you, or with information about the processing of such information.
- You may ask us to update and correct any out-of-date or incorrect personal information that we hold about you.

If you wish to exercise any of these rights, then please contact us at privacy@cubux.net. If you ask us to delete personal information about you then we may retain an archived copy of this information if required to do so by law.

11. Changes to this Policy

We may change this Policy from time to time for various reasons such as changes to reflect in law and regulation, changes in industry practices and technological developments. In case you have a registered Account, you will be notified of any changes of this Policy via e-mail to the e-mail address related to your Account. The latest version of this Policy will always be available on the Sites. Any new version of this Policy shall take effect (i) immediately upon the date of your receipt of the notification e-mail where the changes to this Policy relate to non-material changes which do not reduce your rights; or (ii) no less than thirty (30) days after your receipt of the notification e-mail where the changes to this Policy potentially reduce your rights; or (iii) in case you do not have a registered Account, the moment they are uploaded to our Services.

12. Questions and comments

If you have any questions or comments about this Policy, please contact us at privacy@cubux.net.