

Paracosm Privacy Policy

This Privacy Policy describes in what manner we process your personal data in accordance with the **requirements of European law.**

You may find all detailed information regarding **collection, processing and use** of your Personal data below.

At PARACOSM (HiTech Powerup OU, address of registration: Harjumaa, Tallinn, Lasnamae linnaosa 15551, Estonia) (PARACOSM), we care about the privacy of your data and are committed to protecting it. This Privacy Policy (together with our Terms and Conditions of Use) governs our collection, processing and use of your Personal Information. This Privacy Policy explains what information we collect, processing and storage about you and why, what we do with that information, and how we handle that information. We'll also explain what choices you have with respect to the information.

Applicability of This Privacy Policy

This Privacy Policy applies to your participation with Paracosm website (paracosm.com) and projects ("Affiliate Program") (collectively, the "Products"), and other PARACOSM websites (collectively, the "Sites") and other interactions (e.g., customer service inquiries, user conferences, etc.) you may have with PARACOSM. If you do not agree with the Privacy Policy, do not access or use the Products, Sites or any other aspect of PARACOSM's business.

This Privacy Policy applies to the Company's employees, contractors and officers.

The policy does not apply to third party services. Where third party services are used, and the third party is not a Data Processor, no Relevant Data (as defined below) is shared with them, or the Relevant Data has been anonymized such that the GDPR does not apply. Information collected by third parties is governed by their privacy practices. We encourage you to learn about the privacy practices of those third parties.

Definitions

Capitalized terms used in this Policy and not otherwise defined shall have the meanings provided below:

Product: PARACOSM Products

Relevant Data - Personal Data and Special Categories of Data are the Relevant Data covered by this policy and as defined in the Data Protection Legislation.

Personal Data - any information relating to an identified or identifiable natural person. "Personal data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special Categories of Data - Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data and data concerning health or a person's sex life or sexual orientation.

Processing/Processed - any operation on personal data, whether automated or not.

Information We Collect and Receive

When you interact with our Sites and Products, we collect Information that, alone or in combination with other data, could be used to identify you (Personal Data). Some of the Information we collect is stored in a manner that cannot be linked back to you (Non-Personal Data).

Payments Information

Payments information provided by you via the Sites will be stored and processed by payment systems and any other third-party service providers as designated by us from time to time. We will collect certain information on the Sites required for payment systems and such third-party services providers to process payments, including credit / debit card numbers, security numbers and other related payment information. All such information is subject to the privacy policy of payment systems or any other third-party service provider as applicable.

Other Information

PARACOSM also collects, generates and/or receives Other Information:

1. Usage Information

Certain data about the devices you use to connect with PARACOSM and your use of the Sites and/or Products are automatically logged in our systems, including:

- Personal Information. This is name, e-mail, phone number, Skype, etc.
- Company Information. This is company name, web-site link.
- Location information. This is the geographic area where you use your computer and mobile devices (as indicated by an Internet Protocol [IP] address or similar identifier) when interacting with our Sites and/or Products.
- Log data. As with most websites and technology services delivered over the internet, our servers automatically collect data when you access or use our Sites and/or Products and record it in log files. This log data may include the IP address, browser type and settings, the date and time of use, information about browser configuration, language preferences, and cookie data.
- Products and Sites Specific Data. This is information about the PARACOSM Sites and/or Products you use and how you use them. We may also obtain data from our third-party partners and service providers to analyze how users use our Sites and/or Products. For example, we will know how many users access a specific page on the Site and which links they clicked on. We use this aggregated information to better understand and optimize the Site.

- Device information. These are data from your computer or mobile device, such as the type of hardware and software you are using (for example, your operating system and browser type), as well as unique device identifiers for devices that are using PARACOSM Products.

2. Third Party Data

PARACOSM may receive data about Site visitors, marketing campaigns and other matters related to our business from affiliates and subsidiaries, our partners or others that we use to make our own information better or more useful. This data may be combined with Other Information we collect and might include aggregate level data, such as which IP addresses correspond to zip codes or countries. Or it might be more specific: for example, how well an online marketing or email campaign performed.

3. Collection Information from Children

PARACOSM does not knowingly collect personal information from children under the age of 16. If we determine we have collected personal information from a child younger than 16 years of age, we will take reasonable measures to remove that information from our systems. If you are under the age of 16, please do not submit any personal information through the Site and/or Products. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy by instructing their children never to provide personal information through the Sites and/or Products without their permission.

4. Cookies

PARACOSM uses cookies and similar technologies in our Sites and Services that help us collect Other Information. The Sites and Services may also include cookies and similar tracking technologies of third parties, which may collect Other Information about you via the Sites and Services and across other websites and online services. For more details about how we use these technologies, please see our [**Cookie Policy**](#) below.

What is a cookie? A cookie is a small text file that is placed on your hard drive by a web page server. Cookies contain information that can later be read by a web server in the domain that issued the cookie to you. Some of the cookies will only be used if you use certain features or select certain preferences, and some cookies are essential to the Site, Software, and/or Services, and will always be used. Web beacons, tags, and scripts may be used in the Site or in emails to help us deliver cookies and count visits, understand usage and campaign effectiveness, and determine whether an email has been opened and acted upon. We may receive reports based on the use of these technologies by our service/analytics providers (for example, Google Analytics) on an individual and aggregated basis.

Why does PARACOSM use cookies? PARACOSM and our marketing partners, affiliates, and analytics or service providers use cookies and other technologies to ensure everyone who uses the Site, Software, and/or Services has the best possible experience. For example, when you use our Site, we may place a number of cookies in your browser. We use these cookies to enable us to hold session information as

you navigate from page to page within the Site, improve your experience, and track and analyze usage and other statistical information. If you elect not to activate the cookie or to later disable cookies, you may still visit our Site, and use our Software or Services, but your ability to use some features or areas of those offerings may be limited.

How to disable cookies?

You can generally activate or later deactivate the use of cookies through a functionality built into your web browser. To learn more about how to control cookie settings through your browser:

- [Click here to learn more about managing cookie settings in Mozilla Firefox;](#)
- [Click here to learn more about managing cookie settings in Google Chrome;](#)
- [Click here to learn more about managing cookie settings in Microsoft Internet Explorer;](#)
- [Click here to learn more about managing cookie settings in Safari;](#)
- [Click here to learn more about managing cookie settings in Microsoft Edge.](#)

In addition, certain third-party advertising networks, including Google, permit users to opt out of or customize preferences associated with your Internet browsing. To learn more about this feature from Google, [click here](#).

Types of cookies PARACOSM uses

Each cookie used by PARACOSM falls within one of the following categories:

1. Essential cookies

Essential cookies (First-Party Cookies) are sometimes called “strictly necessary,” as without them we cannot provide many services that you need. For example, essential cookies help us to identify your account and remember your preferences as you use our Site, Software, and/or Services.

2. Analytics cookies

These cookies track information about your visits and usage of the Site, Software, and/or Services so that we can make improvements and report our performance — for example, to analyze visitor and user behavior so as to provide more relevant content or suggest certain activities. We might also use analytics cookies to test new ads, pages, or features to see how users react to them. Google Analytics is the main technology we currently use in this regard.

Cookies subject to change

If you have any questions and/or proposals to change uses cookies or regarding how PARACOSM uses cookies, you may contact us by submitting a help desk request here or by e-mailing: info@paracosm.games

Using Your Information by PARACOSM

We use, process, and store your information as necessary to perform our contract with you and for our legitimate business interests, in operating our Sites, Products, Services, and business including:

- to help us administer our Sites and/or Products, authenticate users for security purposes, provide personalized user features and access, process transactions, conduct research, and improve the features and usability of our Sites and/or Products;
- As required by applicable law, legal process or regulation.
- to calculate aggregate statistics on the number of unique devices using our Sites and/or Products;
- to send emails and other communications. We may send you service, technical and other administrative emails, messages and other types of communications. We may also contact you to inform you about changes in our Products, our Products offerings, and important Products-related notices, such as security and fraud notices. These communications are considered part of the Products and you may not opt out of them. In addition, we sometimes send emails about new product features, promotional communications or other news about PARACOSM. We will only send you marketing information if you consent to us;
- for billing, account management and other administrative matters. PARACOSM may need to contact you for invoicing, account management and similar reasons and we use account data to administer accounts and keep track of billing and payments.
- to investigate and help prevent security issues, fraud and abuse.

If information is aggregated or de-identified so it is no longer reasonably associated with an identified or identifiable natural person, PARACOSM may use it for any business purpose.

Controller and processor

In providing the Services to direct users PARACOSM acts as Controller of Personal Data collected from such Users. In the case of Indirect Users, PARACOSM acts as a Processor. In performing its obligations as Processor PARACOSM shall at all times act on Controller's behalf and according to Controller's lawful instructions.

Furthermore, PARACOSM shall adhere to the following general principles with respect to Personal Data processing:

- not to collect more Personal Data than is necessary for the purpose of providing the Services;
- not to use Personal Data for any other purposes than those specified in this Privacy Policy;
- ensure that all employees authorized by PARACOSM to process Personal Data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality; and
- not to knowingly solicit, access, collect and/or process any Special Categories of Personal Data.

How We Share and Disclose Information

We only disclose Personal Data to third parties when:

- We use service providers who assist us in meeting business operations needs, including hosting, delivering, and improving our Products. We also use service providers for specific services and functions, including email communication, customer support services, and analytics. These service providers may only access, process, or store Personal Data pursuant to our instructions and to

perform their duties to us.

- We have your explicit consent to share your Personal Data (if required).
- We believe it is necessary to investigate potential violations of the Privacy Policy, Cookies Policy, Advertising Policy and Terms and Conditions, to enforce Privacy Policy, Cookies Policy, Advertising Policy and Terms and Conditions, or where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, or potential threats against persons, property, or the systems on which we operate our Site and/or Products.
- We determine that the access, preservation, or disclosure of your Personal Data may be requested by public authorities, including national security or law enforcement requests by law to protect the rights, property, or personal safety of PARACOSM and users of our Site and/or Products, or to respond to lawful requests.
- We need to do so in connection with a merger, acquisition, bankruptcy, reorganization, sale of some or all of our assets or stock, public offering of securities, or steps in consideration of such activities (e.g., due diligence). In these cases, some or all of your Personal Data may be shared with or transferred to another entity, subject to this Privacy Policy.

PARACOSM does not sell or rent your Personal Data.

Third Parties' Applications and Products

Some third-party applications and services that work with us may ask for permission to access your information. Those applications will provide you with notice and request your consent in order to obtain such access or information. Please consider your selection of such applications and services, and your permissions, carefully.

Data collected by third parties through these apps and plugins is subject to each parties' own policies. We encourage you to read those policies and understand how other companies use your data.

E-mailing by PARACOSM

From time to time, we may want to contact you with information about product announcements, software updates, and special offers. We also may want to contact you with information about products and services from our business partners.

We only send marketing communications to users with your prior consent.

All PARACOSM account holders will continue to receive transactional messages related to our Products, even if you unsubscribe from promotional emails.

Data storage, transfer, retention, and deletion

Data Storage and Transfers

Information submitted to PARACOSM will be transferred to, processed, and stored in PARACOSM's data bases. When you use the Products on your computing device, user content you save will be stored locally on that device and synced with our servers. If you post or transfer any Information to or through our Sites and/or Products, you are agreeing to such information, including Personal Data and user content, being hosted and accessed in the crypted data bases.

Duration of Information Storage

You can change or remove your Personal Data in your personal account at

Paracosm.com, except for payment documents. You can change your payment information at any time on your by emailing us with the respective request: info@paracosm.games However, we may keep some of your Personal Data for as long as reasonably necessary for our legitimate business interests, including fraud detection and prevention and to comply with our legal obligations including tax, legal reporting, and auditing obligations.

You can download your data from affiliate account in Paracosm in CSV format.

At any time, you may limit or terminate the storage and processing of its data by Paracosm. In the event that the Affiliate decision to restrict or terminate the processing of Paracosm data makes it impossible to achieve the objectives of the affiliate program, Paracosm has the right to terminate cooperation with the Affiliate immediately after the fixation of the refusal or restriction from the terms of this Privacy Policy.

After deleting the data, Paracosm will delete all data from the integrated systems and controller systems to which the data was transferred. However, we may keep some of your Personal Data for as long as reasonably necessary for our legitimate business interests, including fraud detection and prevention and to comply with our legal obligations including tax, legal reporting, and auditing obligations.

Safeguards

When you give us personal information, we take steps to make sure that it's treated securely.

Non-sensitive details (your email address etc.) are sent normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

We use industry-standard encryption to protect your data in transit by SSL/TLS protocols.

Once we receive your data, we protect it on our servers using a combination of technical, physical, and logical security safeguards. The security of the data stored locally in any of our Products installed on your computing device requires that you make use of the security features of your device. We recommend that you take the appropriate steps to secure all computing devices that you use in connection with our Site and Products.

The Company takes the security of your data very seriously and works to protect your data from loss, misuse and unauthorized access or disclosure.

All staff and officers who handle Relevant Data are aware of this policy and have been given training in how to correctly collect, process, store and delete data. The Company holds a log of when staff training was undertaken and updates it on an annual basis.

Data Breaches

All breaches will be reported to the relevant supervisory authority within 72 hours, unless the data was anonymized or encrypted or if it has a particularly high risk.

Breaches of this policy by staff, contractors, officers of the Company will be dealt with under the Company's grievance and disciplinary policy and may lead to a disciplinary sanction.

If PARACOSM learns of a security system breach, we may attempt to notify you and

provide information on protective steps, if available, through the email address that you have provided to us or by posting a notice on the Site. Depending on where you live, you may have a legal right to receive such notices in writing.

Your Rights

PARACOSM uses, processes, and stores Personal Data, as necessary to perform our contract with you, and based on our legitimate interests in order to provide the Products and Services. We rely on your consent to process Personal Data to send promotional emails and to place cookies on your devices. In some cases, PARACOSM may process Personal Data pursuant to legal obligation or to protect your vital interests or those of another person.

Your rights	What does this mean?
The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data, and your rights. This is why we are providing you with the information in this Privacy Policy.
The right of access	You have the right to access, and receive a copy of, any personal data we hold about you (subject to certain restrictions). In exceptional circumstances we may charge a reasonable fee for providing such access but only where permitted by law. Access your Personal Data report by submitting a request at info@paracosm.games . This report will include the Personal Data we have about you, provided to you in a structured, commonly used, and portable format.
The right to rectification	You have the right to have your personal data rectified if it is incorrect or outdated and/or completed if it is incomplete.
The right to erasure/right to be forgotten	In some cases, you have the right to have your personal data erased or deleted. Note this is not an absolute right, as we may have legal or legitimate grounds for retaining your personal data. You may ask us to correct information you think is inaccurate or completely delete all information that we hold about you by emailing: info@paracosm.games .
The right to object to direct marketing, including profiling, and any processing based on our legitimate interests	You can unsubscribe or opt out of our direct marketing communication at any time. The easiest way to do this is by clicking on the “unsubscribe” link in any email or communication we send you. In circumstances where you have the right to object to profiling or any processing based on our legitimate interests, you should contact us using the details below.

<p>The right to withdraw consent at any time for and personal data processing based on consent</p>	<p>You can withdraw your consent to our processing of your personal data when such processing is based on consent. Where you withdraw your consent, this does not affect the lawfulness of our processing before your withdrawal.</p>
<p>The right to object to processing based on legitimate interests</p>	<p>You may object at any time to our processing of your personal data when such processing is based on our legitimate interests.</p>
<p>The right not to be subject to a decision based solely on automated decision-making</p>	<p>Where we use your personal data to make an automated decision about you, you have the right to object to our decision. Your right does not apply if: (i) you gave us your explicit consent to use your personal data to make our decision; (ii) we are allowed by law to make our decision; or (iii) our automated decision was necessary to enable us to enter into a contract with you.</p>
<p>The right to lodge a complaint with a supervisory authority</p>	<p>You have the right to contact the data protection authority of your country in order to lodge a complaint against our data protection and privacy practices. Do not hesitate to contact us at the details below before lodging any complaint with the competent data protection authority as we will always seek to resolve your complaint in the first instance. It is your right to lodge an objection to the processing of your personal data by emailing: info@paracosm.games if you feel the “ground relating to your particular situation” apply.</p>
<p>The right to data portability</p>	<p>You have the right to move, copy or transfer personal data from our database to another. This only applies to personal data that you have provided, where processing is based on a contract or your consent, and the processing is carried out by automated means.</p>
<p>The right to deactivate cookies</p>	<p>The settings from the Internet browsers are usually programmed by default to accept cookies, but you can easily adjust it by changing the settings of your browser or, where available, by using the tools on our websites.</p> <p>Many cookies are used to enhance the usability or functionality of a website; therefore, disabling some types of cookies may prevent you from using certain parts of our websites.</p> <p>If you wish to restrict or block all the cookies which are set by our websites, please use the tool available on the particular website (if applicable), or refer to the Help function within your browser to learn how to manage your settings within your</p>

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Changes to our Privacy Policy

This privacy policy coming into effect on 15 January 2018 and is in line with the GDPR guidelines.

We may need to update this Policy to keep pace with changes in our Sites, Products, and Services, our business, and laws applicable to us and you. We will, however, always maintain our commitment to respect your privacy.

The Company reserves the right to change these conditions from time to time as it sees fit. Any changes to our privacy policy will be posted on our web site 15 days prior to these changes taking place. You are therefore advised to re-read this statement on a regular basis.

Please note that your continued use of PARACOSM after any change means that you agree with, and consent to be bound by, the new Policy. If you disagree with any changes in this Policy and do not wish your information to be subject to it, you will need to stop using the Sites and/or Products.

Contact us

You may contact us with any questions comments, or concerns about this Privacy Policy or the information practices of this Website, by e-mailing: info@paracosm.games.