PRIVACY POLICY

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Who is collecting the data?

Digital Future Foundation, 777 United Nations Plaza, New York, NY 10017, USA (hereinafter referred to as: "Digital Future Foundation", "we", or "us") acts as Data Controller and recognizes its responsibilities in relation to the collection, holding, processing, use and/or transfer of personal data under the national applicable laws and regulations and the Regulation (EU) 2016/679 (hereinafter referred to as: "General Data Protection Regulation" or "GDPR"). Personal data will be collected only for lawful and relevant purposes and all practicable steps will be taken to ensure that personal data held by us is accurate. We will use your personal data which we may collect in accordance with this Privacy Policy. Your personal data shall be processed lawfully, fairly and in a transparent manner. We collect your personal data when you use services within the GNation platform, i.e. when you visit the following websites: gn.org; play.gn.org; gshare.gn.org; store.gn.org; dogood.gn.org; account.gn.org) (hereinafter referred to as: "the Sites") whereby by services we mean execution of registration process, competing in GNation tournament system, sharing PC power with GNation computing network, participation in humanitarian and educational GNation projects, purchases of virtual goods in GNation store and providing marketing materials regarding GNation platform (hereinafter referred to as: "the Platform Services").

What data is being collected and for which purpose/s?

Data we collect directly from you:
To create an account for you on the Gnation platform, we will collect your e-mail address, username (nickname) and password. Your personal data will be used for the following purposes:

- To process your registration;
- To provide you with our Platform Services and administer your account in relation to such Platform Services;
- To provide you with marketing materials regarding GNation platform.

Data we collect automatically:

- Electronic data (http headers, IP address, cookies, web beacons/pixel tags, browser information, information about your hardware);
- Date and time of accessing the Sites or Platform Services;
- Information related to your activity when using the Sites or Platform Services (e.g. what games you played on the platform, what tournaments you tried etc.);
- (Geo) location information.

Cookies

A cookie is a small text file that can be stored on and accessed from your device when you visit our website. We use cookies to navigate our website efficiently and perform certain functions. Due to their core role of enhancing/enabling usability or site processes, disabling cookies may prevent you from using certain Platform Services.

We use the following types of cookies:

- strictly necessary cookies / technical cookies: these cookies are required to run the Sites and provide you with the Platform Services and may, among other, allow us to identify your hardware and software, including your browser type;
- statistical / analytic cookies: these cookies enable us to recognise users, count the number of users and collect information such as your actions on the Sites and the Platform Services, including the web pages you visit and the content you retrieve;
- performance cookies: these cookies collect information about how users interact with our Sites and Platform Services, enabling us to identify errors and test new functionalities to improve the performance of the Sites and the Platform Services;
- functionality cookies: these cookies enable us to provide specific functionalities in order to improve your experience on the Sites, for example by storing your preferences (e.g. language and location);

You may wish to restrict the use of cookies or completely prevent them from being set. Most browsers provide for ways to control cookie behaviour such as the length of time they are stored – either through built-in functionality or by utilizing third party plugins. If you disable cookies, please be aware that some of the features of Platform Services may not function correctly.

Google Analytics

We use Google Analytics in order to conduct research and statistical analysis. Google Analytics services cannot function without the use of cookies. These text files that are saved within each user's browser will record data about the visitor's activity which is then sent to Google and, in turn, used to create analytical reports.
Please note that if you do not provide us with your personal data, we may not be able to provide the information, products or Platform Services you have asked for or be able to process your requests.

What is the legal basis for processing the data?

We will collect and process your personal data – e-mail, username (nickname) and password, since these personal data are necessary in order to take steps at your request prior to entering into a contract with us (making an account on the GNation platform).
Consent is the legal basis for processing your personal data – e-mail, in order to provide you with marketing materials related to the GNation platform. Where you have given your consent and have

not subsequently opted out, we may use your e-mail address to send promotional materials to you and conduct direct marketing activities in relation to the Platform Services. You have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. If you do not wish to receive any promotional and direct marketing materials or do not wish to receive specific types of marketing materials through a specific means of communication, please contact us through our communication channels set out in the "Contact us" section below.
Legitimate interest is the legal basis for data we collect automatically and which are used by us for purposes that are not harmful to your privacy and can be reasonably expected within the context of your use of Platform Services, such as analytics, research and optimisation of Platform Services.

Will the data be shared with any third parties?

The personal data we collect will not be shared or disclosed to any third parties. However, we may be required to retain, process and/or disclose your personal data in order to comply with applicable laws and regulations or in order to comply with a court order, subpoena or other legal process, whether in the UK or elsewhere, or to comply with a request by a government authority, law enforcement agency or similar body, whether in the UK or elsewhere. We may need to disclose your personal data in order to enforce any agreement with you, protect our rights, property or safety, or the rights, property or safety of our employees.

How will the information be used and protected?

We use appropriate technical and organizational measures to protect the personal data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal data. We will take all practicable steps to ensure the security of your personal data and to avoid unauthorized or accidental access, erasure or other use of your personal data. This includes physical, technical and procedural security methods, where appropriate, to ensure that your personal data may only be accessed by authorized personnel.

How long will the data be stored for?

Should your account or relationship with us be cancelled or terminated at any time, we shall cease processing your personal data as soon as reasonably practicable following such cancellation or termination, provided that we may keep copies of your data as is reasonably required for archival purposes, for use in relation to any actual or potential dispute, for the purpose of compliance with applicable laws and regulations and for the purpose of enforcing any agreement we have with you, for protecting our rights, property or safety, or the rights, property or safety of our employees, and for performing or discharging our functions, obligations and responsibilities. The data we process on the basis of your consent will be stored until the consent is withdrawn.

What rights does the data subject have?

You have the following data protection rights:

- Request **access** to your personal data. You may have the right to request access to any personal data we hold about you as well as related information, including the purposes for processing the personal information, the period for which the personal data will be stored, the source of the personal data, and the existence of any automated decision making;
- Request **correction** of your personal data. You may have the right to obtain without undue delay the rectification of any inaccurate personal data we hold about you;
- Request **erasure** of your personal information. You may have the right to request that personal data held about you is deleted;
- Request **restriction of processing** your personal data. You may have the right to prevent or restrict processing of your personal data;
- Request **transfer** of your personal data (data portability). You may have the right to request transfer of personal information directly to a third party where this is technically feasible;
- Request withdrawal of your consent.

You can exercise your rights at any time by contacting us using the contact details provided under the "Contact us" section below.

How can the data subject raise a complaint?

If you have any questions or concerns about our use of your personal data, please contact us using the details provided in "Contact us" section. If you are not satisfied with the way any complaint you make in relation to your personal information is handled by us then you may refer your complaint to the relevant data protection supervisory authority. You have the right to lodge a complaint with a supervisory authority, in particular in the state of your habitual residence, place of work or place of the alleged infringement.

Updates to this Privacy Policy

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will act appropriately to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws. You can see when this Privacy Policy was last updated by checking the "last updated" date displayed at the top of this Privacy Policy.

Children privacy

Our website is intended to be used by persons aged 16 and older. We do not seek to collect personal data on persons under the age of 16. No information should be provided on our website by persons younger than 16 years of age. If such a person submits personal data via this website, we shall

delete that information as soon as we are made aware of their age and thereafter shall not use it for any purpose.

Prevailing version

If this Privacy Policy is translated into any other language, and there is any inconsistency or conflict between the English and translated versions of this Privacy Policy, the English version shall prevail.

Contact Us

If you have any questions or concerns about our use of your personal data, please contact us using the following details:
By Email: support@gn.org