

# Privacy Policy

Last Updated: 28.01.2025

This Privacy Policy, as amended or otherwise changed from time to time (the "Privacy Policy" or "Policy"), explains the manner in which GalaxyLink OÜ, registry code 17153624, Harju maakond, Tallinn, Kesklinna linnaosa, Tornimäe tn 5, 10145 (hereinafter "GalaxyLink OÜ" or the "Company") maintains and discloses user information obtained through its website <https://en.galaxylink.gg/> (the "Site"). The terms "we," "us," and "our" refer to the Company. By using the Site, you ("User") consent to the data practices prescribed in this Privacy Policy.

Your Personal Data is processed under this Privacy Policy and in accordance with applicable legislation, including the General Data Protection Regulation (2016/679) ("GDPR") and the applicable national data protection laws ("Data Protection Law").

The Company acts as data controllers of your Personal Data.

On occasion, the Company may revise this Privacy Policy to reflect changes in the law, our personal data collection and use practices, the features on the Site, or advances in technology. If material changes are made to this Privacy Policy, the changes will be prominently posted on the Site.

## 1. What if I do not want to accept this Privacy Policy?

By using this Site, you signify your acceptance of this Policy. If you do not agree to this Policy, please do not use our Site. Your continued use of the Site following the posting of changes to this Policy will be deemed as your acceptance of those changes.

In case you disclose any Personal Data regarding any third person (e.g. your employee, management board member, co-worker, contracting party, etc.) to us, you are obliged to refer them to this Policy.

## 2. What information does the Company collect?

### 2.1. We collect Personal Data and Anonymous Data, as described below.

We may collect Personal Data from you, such as:

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### 2.2. If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.

2.3. Some information is collected automatically by our servers:

- Our servers (which may be hosted by a third-party service provider) collect information from you, including your browser type, operating system, Internet Protocol ("IP") address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit.
- As is true of most websites, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider ("ISP"), referring/exit pages, operating system, date/time stamp, and clickstream data.
- Like many online services, we use cookies to collect information. "Cookies" are small pieces of information that a website sends to your computer's hard drive while you are viewing the website.
- We retain information on your behalf, such as transactional data and other session data linked to your account.

2.4. We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

### 3. How does the Company use the information it collects?

3.1. In general, Personal Data you submit is necessary for contacting you in the context of the delivery of products or services and administering such products and services. Also, we use your Personal Data in the following ways:

- provide improved administration of Site and services
- improve the quality of experience when interacting with Site and services
- facilitate the creation of and secure account on network

3.2. The Company does not sell user and/or Anonymous Data to any third party.

3.3. Marketing and newsletter subscriptions. We collect information about your behaviour within the application to offer you interesting information and offers regarding our services and products. This information includes your profile information and user status. This information is processed automatically and you as a user will notice it by seeing more relevant content when signed in. We do not share this information with third parties. The processing of such personal data is based on our legitimate interest to develop and promote our services and products. If you have subscribed to our mailing list, we will send you information on our new activities, events, and products. We can also send special offers directed to a special user group, users of a certain region, etc. Adding you to our

mailing lists is based on your consent. You may also unsubscribe from the mailing list anytime by clicking the unsubscribe link at the bottom of each message.

- 3.4. Customer support. In case you need to contact our customer support, our support personnel will handle your contact information and the contents of your communication. Please do not share any sensitive data in your communication with our customer support. You can contact our customer support through various means. Depending on the means of communication you choose, we'll process the following contact details: - Your IP address (chat support) - Phone number (phone support, SMS support) - Email (email support) - User ID of an instant messaging app (QR code, support through an instant messaging app). We keep a record of the contents of the support tickets to make sure that you receive quality service and to develop our products and services. If you contact us by calling our support number, please note that we also record the phone calls for the same purposes. The processing of your personal data in connection with your communication with our customer service is based on the service agreement between you and the Company as well as our legitimate interest to follow up on the quality of our customer service, to verify the actions taken based on your request and to develop our service in the future.

## 4. **How does the Company share my Personal Data?**

It may be necessary to disclose your information to comply with any law, court orders, or government request, defend against claims, investigate or bring legal action against illegal or suspected illegal activities, enforce our Terms, or protect the rights, safety, and security of the Company, our users, or the public.

We may share your Personal Data with third-party service providers to provide you with the services that we offer you through our Site. These third-party service providers are required not to use your Personal Data other than to provide the services requested by you.

Other than as stated in this Privacy Policy, the Company does not disclose any of your personal information to third parties unless required to do so by law enforcement, court order, or in compliance with legal reporting obligations.

All third-party service providers that we share your data with shall be requested to only process your data in accordance with instructions from us and comply fully with this Privacy Policy, any applicable data protection laws and any other appropriate confidentiality and security measures. We may also share your personal data with competent authorities when this is necessary to comply with a legal obligation, court order or comparable official order issued by an authorized authority.

We may share some or all of your Personal Data in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event

of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset.

If another company acquires our company, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.

The Site may contain links to other third-party websites which are regulated by their own privacy policies. The Company is not responsible for the privacy policies of these third-party websites even if they were accessed using the links from our site.

## **5. How long do we store your personal data?**

We keep the data you have provided to us on your user account for the whole period of your customer relationship and as long as it is necessary with regard to the purposes of the processing described above.

## **6. What legal rights do you have in relation to your information?**

**6.1.** Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

**6.2.** You also have the right to lodge a complaint with a Data Protection Authority (“DPA”) if you think that your Personal Data is being processed incorrectly or your rights have been violated by the Company.

## **7. No fee is usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. Please note that in certain circumstances it may be still lawful for us to continue processing your information even where you have withdrawn your consent if one of the other legal bases is applicable.

## 8. **How can you send requests regarding your information?**

You can make a request regarding your information by emailing [support@galaxylink.gg](mailto:support@galaxylink.gg).

Unless you have made a corresponding request, we will retain your information for as long as your account has not been closed or as needed to provide you access to your account.

If you wish to close your account, please choose "Close my Account" in Settings by logging in to personal Account. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our Terms.

## 9. **Where do we store your Personal Data?**

The information we collect is primarily stored on secure servers . We will take all steps reasonably necessary to ensure that personal information is treated securely and in accordance with this Privacy Policy and that any third parties that we share your information with are bound to employ similar organizational and technical measures to ensure your information's security.

## 10. **What security precautions does the Company take to protect me?**

We take the protection of your personal information seriously. We use industry-standard data encryption technology and have implemented restrictions related to the storage of and the ability to access your personal information. However, despite all of our efforts, please

note that no transmission over the Internet or method of electronic storage can not be guaranteed to be 100% secure.

## 11. **Contact us**

If you have any questions about our Privacy Policy as outlined above, please contact us at [support@galaxylink.gg](mailto:support@galaxylink.gg)