



DMARKET APPLICATION PRIVACY POLICY

Last updated: 12.12.2018

SECTION 1. PURPOSE OF THIS POLICY

At DMarket, we are committed to keeping Your information safe and secure. Please read the following Policy so that You understand Your rights in relation to this information, including how Your information will be collected, stored, used and processed.

In providing You with our Application, we naturally collect information about You. This Privacy Policy ("**Privacy Policy**") sets out what we collect, how we use, how we store that information, who we might share it with, and the steps we take to make sure it stays private and secure.

This Privacy Policy is inalienable part of DMarket Application Terms of Use (hereinafter referred to as the "Terms of Use"), as amended from time to time. The terms and definitions referred to in this Privacy Policy are specified in the Terms of Use.

Please read the following information carefully to understand our practices regarding Your information and how we will use it. By continuing to use our Application, you acknowledge that You have read, understood and accepted the information described in this Privacy Policy. If any User does not agree with this Privacy Policy in general or any part of it, such User should not access or use the Application.

If You agree with this Privacy Policy, you must click on the respective button suggested to You.

SECTION 2. COLLECTION, PROCESSING AND USE OF YOUR INFORMATION

2.1. Information we collect when You access the Application

When You visit the Application, we collect the information sent to us by Your mobile or other access device. This information includes:

- Your IP address;
- Device information including, but not limited to, identifier, name, and type of operating system;
- Mobile network information;
- Standard web information, such as Your browser type and the content You access in our Application.

We collect this information in order to:

- Administer our Application, personalize our Application for You;
- Monitor and analyze trends, usage and activity in connection with our Application and services and provide third parties with aggregated and anonymized statistical information about our Users;
- Prevent, deter and investigate violation of this Privacy Policy and/or our Application or any fraud and other illegal activities.

When You access the Application or use our Service we may place small data files called cookies on Your computer or other device. We use these technologies to recognize You as our User, customize our Application for You and to monitor usage of our Application. See Section 3 of this Privacy Policy for more information.

2.2. Information We collect when You use the Application

When you create the Application Account, in addition to the information collected when You access our Application, we also collect Your email.

We collect this information to:

- Verify Your identity;
- Administer our Application and provide Services to You;
- Personalize our Application for You;
- Send You technical notices, support, administrative and marketing messages;
- Communicate with You about products, Services, promotions, events and other news and information we think will be of interest to You.

2.3. Information we might collect when You perform transactions through the Application

Notwithstanding the provisions of Section 6. of the Terms of Use (Deposit and Withdrawal Rules), in certain cases when You want to perform certain transactions using in-app currency (DMC) in the Application (funds deposit or withdrawal), You might be required to go through the KYC (Know-Your-Client)

procedure, during which we collect from You the following information and documents:

- Your first and last name;
- Your date of birth;
- Your document ID number;
- Country, city, street and postal code of Your residence;
- Copy of Your ID document, containing valid identification information about You;
- Copy of You, holding Your ID document;
- Copy of Your payment order document (utility bill, bank documents, etc.).

We collect this information to:

- Verify Your identity;
- Follow international anti-money-laundering and KYC rules and practices;
- Prevent any fraud or illegal activities;
- Follow requirements on person identification, established by Payment processors;
- Administer our Application and provide Services to You.

We may use Your personal data and other information We collect to detect, investigate and prevent fraudulent transactions and other illegal activities, develop new products and services and to verify compliance with the Terms of Use.

If You do not provide us with any of the requested personal data (if required for certain transactions), You may not be able to use the Application properly.

We may refuse You access to our Service and Application should we, in good faith, have doubts as to validity or authenticity of any personal data You provide.

2.4. Location Data

When You use a location-enabled device to access our Application and Services, we may collect geographical location data or use various means to determine the location, such as sensor data from Your device that may, for instance, provide data on nearby cell towers and wi-fi access spots.

2.5. Notice to parents

We will not knowingly collect personally identifiable information from any person under the age of 13. DMarket encourages parents to instruct their children to never give out personal information when online. Parents who are concerned about the transfer of personal information from their children may contact us by email as specified in "Contact" section of this Privacy Policy.

SECTION 3. COOKIES

We use cookies and other similar technologies (e.g. web beacons, Flash cookies, etc.) (“Cookies”) to enhance Your experience using the Application. Cookies are small text files that are placed on Your computer by Applications that You visit. They are widely used in order to make Applications work, or work more efficiently, and to deliver a better and more personalized Service.

Cookies may be either «persistent» Cookies or «session» Cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

We use the following Cookies:

- **Strictly necessary Cookies.** These are Cookies that are required for the operation of the Application.
- **Analytical/performance Cookies.** They allow us to recognize and count the number of Users and to see how Users move around the Application when they are using it. This helps us to improve the way the Application works. We use Google Analytics, Hotjar and Yandex Metrica which are web analytics tools that help us understand how Users engage with the Application. Like many services, Google Analytics, Hotjar and Yandex Metrica use first-party cookies to track User interactions as in our case, where they are used to collect information about how Users use our Application and how they use it. This information is used to compile reports and to help us improve our Application. The reports disclose Application trends without identifying individual visitors. You can opt out of Google Analytics, Hotjar and Yandex Metrica without affecting how You visit our Application – for more information on opting out of being tracked by Google Analytics across all Applications You use, visit this [Google page](#). For more information on opting out of being tracked by Hotjar across all Applications You use, visit this [Hotjar page](#) and by Yandex Metrica across all Applications You use, visit this [Yandex page](#).
- **Functionality Cookies.** These are used to recognize You when You return to the Application. This enables us to personalize our content for You (for example, Your choice of language).

You can find more information about Cookies and how to manage them at <http://www.allaboutcookies.org/>. You may control the use of Cookies within Your internet browsers’ settings. If You reject or delete certain Cookies, be aware that the performance of the related features and functions of our Application and Services may be impaired.

SECTION 4. HOW WE MIGHT SHARE YOUR PERSONAL DATA

4.1. We may share Your personal data where:

- We need to in order to operate our Application and Service.
- We need in order to perform Your transactions on the Application or through partner Payment processors.
- We have a public or legal duty to do so (e.g. to assist with detecting fraud, tax evasion, financial crime prevention, regulatory reporting, litigation or defending legal rights and property, including our own).
- We have asked for Your permission to share Your information and You have agreed.

4.2. We may share Your personal data and information with:

- Our subsidiary and affiliated companies if this is required for duly performance of our obligations before the Users and provision of Services to You;
- Companies that we plan to merge with or be acquired by (should such a combination occur, we will notify You and will require that the newly combined entity follow these terms with respect to Your personal data);
- Law enforcement, government officials, or other third parties when we are compelled to do so by a subpoena, court order, or similar legal procedure; or we believe in good faith that the disclosure of personal data is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of any of our policies;
- Our vendors and agents including hosting providers, hired by us to provide Services, game developers;
- Payment processors (for the purpose of Your transactions performance when using the Application).

4.3. What we will not use Your personal data for:

- We will not provide Your personal data to any other Application users or third parties other than described in this Privacy Policy without notifying You first.
- We will not sell or rent Your personal data to third parties, other than as described in this Privacy Policy without notifying You first.

4.4. Links to third party applications or services

- Our Application may, from time to time, contain links to and from the applications of our partner networks, game developers, advertisers, Payment processors, etc.
- If You follow a link to any of these applications or services, please note that these applications and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any information, including personal data that may be collected through these applications or services, such as contact and location data. Please check these policies before You submit any information or

personal data to these applications or use these services.

- Our Application may also contain services of/from our partners, vendors, game developers.
- In order to provide Services to You and/or for the purpose of duly transactions performance in the Application, when You use our Application, it, may, from time to time, get and/or collect User's personal data, such as Your name (username, login) and/or other identifiers from our partners', vendors', game developers' services. We will not provide this data to any other Application users or third parties other than described in this Privacy Policy without notifying You first. Please note that these services that our Application may contain have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any information, including personal data that may be collected through these services, such as contact and location data. Please check policies of such services before using these services.
- For the purpose of duly transactions performance in the Application Users might be required to provide their personal and payment processing data (such as name, surname, address, copies of ID cards or other identifying documents, residence place confirmation documents, credit card identification data) to the respective Payment processor, including the consent for processing these data by the payment services in order to carry out the requested transactions. Please note that the respective personal and payment processing data provided by You to a third party Payment processor shall be collected, stored and processed solely by the respective Payment processor and not subject to this Privacy Policy. You should read carefully and follow the applicable privacy policies of the Payment processor.

SECTION 5. HOW WE KEEP YOUR INFORMATION SAFE

We protect Your information using security standards such as firewalls and data encryption, physical access controls to our premises and information access authorization controls. We also authorize access to Your information only for those employees or contractors who require it to fulfill their job or service responsibilities.

Please note that transmission of data or information (including communications by e-mail) over the internet or other publicly accessible networks is not one hundred percent secure. Please note that we are not liable for the security of any data you are transmitting over the internet.

SECTION 6. HOW WE TRANSFER YOUR INFORMATION

We store and process Your information using cloud services in various jurisdictions, including the United States of America. As such, the information that we collect from You may be transferred to, and stored in various jurisdictions outside of Your country of residence and outside the European Economic Area («EEA»). The laws on processing such information, including

where such information is classed as “personal data”, in these locations may be less stringent than in Your country. It may also be processed by staff operating outside of Your country or the EEA who work for us, for one of our service providers or one of our business partners. By submitting Your information, You agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that Your information is treated securely and in accordance with this Privacy Policy.

SECTION 7. YOUR RIGHTS

You may access, review and edit Your personal data at any time by contacting our support team. You may be requested by our team to provide the respective confirmation documents in case of your personal data information change.

European users have the right under applicable privacy laws to ask us to provide details of the personal data we hold about them or in certain circumstances, may request we delete their personal data.

To exercise the abovementioned rights, please contact us by email as specified in “Contact” section of this Privacy Policy.

A request on access, review, provision of details, amendment or deletion of personal data is usually processed within 72 hours from the moment we receive it. However, due to technical reasons delays are possible, and in such case we shall process the respective request within a reasonable term.

SECTION 8. UPDATES OR AMENDMENTS TO THIS POLICY

We reserve the right to modify or amend this Privacy Policy at our discretion. Any changes can be viewed in the “Last Updated” field above, so please check the section regularly.

If we make any material changes, we will post the new policy in the Application, with a new effective date.

SECTION 9. CONTACT

If You have any questions concerning this Privacy Policy or want to exercise any of Your rights as specified herein, please feel free to contact us by email at support@dmarket.com.

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