

PRIVACY POLICY

The Administrator reasserts its commitment to protecting the Users' data. Therefore, and in compliance with the European General Data Protection Regulation (GDPR – Regulation (EU) 2016/679 of the European Parliament and Council, of the 27th of April 2016), on the protection of natural persons regarding the processing of personal data and on the free movement of such data, hereinafter referred to as the “GDPR”), new technical and organization measures to protect the Users' data were implemented and this Privacy Policy has been reviewed.

Here is a brief overview of the changes introduced:

- increased transparency regarding the collection and use of data was added;
- information on how the Users control their data was provided;
- instructions on how Users can exercise their privacy rights were developed;
- the Administrator's practices with respect to data deletion and retention were clarified.

The new wording of this text came into effect on May 25th, 2018.

This Privacy Policy aims at identifying measures of privacy protection regarding the processing of personal data and on the free movement of such data, including personalised data management tools provided by the Users.

1. In this Privacy Policy, we use various defined terms. You will know they are defined because they begin with a capital letter.

1.1. **Administrator, Website Administrator** - the controller of Users' personal data in accordance with the Privacy Policy; owner of the Website and the entity responsible for proper functioning of the Website, the company BENEFIT PTE. LTD., a private limited company, duly incorporated and organized under the laws of Singapore, with registered office in Singapore at 80 Robinson Road #02-00, Singapore (068898), registered with the Accounting and Corporate Regulatory Authority in Singapore, registration number 20161260 IN. Personal data or other information provided by the User to the Administrator may be transferred and stored in the territory of the European Union and in the territory of the Administrator. The User shall expressly consent to the transmission and storage by the Administrator of such information in the abovementioned locations according to this Privacy Policy in particular by clicking checkbox with appropriate statement.

1.2. **Representative** - the Administrator has designated the following entity having in place equally sufficient safeguards for the protection of personal data as its representative in the European Union and other regions governed by the GDPR for purposes of the EU data protection laws Users in all European countries may address the Representative in all cases relating to the collection and processing of their personal data by the Administrator, including in particular to exercise their rights as specified in section 3 below

1.3. **Advertiser** - any person registered in the Administrator's Website in the "Advertiser" tab.

1.4. **Affiliate Programme** - a programme run by the Administrator, described in details in Affiliate Programme Rules and Regulations for Affiliates, published in the "Regulations" tab in the Website.

1.5. **Privacy Policy** - these Privacy Policy in its entirety; a set of rules for the processing of personal data and protection of privacy applicable to Website Users, presented in detail on the Website under the "Privacy Policy" tab.

1.6. **Publisher** - any person registered in the Administrator's Website in the "Publisher" tab.

1.7. **User**- any person accessing or using the Website, including Advertiser and Publishers and any person who has written to us using contact details from "Contact" tab;

1.8. **Website** - the website registered in this domain directaffiliate.com.

2. This Privacy Policy defines the terms of collection, processing and protection of personal data provided by the Users during or in relation to the use of the Website, based on the use of cookie files on Users' computers, as well as collection and processing of User data provided by the Users for the purpose of running Affiliate Programme, for statistical purposes, and on other means of data processing - in particular on collection, storage, analysis, amendment, modification, sharing and other uses of data. The Users choosing to restrict the collection or use of their personal information have the right to do so by (1) requesting access to details of their personal information held by the Administrator, (2) requesting details of their personal information to be deleted from the Administrator systems, (3) requesting the information held to be corrected in case the Users believe the data is incorrect or incomplete. Please use the e-mail address provided in the "Contact Us" section of the Website. The Users from the European Union or other regions governed by the GDPR may choose to contact the Representative for the above or any other issues related to their data processing.
3. Any personal data is collected on a fully voluntary basis and is used solely by the owner and/or the Administrator, however, this data is necessary for the use of the Website, and it is impossible to use the Website if this data is not provided.
4. While using the Website, information sent by the web browser and included in system logs is automatically collected by servers. Such information may contain various data, e.g. e-mail address, IP address, browser type, address of the website visited immediately before accessing the Website, time of visit to the Website and other statistical data. The Website Administrator uses such data to ensure high-quality of services, as well as for technical and statistical purposes.
5. The Administrator maintains the personal database in conformity with the laws applicable for Administrator's registered seat and in accordance with the rules of social conduct. We take all reasonable steps, including implementing reasonable technical and organizational measures, to protect the confidentiality and security of your personal data collected.
6. The collected data is used only for:
 - 6.1 running Affiliate Programme;

- 6.2 identification of Users after using contact details from section “Contact us” by them and for further communication with the Users;
 - 6.3 upon the User’s approval for marketing of own services and for the purpose of sending Users newsletters and other promotional and advertising materials. At any time, Users may stipulate that they do not agree to receiving commercial information – by clicking the link provided at the end of a message.
7. The collected data may include:
 - 7.1 regarding Advertiser - full name, e-mail address, Skype ID and any data shared by the Advertisers themselves;
 - 7.2 regarding Publisher - nickname, e-mail address, Skype ID, phone number, password to log in the Website and any data shared by the Publishers themselves;
 - 7.3 Users who contacted us through “Contact us” section - full name, e-mail address, Skype ID and any data shared by the Users themselves.
 8. Each User has the rights vested to him by the relevant data protection act. In order to access or remove their data, the Users shall contact the Administrator of the Website.
 9. The Website may also use Google Analytics (and similar tools), i.e. the services enabling remarketing with Google Analytics, Google display network impression reporting, Google Analytics demographics and interest reporting and integrated services that require Google Analytics to collect data for advertising purposes, including the collection of data via advertising cookies and identifiers as well as the services enabling analyses of visits to sites rendered by Google, Inc. (“Google”) or other entities. Google Analytics also uses “cookies”. Google’s ability to disclose information obtained this way to third persons is restricted to situations where it is obliged to do so to satisfy the law in force.
 10. The Website’s Administrator works with third parties such as Facebook, Twitter, LinkedIn and other similar platforms (the “Socialmedia”) and uses „cookies”, pixels, web beacons, and other storage technologies to store information on Users’ preferences and to collect user behavioral data through the Website, target ads to the Users based on their activity on the Website or to measure ad conversions or retarget advertisements on the Socialmedia, track actions taken on the Website. Such text files are stored in the Users’ computers to identify them in a way required to enable some operations. The files contain: Users’ personal preferences and settings and suggestions for automatic fillings of web forms used, among others, to remember the data necessary for the User to log in. In particular, one category of cookies is used:
 - 10.1 Action Cookies - files stored to register Users’ activity on the Website. They provide information on most frequently visited websites, most popular functionalities of the Website and on the effectiveness of marketing materials on the Website. Action cookies provide statistical data allowing optimization of the Website functionality through observation of, for instance, the jump off rate i.e. information on the moment when use of the Website was terminated by the User. Acceptance of cookies by the User through the applicable browser settings is a prerequisite condition for their use.

11. In the event the User does not agree to use abovementioned cookies, pixels, web beacons, and other storage technologies the use of the Website may be inhibited. Users can at any time adjust the cookie settings in their browser. Such settings are usually in the preferences menu of the browser.
12. The Users may withdraw their consent to the processing and storage of their personal data by contacting the Administrator. The Users from the European Union or other regions governed by the GDPR may choose to contact the Representative for the above.
13. Fighting any forms of identity theft, illegal acquiring of information and illicit practices defined as „phishing” is one of the highest priorities for the owner and the Administrator. Therefore any data shared by the Users is collected pursuant to data safety rules.
14. The Administrator may use automated decision making in processing personal information. The User from the European Union or other regions governed by the GDPR can request a manual review of the accuracy of an automated decision.
15. The Administrator has the right to send unsolicited communication to the Users. Such communication may include information linked directly to the functioning of the Website (e.g. changes in Website functionalities), or non-commercial mail (e.g. wishes, system notifications). The Users have the right to reserve the lack of consent to provision of such information, by clicking on the link available at the bottom of such communication.
16. There may be links on the Website (e.g. in the form of third party logotypes) which, when clicked on, direct the User to an external website. The fact of using any such referrals shall not be equated with any kind of connection between the Administrator and the entity running the external website. The Administrator shall not in any case be responsible for such redirections nor for the content of privacy policies and safety rules applied on such websites, nor for cookies used when viewing such websites. Persons using this kind of redirections are advised to read and acknowledge the relevant documents available on such sites.
17. Personal data is protected by law and the law provides all Users with rights related to their personal data. The Users can exercise their rights by submitting a request through the “Contact” form on the Website. These rights can be exercised at any point. An overview of these rights related to the Users from the European Union or other regions governed by the GDPR can be found below:
 - 17.1. the right to be informed- the Users have the right to be provided with clear, transparent and easily understandable information about how their data is used;
 - 17.2 the right to access and rectification - the Users have the right to access, correct or update their personal data at any time by writing through the “Contact” section;
 - 17.3 the right to data portability- the personal data provided by Users portable. This means it can be moved, copied or transmitted electronically and the Users

can receive their personal data (concerning them only) in a structured, commonly used and machine-readable format, and have the right to transit this data to another data controller;

17.4 the right to be forgotten - under certain circumstances, the Users have right to request that the Administrator deletes their data by making a request through the “Contact” form. The Administrator will take reasonable steps to respond to the User’s request in accordance with legal requirements. If the collected personal data is no longer needed for any purposes and the Administrator is not required by law to retain it, the Administrator will delete, destroy or permanently de-identify it;

17.5 the right to restrict processing - under certain circumstances, the Users have the right to restrict the processing of their personal data;

17.6 the right to object -under certain circumstances, the Users have the right to object to certain types of processing, (i.e., receiving emails notifying the Users). The Administrator will inform the Users in this Privacy Policy if the Administrator intends to use the Users’ data for such purposes or if the Administrator intends to disclose the Users’ information to any third party for such purposes;

17.7 the right to lodge a complaint with a supervisory authority- the Users have the right to lodge a complaint directly with any local authority that supervises processing of personal data about how the Administrator process their personal data;

17.8 rights related to automated decision-making - the Users have the right not to be subject to a decision which is based solely on automated processing and which produces legal or other significant effects on them. In particular, the Users have the right:

- a) to obtain human intervention;
- b) to express point of view;
- c) to obtain an explanation of the decision reached after an assessment; and
- d) to challenge such a decision.

18. Personal data or other information provided by the User to the Administrator may be transferred and stored at any location in the world, in particular in the territory of the European Union or in the territory located outside of the European Economic Area (the EEA). The Administrator will only transfer the data of the Users from the European Union or other regions governed by the GDPR on the basis of the recipient fulfilling the applicable requirements and if:

18.1. the country in question ensures an adequate level of protection; **or**

18.2. the User expressly consents to the restricted transfer and storage User’s personal data in the abovementioned locations according to Art. 49 Section 1 a) GDPR, such consent shall include the following information: the identity of the receiver; the country or countries to which the data is to be transferred; purpose of a restricted transfer; the type of data; the User’s right to withdraw consent; and the possible risks involved in making a transfer to a country which

does not provide adequate protection for personal data and without any other [appropriate safeguards](#) in place. In such case the Administrator ensures adequate protection in particular technical, physical and organisational of the Users' personal data in accordance with applicable data protection law. The abovementioned expressly consent shall be made in particular by clicking checkbox with appropriate statement.

19. The Administrator has the right to introduce amendments or clarifications into this Privacy Policy. Any such amendments will be published on the Website under the tab „Privacy Policy” and are effective from the moment they are published, therefore Users are recommended to visit the Website and observe updates of the rules on a regular basis.
20. Before visiting and using this Website the Users shall accept the terms of this Privacy Policy.