

PRIVACY POLICY

Identification and contact details of the responsible party

This Privacy Policy provides information on the use that SECONDWORLD OÜ (hereinafter, the “**Company**”) will make of your personal data as a user of the website (the “**Website**”).

The purpose of this Privacy Policy is to provide information on the rights that are granted to you in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

If you have any questions regarding the processing of your personal data, please contact the Company at the address provided in <https://secondworld.io/>

Necessary and updated information

The information you provide through the forms on the website must be truthful. Thus, in order to ensure that the information provided is always up to date and does not contain errors, you must inform the Company as soon as possible of any modifications or corrections to your personal data that may occur, by sending an e-mail to the address provided in the Website.

Purposes of the processing, legal basis of the processing and period of conservation of personal data

1. Purposes of processing

The Company will process your personal data using the form that the Company places at your disposal on this Website so that you can make requests for information, queries, or complaints. The Company will collect and process your personal data to be able to manage your request, as well as to carry out all the formalities and/or procedures necessary to process the aforementioned request.

2. Legal basis for processing

Your personal data may be processed in accordance with the consent that you have given in the form that the Company places at your disposal on this Website. The aforementioned consent may be withdrawn whenever you wish, although, in this case, this withdrawal would make it impossible to continue processing your application.

3. Storage period of personal data

In general, your personal data will be kept for the period necessary to achieve the purposes set out in this Privacy Policy. Subsequently, your personal data will be kept for the period necessary until the prescription of the legal responsibilities derived from the treatment of which it is treated, in accordance with the applicable legislation.

Categories of recipients

Your personal data may be communicated to the following categories of recipients:

- a) The Company service providers who have to process their personal data in relation to the purpose for which it is processed, which will be carried out in accordance with the Company's instructions and in accordance with this Privacy Policy, and any other appropriate security and confidentiality measures established by the Company; and
- b) Third parties that have no relationship with the Company, if the Company identifies, in good faith, the need to make the communication in order to: (i) comply with any law, regulation, legal procedure or governmental requirement with executive force, (ii) enforce the terms and conditions of the product and/or service purchased, including the investigation of possible violations, and (iii) detect, prevent or otherwise address fraud, security or other technical problems.

The Company does not carry out international transfers of personal data in accordance with the provisions of General Data Protection Regulation.

Exercise of your rights

We inform you that you may exercise the following rights:

- a) Right of access to your personal data in order to know which data are being processed and the processing operations carried out on them;
- b) The right to rectify any inaccurate personal data;
- c) The right to suppression of their personal data, whenever possible;
- d) The right to request the limitation of the processing of their personal data when the accuracy, legality or necessity of the data processing is in doubt, in which case we may keep the personal data for the exercise or defence of claims;
- e) The right to the portability of their personal data, in cases where the legal basis that enables us to process them is a contractual relationship or consent;
- f) The right to oppose the processing of their personal data, in cases where the legal basis for processing is legitimate interest. In this case, we will stop processing your

personal data unless we have an overriding legitimate interest, or for the formulation, exercise or defence of claims;

g) The right to revoke their consent at any time.

You may exercise your rights at any time and free of charge by sending an e-mail to the Company indicating the right you wish to exercise and your identification details.

If you consider that we have not treated your personal data adequately, we inform you that you have the right to file a complaint with the Estonian Data Protection Inspectorate if you consider that there has been an infringement of the legislation on data protection regarding the treatment of your personal data.

Cookies

The Company will only use data storage and retrieval devices (“**Cookies**”) when the user has given his/her prior consent, in accordance with what is indicated on the pop-up window of the user's browser when he/she accesses the Website for the first time and under the other terms and conditions indicated in the Company Cookies Policy that all users must be aware of.

Security measures

The Company adopts the levels of security required by the General Data Protection Regulation, appropriate to the nature of the data being processed at any time. Notwithstanding the above, technical security in a medium such as the Internet is not impregnable and there may be fraudulent actions by third parties, although the Company has all the means at its disposal to avoid such actions.

Minors

Minors may not use the services available through the Website without the prior authorisation of their parents, guardians, or legal representatives, who will be solely responsible for all actions carried out through the Website by the minors in their care, including the completion of forms with the personal data of said minors.

Changes to the Privacy Policy

We may update the Privacy Policy of our Website. Therefore, we recommend that you review this policy every time you access our Website in order to be adequately informed.