

INTRODUCTION

At Digital Spearhead we respect your privacy and we understand the important of information provided to us. This Privacy Policy provides important information which are integral part to the Terms of Use of Digital Spearhead Ltd (hereinafter the “Digital Spearhead”, “we” or “us”) services. Data protection is important to us and this Privacy Policy provides important information about how Digital Spearhead and its worldwide affiliate companies and subsidiaries handle personal information.

This Privacy Policy applies to any Digital Spearhead website, application, product, software or service that links to it (collectively, our “Services”).

Please read this Privacy Policy carefully and contact us in case you have any questions about our privacy practices or your personal information choices. We reserve the right to amend this Privacy Policy at any time by posting the new version. It is important that you check back for updates to this Privacy Policy. If we make material changes to this Privacy Policy, we will post the updated policy here, along with its effective date, and notify you by email or by means of a notice on our Website.

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1. USE OF WEBSITE AND PERSONAL INFORMATION

Digital Spearhead is committed to the responsible handling and protection of personal information.

Personal information means any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

To use our Services, you must register and thus save your personal information (name, email address, phone number etc.). We collect, use, disclose, transfer and store personal information when needed to help us manage our contractual relationship with you and to provide our Services as well as for our operational and business purposes. The registration form shall include a statement allowing you to accept or reject that your personal data is used for marketing or commercial purposes by Digital Spearhead Services or by third parties and / or sold to third parties. If you use the services of partner sites and choose to disclose your personal data, you are informed that the collection and use of your data by these sites is subject to their own conditions on the processing of personal data. We are not responsible for how partner’s sites use personal data.

2. USE OF YOUR PERSONAL DATA

We may disclose your personal data to any of our group companies, to third parties who process your personal data on our behalf, to any third party to whom we assign any of our rights or obligations or to any government, regulatory agency, enforcement or exchange body or court, as described below:

Internal - We may process and distribute personal data internally in order to conduct our business operations, always in line with our internal privacy policies and procedures. In addition, we may distribute information to our intra-group related businesses (within or outside the EEA) if necessary, for the provision of the Services, e.g. administration, customer and technical support and marketing. All of our employees and related companies are bound to follow our personal data privacy policies and procedures when processing such personal data.

Third Parties - Third party disclosures may include sharing such personal data with third party companies that provide us services, which include, inter alia, professional, legal, marketing and/or accounting services to us and/or service providers. Third Party companies that assist us in providing services are required to maintain the confidentiality of such data to the extent they receive it and to use the personal data only in the course of providing such services and only for the purposes dictated by us. Our Third Party providers are not permitted to share or use personal data we distribute to them for any other purpose than their contractual obligation with us.

Regulators - We may also disclose your personal data to any government, regulatory agency, enforcement or exchange body or court where we are required to do so by applicable Laws and Regulations or at their request. This may include disclosing personal information in order to cooperate with regulatory authorities and law enforcement agencies, as may be necessary to protect our rights and/or property.

In addition we may use information about you from your activities on the Services offered to resolve any disputes or resolve any issues that may arise in the opportunity to use our services. We recommend that you accept that we may use your personal data (email address, phone number) as part of our marketing and promotional campaigns, but also for statistical purposes on the use of the Services. Our marketing and statistical studies are designed to improve and personalize the services offered. You acknowledge and agree that your data may optionally be transmitted to third-party subcontractors involved in providing marketing and/or services offered. If you use the services of a partner site or advertiser, it may be required to provide us with information about its transactions with you.

3. HOW LONG WE KEEP YOUR PERSONAL DATA

We retain personal information for as long as we reasonably require it for legal or business purposes. In determining data retention periods, we take into consideration local applicable laws, contractual obligations and the expectations and requirements of our Customers. When information is no longer needed, we proceed with destruction procedures.

4. RIGHTS RELATING TO YOUR PERSONAL DATA

Under data protection laws, in certain circumstances you have the below rights in relation to your personal data:

Right to access your personal data - You may request from us to receive a copy of the personal data we hold about you and check that we are lawfully processing it. The Company hereby reserves its right to charge a relevant fee for providing such record of personal data to the person requesting this, except where this is not allowed under local legislation.

Right to correction of the personal data in our records - You may request us to correct any incomplete or inaccurate data we hold about you, though we may need to verify the accuracy of the new data you provide to us.

Right to erasure of your personal data - You have the right to request that we erase or remove your personal data in certain circumstances. This applies where there is no good reason for us continuing to process it, or where you have successfully exercised your right to object to processing (as per below), or where you believe we may have processed your information unlawfully or where we are

required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Right to object to the processing of your personal data - Where we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object.

Right to request restriction of processing of your personal data - You have the right to request that we restrict and/or suspend our processing of your personal data in certain circumstances: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you prefer us to restrict our processing of it rather than erasing it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Right to request the transfer of your personal data to you or to a third party - Upon your request we can provide you with your personal data or provide these to a third party you have chosen.

Right to withdraw consent at any time - Where we have obtained your consent to process your personal data, you may withdraw your consent at any time. Note that this will not affect the lawfulness of any processing carried out before you withdraw your consent.

5. COOKIES

To improve our Website's performance and the users experience it delivers, we sometimes store small text files called "Cookies" on your computer, when you visit our Website.

Cookies are small pieces of data that are stored on your computer or mobile device when you visit a website.

Our Website uses cookies to help identify your computer so as to tailor your user experience. They are used to store bits of information about your interactions with the website, which the web server can use later when processing your sessions. The cookie is specific to you and it can be read by the web server (when interacting with it) or by programs on your computer.

In order for Cookies to be installed on your device you shall need to consent to the request on the pop-up banner once you enter the Website.

If you do not wish to receive cookies, you may from accepting the installation on the pop-up banner. However, this may impair the quality of the Services that are being provided to you through the Website.

If you choose to accept the installation of Cookies on your device then you can control and/or delete Cookies at any time and as you wish directly from within your own internet browser or mobile device. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work.

For further information about cookies and how to disable them, please refer to www.allaboutcookies.org

Types of Cookies:

There are various types of cookies needed to be used in order to enable the provision of the Services, which include, inter alia the below:

Necessary cookies which are absolutely essential to enable navigation through the Services. Without these cookies, essential security features cannot be activated and services you have asked for cannot be provided.

Performance cookies which are used to improve the use of the Services and the user-friendliness of a Website. They collect information such as the Internet browsers and operating systems used, the number of visits, average duration of visit, the domain name of the website previously visited and pages viewed. These cookies do not collect information that personally identifies you and only collect aggregated and anonymous information. You can delete or block these cookies, but if you do that some features of the website may not work as intended.

Functionality cookies which are used to remember choices or changes in choices you have requested, such as language preference, selections you have made as to text size, fonts and other selected features.

Marketing cookies used to evaluate performance of advertisements and visits on the Services.

Other types of Cookies or third-party tools:

Some of the services listed below may collect statistics in aggregated form and may not require your consent or may be managed directly by you – depending on how they are described – without the help of third parties.

If any third-party-operated services are listed among the tools below, these may be used to track your browsing habits, in addition to the information specified herein and without the owner's knowledge.

Interaction with external social networks and platforms: These services allow interaction with social networks or other external platforms directly from the pages of the Services; the interaction and information obtained are always subject to your privacy settings for each social network; if a service enabling interaction with social networks is installed it may still collect traffic data for the pages where the service is installed, even when you do not use it.

Google +1 button and social widgets (Google Inc.): The Google button and social widgets are services allowing interaction with the Google+ social network, provided by Google, Inc.

Personal data collected: Cookie and Usage data. Place of processing: USA

Facebook Like button and social widgets (Facebook, Inc.): The Facebook Like button and social widgets are services allowing interaction with the Facebook social network, provided by Facebook, Inc.

Personal data collected: Cookie and Usage data. Place of processing: USA

Tweet button and social widgets (Twitter, Inc.): The Tweet button and social widgets are services allowing interaction with the Twitter social network, provided by Twitter, Inc.

Personal data collected: Cookie and Usage data. Place of processing: USA

Linkedin button and social widgets (LinkedIn Corporation): The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network, provided by LinkedIn Corporation.

Personal data collected: Cookie and Usage data. Place of processing: USA

YouTube button and social widgets (YouTube Corporation): The YouTube button, video and social widgets are services allowing interaction with the Youtube social network, provided by YouTube, LLC.

Personal data collected: Cookie and Usage data. Place of processing: USA

Statistics: The services contained in this section are used to monitor and analyse traffic data and are used to keep track of your behaviour.

Google Analytics with anonymized IP (Google Inc.): Google Analytics is a web analytics service provided by Google Inc. Google uses personal data collected for the purpose of evaluating the use of this application, compile reports and share them with other services developed by Google. Google may use this personal information to contextualize and personalize the ads of its own advertising network.

This integration of Google Analytics makes anonymous your IP address. The anonymization shortening work within the confines of the EU Member States or other countries participating in the agreement on the European Economic Area, the IP address of the Users. Only in exceptional cases, the IP address will be sent to Google's servers and statements within the United States.

Personal data collected: Cookie and Usage data.

Place of treatment: USA

6. LINKS AND CONNECTIONS TO THIRD-PARTY SERVICES

The Website may contain links to websites operated by other parties. We provide the links for your convenience, but we do not review, control or monitor the privacy or other practices of websites operated by others. The privacy practices of these third parties are governed by the parties' own privacy statements. We are not responsible for the security or privacy of any information collected by these third parties or for your business dealings with them. You should review the privacy statements or policies applicable to these third-party services.

7. SECURITY

We take personal information security seriously and achieve protection through the use of appropriate technologies and procedures. Personal data is processed in a manner that ensures appropriate security and confidentiality, including preventing unauthorized access to or use of personal data. We shall protect all data from loss, misuse, unauthorized access or disclosure, alteration, or destruction

We maintain policies and procedures and have measures in place in order to ensure high levels of protection of personal data which include, inter alia, appropriate restrictions on permissions of access to personal information, controls and monitoring of storing and distribution of data.

All our employees and providers are required to follow our privacy and security policies and procedures. The Company is not responsible for the security and privacy of any Third Party and/or Social Networking services or any information collected by them.

8. HOW TO CONTACT US

Should you have any queries in relation to this Privacy Policy, your personal data held by us, or any other general questions in relation to Digital Spearhead and its Services, do not hesitate to contact us through the contact details provided on this Website. For any requests related to your personal information please feel free to contact us:

Email: info@dspearhead.com

This Privacy Policy was created on October 2019.