

Privacy Policy

This Privacy Policy (hereinafter “Policy”) describes how we deal with your “personal data” (that is, information about any identified or identifiable living persons, hereinafter also referred to as “data”). Please read on to find out what kinds of personal data we collect, how we use and protect it, to whom we disclose it and how you can access and rectify it or request that we stop processing it.

Affility LLC and its affiliates and subsidiaries (collectively referred to as “Affility”, “our”, “us” or “we”) respect your right to privacy, the present privacy policy governs how Affility deals with the personal data collected, stored and processed by us. The present policy complies with applicable laws for the protection of your privacy, including, without limitation, wherever applicable, the California Consumer Privacy Act (CCPA), the European Union General Data Protection Regulation (GDPR).

By using the Affility websites (hereinafter “Site”) and/or the Affility services (hereinafter “Services”), you accept this Policy, our terms of service and our cookie policy. Please do not use the Site and/or Services unless you have read this Policy, our Cookies policy and our terms of service. If you use the Site and/or the Services, we will assume that you do accept it.

Data Collection

What's personal data?

“Personal data” means any information that can either itself identify you as an individual (“Personally Identifying Information”) or that can be connected to you indirectly by linking it to Personally Identifying Information.

When do we collect your data?

We collect data about you directly from you and/or from third parties, to whom you have granted such consent, as well as automatically through your use of the Services:

When you access the Site or visit a page that integrates the Services: Our systems gather data that is automatically transmitted from the device(s) you use to access the Site or other sites integrating the Services, such as your IP address, unique device identifier, browser information, and system information (e.g. operating system).

When you communicate with our customer support team: If you initiate communication with our customer support team, you may be prompted to provide additional information about yourself. Additionally, our customer support team may contact you to request further proof of personal identity, such as a new or updated picture of a legal identification document in order to comply with our legal obligations.

Data Use

Affility collects personal information for the following reasons:

To offer the Services: We will use your personal data as necessary to provide the Services, including to the extent necessary to verify your identity, authenticate your access to a user account, and communicate with you about the Services.

To comply with our legal obligations

For our other legitimate interests: We may need to use your personal data in order to enforce our contracts and terms of service and monitor activity on the Site where you have given consent to it.

What data do we collect?

- Basic Account Data
- Affility may collect your IP address.

Other Data You Explicitly Submit

We will collect and process Personal Data whenever you explicitly provide it to us or send it as part of communication. This data includes:

- Information sent through customer support correspondence.
- Information you provide when you request information or support from us
- Your Use of the Affility Websites

Personal Data we collect may include, but is not limited to, browser and device information, data collected through automated electronic interactions and application usage data. Likewise, we will track your process across our websites and applications to verify that you are not a bot and to optimize our services.

Tracking Data and Cookies

We use "Cookies", which are text files placed on your computer, and similar technologies (e.g. web beacons, pixels, ad tags and device identifiers) to help us analyse how users use our services, as well as to improve the services we are offering, to improve marketing, analytics or website functionality. The use of Cookies is standard industry practice on the internet. Although most web browsers automatically accept cookies, the decision of whether to accept or not is yours. You may adjust your browser settings to prevent the reception of cookies, or to provide notification whenever a cookie is sent to you. You may refuse the use of cookies by selecting the appropriate settings on your browser. When you visit any of our services, our servers log your IP address, which is a number that is automatically assigned to the network your computer is part of.

Data Disclosure

If you access a third-party website, which is part of our Merchant Base, personal data may be collected by these third parties in accordance with their privacy policy. Please carefully review

such policies before proceeding with browsing. Your privacy is important to us so we have taken measures to ensure that all of the entities we share your personal data/information with, have implemented strong data privacy and data protection practices of a level comparable to that which we employ. Your personal data may be disclosed under the following circumstances:

When our related affiliates or subsidiaries require the data to help provide the Services: We have related affiliates and subsidiaries around the world that assist in providing the Services. We may provide your data to these affiliates or subsidiaries for any of the purposes we would ourselves use your data, including carrying out the transaction you requested, preventing fraud or illegal activity, and enforcing our terms and conditions. If we disclose your personal data to these affiliates or subsidiaries, their use of the personal data will subject them to this Policy.

When other third parties that provide us with ancillary services in order to facilitate the Services: This includes our server hosting providers and independent auditors whom we engage for the purposes of analysing our compliance with the law or relevant independent standards.

To the extent required by law: We will share your data with third parties to the extent we are required to do so by law. For example, we are required by law to undergo certain routine audits, which may require us to share your data with the third-party auditors we have engaged in relation to these requirements. Additionally, we may have to disclose your data when we receive a valid subpoena or other law enforcement request, or when the law requires us to affirmatively notify law enforcement in order to prevent harm or illegal activity. The necessity of all such disclosures will be determined in our sole discretion.

To the extent our legitimate interests require us to do so: We may transmit your data to our third-party partners for inclusion on their blacklists or lists of terminated merchants, or to help us engage in our fraud reduction efforts, to support our corporate governance activities, to facilitate the sale or other transfer of all or part of our business, or to protect us or our Services.

While sharing your personal information with third parties such as payment processors, etc we control the use of your data via written contracts which conform to this Privacy Policy.

Data Retention

The retention period for your data, collected through our contact website or email will vary, depending on the development of our business relationship and until fulfilment of the purposes, for which your data has been collected and/or to comply with our legal obligations as per applicable record retention laws (including obligations under the Anti Money Laundering Act). We retain the data we have collected for as long as needed to provide our service, or until we have legitimate interest under the applicable legislation, or until an individual request us to delete its Personal Data, as detailed below.

Data Location

We use servers located in the European Union and in the United States to store personal data gathered by the Services. Additionally, to the extent, we do not transfer your data to a third party, including our related affiliates, as described in this Policy.

Your rights with regard to personal data processing

To the extent that your personal data have been collected, every user is entitled to the following rights, subject to applicable data protection laws in Your respective jurisdiction:

Right to withdraw consent at any time

If processing is based on consent, you can withdraw your consent at any time. Your withdrawal of consent does not affect the lawfulness of processing based on consent before your withdrawal.

Right of access by the data subject

You can confirm with us whether we have processed your personal data. If we process your personal data, you have the right to request for copies of your personal data. We may charge you a small fee for this service.

Right to rectification

You have the right to request that we correct any information about you that you believe is inaccurate. You also have the right to request that we complete information about you that you believe is incomplete.

Right to erasure

You have the right to request that we erase your personal data, under certain conditions. We may not be required to comply with your request to delete personal data if the processing of your personal data is necessary for compliance with Our legal obligations as per applicable laws or for the establishment, exercise, or defence of legal claims.

Right to restriction of processing

You have the right to request that we restrict the processing of your personal data, under the following circumstances: (i) you contest the accuracy of your personal data; (ii) the processing is unlawful but you wish to restrict rather than prohibit the processing of your personal data; (iii) the purposes for processing your personal data no longer exist, but you require the personal data for the establishment, exercise, or defence of legal claims; or (iv) you have legitimately objected to the processing of your personal data and the processing is therefore restricted pending the verification of whether the legitimate grounds of the controller override your objection.

Right to data portability

To the extent that we process your personal data, (i) based on your consent or under contractual obligations, and (ii) through automated means, you have the right to request that we transfer your personal data that we have collected to another organization where technically feasible, or directly to you in a structured, commonly used, machine-readable format.

Right to object and automated individual decision-making

You have the right to request that we restrict the processing of your personal data, under the following circumstances: (i) you contest the accuracy of your personal data; (ii) the processing is unlawful but you wish to restrict rather than prohibit the processing of your personal data; (iii) the purposes for processing your personal data no longer exist, but you require the personal data for the establishment, exercise, or defence of legal claims; or (iv) you have legitimately objected to the processing of your personal data and the processing is therefore restricted pending the verification of whether the legitimate grounds of the controller override your objection.

The right to lodge a complaint with a supervisory authority

You can lodge a complaint with a supervisory authority, in particular in the member state of the European Union, in your habitual residence, place of employment or place of alleged infringement. Without implying any obligation to do so, we would like to kindly encourage you to discuss and try to resolve in good faith any issue, which may have arisen with regards to data processing, storage and usage.

Children's Privacy

We do not process personal data of children under the minimum legal age pursuant to local legal requirements in the state, province, country or jurisdiction of residence. We take appropriate measures to ensure that children do not use the Services. If you discover that a underage child has provided us with his/her personal data, please contact us at: privacy@affility.co

To exercise your data protection rights as listed above, please send the privacy request form to privacy@affility.co Please note that we may request for additional identification including photo identification in order to verify and grant an individual access to their requested personal data. For further questions and concerns, you may reach our Data Protection Officer at privacy@affility.co

Changes to this Policy

This Policy is current as of the Effective Date set forth below. We may change this Policy from time to time, so please be sure to check back periodically to be updated. We will post any changes to this Policy on the Site and the Services. If we make any changes to this Policy that materially affect our practices with regard to the personal data that we have previously collected from you, we will endeavour to provide you with notice in advance of such change by highlighting the change on the Site and the Services.

Additional Information for Users in California, USA

CCPA grants certain privacy rights to residents of California, USA regarding the personal information we collect. We respect these rights and strive to comply with CCPA. The following describes these rights and Affility practices regarding them.

Right to know

Under the CCPA you have the right to request that we disclose to you what Personal Data we collect, use and/or disclose.

Right to Request Deletion

You have the right to request deletion of Personal Data that is in our possession, subject to certain exceptions. Please note that your request to delete data may impact your use of the Steam service in some cases, and we may decline to delete information for reasons set forth in this Privacy Policy or as permitted by the CCPA.

Other Rights

The CCPA also gives California residents a right to opt-out from the sale of their Personal Data. We do not sell Personal Data and have not done so in the past 12 months. You also have a right to receive notice of our practices at or before collection of your Personal Data. Finally, you have a right to not be discriminated against for exercising your rights under the CCPA.

Exercise of rights.

The way you access, manage, or delete your personal information is through contacting our dedicated customer support department at support@affility.co Another way to exercise your rights is directly by submitting a ticket using our website Affility.com.

You may appoint a formal agent in writing or by power of attorney to request the exercise of your rights under CCPA. Prior to responding to a request from an agent, we require the agent to provide evidence that it has been authorized to act as an agent. We may also ask you to verify your identity directly or indirectly with us.

Right Of Access by The Data Subject

You can confirm with us whether we have processed your personal data. If we processed your personal data, you have the right to request for copies of your personal data. We may charge you a small fee for this service.

Right To Rectification

You have the right to request that we correct any information about you that you believe is inaccurate. You also have the right to request that we complete information about you that you believe is incomplete.

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