

BOUNTY GURU

Privacy Policy

INDUTO OU is the owner and operator of BountyGuru Platform and is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).

INDUTO OU is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice does not form part of any contract to provide services that we have entered into with you. We may update this notice at any time.

It is important that you read this notice so that you are aware of how and why we are using such information.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are also “special categories” of more sensitive personal data, which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, e-mail address, account name, wallet address.
- A Facebook, Twitter, Telegram, Bitcointalk “tokens” which links to your accounts (although this only provides us with the expiry date for information that you access to our application and not the full profile information).
- Technical information in relation to your computer or other device, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visits to our websites, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page;

- other personal data which you may provide in conversations with us in the course of our providing the services.

The more sensitive “special categories” of data includes data such as information about race, ethnicity, religious belief, sexual orientation, political opinions, trade union membership, health, genetic or biometric information and information about criminal offences or convictions. Processing of this data is prohibited unless one of the additional grounds in Article 9 of the GDPR apply.

We do NOT currently collect, store or use any of the “special categories” of more sensitive personal information.

How is your personal information collected?

We collect personal information from you when you provide information by filling in forms on our website (for example whilst setting up a customer account) or by corresponding with us by phone, e-mail, live chat or otherwise. This includes information you provide when you register to use our site, subscribe to our service, place an order on our site, participate in social media functions on our site and when you report a problem with our site.

We may automatically collect information about you and your computer or device when you visit our website as set out above. Please refer to our Cookie statement for further information about the cookies used on our website.

We may also sometimes collect additional information about you from third parties. We work closely with third parties (including, for example, analytics providers and search information providers such as Google Analytics, Facebook) and may receive information about you from them.

How we will use your personal information, and the legal basis for this

We need all the categories of information in the list above (see paragraph headed “The kind of information we hold about you”) primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

The specific situations in which we will process your personal information are listed below:

- We will use your personal contact details for the purpose of entering into and performing our contract with you and providing the services which you have ordered. The basis for this processing will be that it is necessary for the performance of our contract with you or in order to take steps at your request prior to entering into such a contract.

- We may use your name and email address to provide you with marketing information in relation to goods and services supplied by us which we believe may be of interest to you. The basis for this processing will be that it is necessary for the purpose of our legitimate interest in ensuring that you are aware of the full range of products and services which we offer from time to time.
- We will use technical information about you and your computer or device for the purpose of maintaining and improving our website and the quality and efficiency of our services. The basis for this processing will be that it is necessary for the purpose of our legitimate interest in ensuring our website and services are operated effectively.
- We will use your personal information to maintain our own administrative and accounting records and to fulfil related legal obligations to which we may be subject. The basis for this processing will be that it is necessary for compliance with legal obligations to which we are subject.
- Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to enter into a contract with you or perform a contract we have entered into with you, or we may be prevented from complying with our legal obligations.

Data sharing

We can transmit all proper information about you to the third parties (performers of the Bounty campaigns) under the contract obligations with those. Nevertheless, only in case of mentioned third parties agreed to use all the received information strictly in compliance with our Privacy Policy.

Which third-party service providers process my personal information?

“Third parties” includes third-party service providers (including contractors and designated agents).

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers who act as data processors are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow these third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Where third party partners collect and use your data as data controllers in their own right (as identified above) this will be on the basis of their own user terms and privacy notices and they will be responsible for GDPR compliance in relation to their use of your personal data.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Transferring information outside the EU

We may transfer the personal information we collect about you to countries outside the EU in order to perform our contract with you. When we do so, we will determine whether there is an adequacy decision by the European Commission in respect of those countries or another lawful basis for the transfer under GDPR.

If, for any reason, we intend to transfer the personal information we collect about you to countries outside the EU for which there is no basis for transfer as above, we will write to you to advise you of the potential risks and to seek your explicit consent to the proposed transfer before it takes place.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties that need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. If, for any reason, you cease to be a customer of the company, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes in which case we will stop processing for this purpose.

- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us at the details below:-

Compliance Manager

compliance@induto.com

INDUTO OU - Tallinn, Kesklinna linnaosa, Parda tn 12, 10151

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us using the details listed above (see paragraph headed “Your rights in connection with personal information”). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Compliance Manager

We have appointed a compliance manager to oversee compliance with this privacy notice or to answer any questions about how we process your personal information. Their details are listed above (see paragraph headed “Your rights in connection with personal information”).

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.