

## **I. General provisions**

This document is the Privacy Policy (“Privacy Policy”) of the website <https://mmoauctions.com> (“Website”). It defines how we collect, process and use information about users of the Website, especially for any purposes related with our service.

The administrator of personal data is company called: FP Global Limited, registered address: 2301 Bayfield building, 99 Hennessy Road, Wan Chai, Hong Kong.

In the Privacy Policy we define ourselves as "FP Global Limited", "we", "us", "ours" or "the Administrator".

In the Privacy Policy, we define yourself as "you" or "User".

All terms starting with a capital letter, not defined in the Privacy Policy, have the meaning as provided in the Terms and Conditions of our Website (also referred to as: “T&C”).

You can contact us:

- 1) via e-mail: [contact@mmoauctions.com](mailto:contact@mmoauctions.com)

## **II. Personal data of minors**

As provided in T&C, in order to use the Services, the User should have full legal capacity, which basically means that you should be over 18 years old. Persons between 16 and 18 years old must have consent of their parent or legal guardian in order to use the Website or other Services.

FP Global Limited does not deliberately process any personal data of persons under 16 years of age.

## **III. How do we collect and process your personal data?**

We respect your right to privacy. We ensure that the collected personal data is processed in a lawful manner, for legitimate purposes and not subject to further processing incompatible with these purposes. We comply with the right to privacy protection and guarantee to all the people using the Website that the data provided will be properly protected against being seized by third parties. If you are a resident of European Union (“EU”), your data is processed especially in accordance with the 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) – hereinafter: “GDPR”. GDPR’s full official text in English can be found here: <http://eur-lex.europa.eu/legal-content/ENG/TXT/?uri=CELEX%3A32016R0679>

Using the Website as well as providing personal data by the User is voluntary, subject to two exceptions: (1) entering into agreements with the Administrator - failing to provide personal data necessary to conclude and perform the contract with the Administrator results in the inability to conclude the contract (e.g. contract for provision of Services, contract for purchase of paid Website features and account upgrades). Providing personal data is in this case a contractual requirement and if the data subject wants to conclude a given agreement with the Administrator, he/she is obliged to provide the required data; (2) statutory duties of the

Administrator - providing personal data is a statutory requirement resulting from generally applicable legal provisions imposing an obligation on the Administrator to process personal data (e.g. data processing for the purpose of keeping tax or accounting books) and failure to provide them will prevent the Administrator from performing these duties.

We obtain information about you and your behavior in the following way:

- 1) By voluntarily entering information, including when you fill out forms available on the Website (e.g. when you register an Account),
- 2) When you voluntarily provide us with your the personal data, when you contact us by phone, email or traditional mail (e.g. when you file a complaint),
- 3) When you share your content within the Website or outside of it (e.g. when you publish something on our forums),
- 4) When you connect your accounts in social media with the Account on the Website (e.g. when you register an Account by using your Facebook profile),
- 5) By saving cookies in the terminal devices.

#### **IV. What data do we collect?**

When you sign up (register an Account) or use other Services provided via Website certain data is collected. This data includes:

- 1) e-mail address;
- 2) account name;
- 3) IP address;
- 4) Country (identified based on IP address);
- 5) any other data which you supply us via our Website;

We will not receive or store any of your payment details, this is fully handled by the relevant payment operator.

If you connect your Account on the Website with accounts on other websites or social media profiles (e.g. when you register an Account by using your Facebook profile), we may gain access to your personal data held by such websites.

#### **V. Legal basis**

The Administrator is authorized to process personal data in cases where - and to the extent that - at least one of the following conditions is met: (1) the data owner has agreed to the processing of his/her personal data in one or more specific purposes; (2) processing is necessary for the performance of a contract to which the data owner is party or to take action at the request of the data subject prior to the conclusion of the contract; (3) processing is necessary to fulfill the legal obligation of the Administrator; or (4) processing is necessary for purposes arising from legitimate interests pursued by the Administrator or by a third party, except when the interests or fundamental rights and freedoms of the data owner, requiring the protection of personal data, prevail over those interests.

The processing of personal data by the Administrator requires each time at least one of the grounds indicated above. The specific grounds for processing the personal data of the User by the Administrator are indicated in the next section of the Privacy Policy - in relation to a given purpose of personal data processing by the Administrator.

## VI. Purpose of data processing

The purpose, basis, period and scope of personal data processing by the Administrator depends especially on the actions of the Users and on applicable laws.

| <b>The purpose of data processing</b>   | <b>Legal basis for personal data processing</b>  | <b>Data retention period</b>   | <b>Requirement for providing data - contractual / statutory</b> |
|---|--|--|---|
| Executing the contracts for providing the Services (creating and maintaining Account, purchasing of paid Website features etc.) | Performance of the contract or taking steps at the request of the data subject prior to entering into a contract | The data is stored for the period necessary to implement, execute or terminate the concluded contract.   | Contractual   |
| Newsletter  | Consent  | The data is stored until the data subject withdraws his/her consent for further processing of his/her data for this purpose or files an objection to processing of personal data concerning him/her for direct marketing purposes. | N/A   |
| Keeping tax books   | Compliance with a legal obligation   | The data is stored for a period required by law ordering the Administrator to store tax books  | Statutory   |

|  |                                    |  |           |
|--|------------------------------------|--|-----------|
| Establishment, investigation or defense of claims that may be raised by the Administrator or which may be raised against the Administrator | Legitimate interest                | The data is stored for the duration of the legitimate interest pursued by the Administrator, but no longer than during the period of limitation of claims against the data subject, due to the business activity conducted by the Administrator. | N/A       |
| Dealing with complaints  | Compliance with a legal obligation | The data is stored for the period necessary to deal with a complaint.  | Statutory |
| Statistical purposes.<br>Improving the services we offer   | Legitimate interest                | The data is stored for the duration of the legitimate interest pursued by the Administrator, but no longer than for a period of 10 years from collection of data.  | N/A       |

## VII. How do we process your data?

We use a number of IT and organizational security measures to minimize the risk of data seizure, its destruction or disintegration, such as: firewall system, anti-virus and anti-spam security systems, internal access procedures, data processing and emergency recovery, as well as a backup system operating at many levels. Your personal data is stored on the external servers. Whenever it is possible, we use a high level of HTTPS / SSL connection encryption in accordance with accepted best practices.

However, please remember that using the Internet always carries the risk of specific security incidents, but we assure you that thanks to the implemented procedures we aim at reducing this risk as much as it is possible, by regular reviews of IT systems and their updates, as well as active monitoring of critical system points.

## VIII. Recipients of data

The use of the Services provided by the Website is related to the sharing of Users' personal data with recipients of personal data. Recipients of personal data are all entities (natural persons,

legal persons, as well as public authorities), which receive personal data of Users. Personal data may be disclosed in particular but not limited to the payment operators who handle the payments for paid Website features.

## **IX. Profiling**

Using the Website is associated with processing the User's personal data in an automated way, including in the form of the so-called profiling. Profiling can take place for example when the User has agreed to receive commercial information (subscribed for a Newsletter).

The processing of personal data in an automated manner and profiling will not adversely affect the User's rights and serves to evaluate some of information about User, in particular to analyze or forecast his/her personal preferences and interests.

## **X. Cookies**

Cookies are text files that are stored on your computer or mobile device. They are widely used in order to make websites and other online services work or be better or more efficient. They can do this because websites and other online services can read and write these files, enabling them to recognize you and remember important information that will make your use of them more convenient (e.g. by remembering your user preferences).

There are different types of cookies used by us:

- 1) Essential Cookies. These cookies are essential – that means in order to use the Website, they need to be functional. Without these cookies, the Services cannot be provided. These cookies cannot be disabled without severely affecting your use of it.
- 2) Performance Cookies. Performance cookies or analytics cookies, collect information about how you use our Services and enable us to improve the way our Website works.
- 3) Functionality Cookies. Functionality cookies allow us to remember the choices you made on the Website. It allows us to provide you with enhanced and more personalized features that help us to improve your visit to the Website.

In some circumstances, we may work with third parties to provide services on the Website. For example, third-party analytics providers may use their own cookies to collect information about your activities on the Website and the adverts you have used (clicked on). This information may be used by them to serve advertisements that they believe are most likely to be of interest to you based on content you have viewed. We do not control these cookies and to disable or reject third-party cookies, please refer to the relevant third party's website.

You may stop accepting cookies from the Website at any time, by changing your setting in your browser or mobile device. Please be aware that if cookies are disabled, not all features of the Website may operate as they are supposed to operate.

## **XI. Third countries (applies to data subjects from EU)**

As we are a company based outside of EU, your personal data will be processed by an entity from third country within the meaning of GDPR (third country within the meaning of GDPR is a country which does not belong to EU). The legal basis for the transfer of your personal data to a third country depends on the scope of the transfer of data and/or to which country the data is transferred. The types of legal bases for transfer of personal data outside of EU are regulated in chapter V of GDPR.

Subject to the further provisions of the Privacy Policy, transfer of your personal data to third country is basically necessary for the performance of a contract between you and us (e.g. contract for provision of Services, creating an Account, contract for purchase of paid Website features).

Transfer of personal data from EU to United States of America (for example with Google LLC as a result of using cookies) is based on the Decision of the European Commission 2016/1250 of 12 July 2016 on the adequacy of protection provided by the EU-US Privacy Shield.

## **XII. Your rights**

If the legal basis for processing of your personal data is consent, you have the right to withdraw your consent to the processing of personal data at any time. Withdrawal of consent does not affect the legality of the processing which was carried out on the basis of consent before its withdrawal. In particular, you have the right to object to the processing of your personal data for marketing purposes at any time.

Your rights regarding processing of your personal data may depend on where you live. For example, if you are a resident of the EU (or you are subject to EU law on a different basis), you have a right to:

- 1) access personal data stored by us;
- 2) request correction of your personal data;
- 3) demand the restriction of the processing of personal data;
- 4) request the deletion of personal data from our database;
- 5) transfer data to another entity;
- 6) file a complaint with the appropriate supervisory authority;
- 7) object to the processing of personal data processed for marketing purposes, including profiling.

You can exercise your rights by contacting us (apart from the right to file a complaint).

## **XIII. Changes to the Privacy Policy**

We reserve the right to change this Privacy Policy if we deem it necessary, such as for legal reasons or to reflect changes in the Services.

We will inform you about any changes to the Privacy Policy in advance, no later than 7 days before they enter into force, by publishing them as a uniform text of the Privacy Policy on the

Website and by sending you an e-mail informing about changes. If you do not accept the changes, you can terminate the contract for the provision of Services, informing us of this no later than within 7 days of receiving the message. Until the contract is terminated, you will not be bound by the new wording of the Privacy Policy, unless the change is required by mandatory legal provisions. If within 7 days you do not inform us that you do not accept changes to the Privacy Policy, we will assume that you agree to them and the new terms will apply to you from the effective date of the changes.

#### **XIV. Final provisions**

The Privacy Policy may be also available in languages other than English. However, in case of any discrepancies between the language versions, the English version shall prevail.

If any provision of the Privacy Policy should be found invalid or ineffective, such provision should be omitted, which does not affect the validity of the remaining provisions of the Regulations.