

# Profitage Privacy Policy

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This privacy policy (the “**Privacy Policy**”) describes how **Profitage OU**, registration code **16075135** (the “**company**”, “**Profitage**”, “**we**”, “**us**” and “**our**”), uses personal data collected from you (the “**user**”), upon interactions with Profitage Digital Products (the “**Digital Products**”) and online platforms, websites or any other digital domains (the “**Platforms**”), which are described in the Terms and Conditions (the “**Terms**”).

This Privacy Policy includes details about how we process, and in certain cases disclose personal data. By using our **Website**, **Telegram Bot** or other Platforms and Digital Products, you signify your acceptance of this Privacy Policy, so please read it carefully!

## 1. DATA CONTROLLER

1.1. Pursuant to provide and improve the Digital Products described in the **Terms**, Profitage relies on collecting and processing various data, including personal data, and according to the European Union’s General Data Protection Regulation (2016/679) (the “**GDPR**”), acts as a **Data Controller**.

1.2. Profitage collects several **Types of Personal Data** for various **Data Processing Purposes**.

## 2. DATA SUBJECT

2.1. All visitors of the **Profitage Website**, and all users of the **Profitage Telegram Bot**, become **Data Subjects** and their information is handled by the Data Controller in accordance with GDPR.

2.2. Data Subjects below the age of 18 are not allowed to use our Digital Products, and must request deletion of their data upon coming into violation with this Privacy Policy.

2.3. Data Subjects have the right to request a copy of their personal data.

2.4. Data Subjects have the right to request correction of their personal data, if the data is believed to be incorrect, inaccurate or incomplete.

2.5. Data Subjects have the right to object processing of certain personal data, i.e. the data collected on legitimate interest or for marketing purposes.

2.6. Data Subjects have the right to request erasure of their personal data from Profitage and/or another controller (if feasible), using the channels outlined in the **Contact** section of this Privacy Policy.

2.7. Data Subjects have the right to receive their personal data in a structured and commonly accessible way, or have their data transmitted to another controller (if feasible).

2.8. Data Subjects have the right to withdraw their consent for personal information processing (such as unsubscribing from our marketing emails).

## 3. TYPES OF PERSONAL DATA

3.1. Personal data is any information that can be used to identify you as a private individual.

3.2. Anonymous data is not personal data, as it cannot be linked back to you.

3.3. We may collect and process the types of personal data listed below:

Data Type	Personal Data
Main Data	Telegram user ID.
Billing Data	Main Data, billing information, payment method details, payment confirmation results.

<b>Transaction Data</b>	API key, exchange account data, transaction data.
<b>Communication Data</b>	Main Data, username on any other platform used to contact us, email, conversation ID, date, time and contents of your message.
<b>Marketing Data</b>	Main Data, email, Google Analytics client ID, social media pixels, consents, engagement, responses to surveys, source data (click ID or UTM parameters), location data.
<b>Technical Data</b>	Main Data, log data.
<b>Usage Data</b>	Anonymized data about actions made.
<b>Cookie Data</b>	Please refer to our <a href="#">Cookie Policy</a> for information on Cookies and personal data use.

#### 4. DATA PROCESSING PURPOSES

4.1. Profitage collects and uses only the data which is required for maintaining and improving its Digital Products and Platforms, and for which we have a legal reason.

4.2. The purposes to process certain data types, as well as legal reasons, are listed below:

Processing Purpose	Data Used	Legal Reason
Providing the Digital Products in accordance with the Terms, and doing everything necessary to keep the Platforms operational.	Main Data, Billing Data, Transaction Data, Communication Data.	Profitage's legitimate interest in providing the Digital Products outlined in the Terms and agreed upon by the company and the user upon starting of the Telegram Bot.
Responding to requests submitted via digital Platforms or email.	Main Data, Communication Data.	Profitage's legitimate interest in ensuring effective relationship management with potential and existing users and other interested parties.
Sending information about Telegram Bot's updates, including new features and other news.	Main Data, Communication Data.	Profitage's legitimate interest in informing users about the Telegram Bot's updates.
Administering given and withdrawn consents list.	Marketing Data.	Profitage's legitimate interest in ensuring valid legal basis and recording given and withdrawn consents.
Offering prizes, promotions or discounts.	Main Data, Marketing Data.	Profitage's legitimate interest in improving client relationships and/or rewarding new or regular users.
Providing information and status reports via notifications by a chosen Platform.	Communication Data.	Profitage's legitimate interest in keeping the users up to date about their exchange operations and status.
Sending marketing information regarding our Platforms, features, offers and promotions via our Platforms or email.	Communication Data, Marketing Data.	Profitage's legitimate interest in providing information we consider may be of interest to users, who in their turn, should give consent to each method of communication individually.
Measuring the effectiveness of marketing tools.	Marketing Data.	Profitage's legitimate interest in improving the efficiency of marketing tools.
Maintaining the stability and improving the usability of the Website and the Telegram Bot.	Technical Data, Usage Data.	Profitage's legitimate interest in improving user experience across the Platforms.
Diagnosing and repairing problems with the Platforms.	Technical Data, Usage Data.	Profitage's legitimate interest in ensuring the functioning of the Platforms.

Analyzing the use of the Platforms.	Technical Data, Usage Data.	Profitage's legitimate interest in ensuring security and integrity of the Platforms, and deterring suspicious and/or fraudulent behavior.
Analyzing the use of the Platforms and carrying out A/B testing and UX research.	Usage Data.	Profitage's legitimate interest in understanding, improving and developing the Platforms upon user needs.
Storing information containing personal data in our backup systems.	Main Data, Communication Data.	Profitage's legitimate interest in ensuring the continuity and security of data processing operations.
Complying with legal or regulatory obligations or requests.	All Data Categories.	Performance of legal obligations. Profitage's legitimate interest to deliver on legal obligations.
Disclosing or storing data with our service providers.	Billing Data, Transaction Data, Communication Data, Marketing Data, Technical Data.	Profitage's legitimate need in using trusted providers to deliver stable and accessible Digital Products and Platforms.

Profitage may process personal data for other purposes, provided that the purposes are disclosed in a timely manner, and that the user either consents to the proposed use of the personal data, other legal grounds exist for the new processing purposes, or the new purpose is compatible with a pre-existing purpose brought out above.

## 5. PERSONAL DATA SECURITY

Profitage takes reasonable technical and organizational security measures to protect personal data against accidental or unlawful processing, alteration, disclosure, abuse or theft. These measures vary based on the sensitivity of the personal data and technological capabilities. However, it should be stated explicitly that no security measure can be 100% effective, and there can be no guarantee of 100% data security against attacks and other malicious activities.

Users are encouraged to take personal data safety measures seriously. As such, users are advised to enable two-factor authentication wherever possible, keep API keys safe, and avoid using unencrypted internet connections.

## 6. PERSONAL DATA RETENTION

Profitage retains some personal data for the duration necessary to fulfill the objectives outlined in the Data Processing Purposes section of this Privacy Policy. The retention period is subjective to data type and retention reasons, listed below:

Data Types	Retention Details
Main Data, Billing Data	7 years from the moment of transaction.
Transaction Data	7 years after account deletion.
Communication Data	3 years from the moment the respective communication took place, under Profitage's legitimate interest to establish, exercise, or defend against potential legal claims. In case we have reasonable doubt that a party has breached the contractual relationship between us intentionally, we may prolong such retention period for a maximum of 10 years.
Marketing Data	30 days after the termination of the Terms, including deletion of the User Account, or upon withdrawal of consent. Profitage will retain a note regarding the withdrawal of consent.

Technical Data and Usage Data	30 days as of the collection of such data.
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If the retention period is over or the data is no longer needed, it will be destroyed.

## 7. PERSONAL DATA TRANSFERS

Profitage may disclose some personal data to individual controllers that require it for their own purposes, such as:

Data Controllers	Disclosure Purpose
Public sector and law enforcement authorities	Profitage's legitimate interest to stay compliant with Estonian and European legislations, and fulfill legal obligations set out by authorities, such as but not limited to Estonian Police and Border Guard Board.
Service providers	Profitage's legitimate interest in providing the highest quality of the Digital Products, and a strong need to rely on third-party service providers to deliver parts of the functionality. Such service providers include, but are not limited to server infrastructure providers, payment service providers, marketing analytics platforms and traffic attribution systems.

## 8. THIRD-PARTY LINKS

Profitage's Platforms may have links to external, third-party sites not under our control. Any data received from third-parties will be processed in accordance with this Privacy Policy, however it does not apply to data processing conducted on the side of such third parties. To read more about individual Privacy Policies of third parties, users shall turn to respectful documents, provided by such parties.

## 9. CHANGES TO PRIVACY POLICY

- 9.1. Profitage regularly reviews this Privacy Policy to keep it up to date.
- 9.2. We may change this Privacy Policy at our own discretion.

## 10. SUPPORT

For issues, concerns or requests in regard to this Privacy Policy or Personal Data, users may contact [profitage.com/support](https://profitage.com/support) with their requests.