Iconebene, Level 7, Office 6, Plot 441, Reduit Road, Ebene, Cybercity, Mauritius
www.doto.com

Privacy Policy Doto Partners

BACKGROUND:

We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone and will only collect and use personal data in ways that are described in this Privacy Policy, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of our Website. If you do not accept and agree with this Privacy Policy, you must stop using our Website immediately.

Who we are:

We ("ADVERTICALS DMCC", "we", "our" and "us") are: Adverticals DMCC, a company number DMCC190151, having its registered office at Unit No: 3307-A JBC1, Plot No: JLT-PH1-G2A, Jumeirah Lakes Towers, Dubai, United Arab Emirates.
To contact us about anything to do with your personal data and data protection, including to make a subject access request, please contact our privacy team at info@doto.partners.

1. Definitions

In this Policy the following terms shall have the following meanings:

Personal Data	Personal data is any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. Anonymous information, which we are not in a position to relate to you, does not qualify as personal data.
Cookie	means a small text file placed on your computer or device by our Website when you visit certain parts of our Website and/or when you use certain features of our Website. Details of the cookies used by our Website are set out in Section 12 of this Privacy Policy

2. What Does This Privacy Policy Cover?

Privacy Policy applies only to your use of https://doto.partners (hereinafter – "Website"). Our Website may contain links to other Websites. Please note that we have no control over how your data is collected, stored, or used by other Websites and we advise you to check the privacy policies of any such Websites before providing any data to them.

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3. What Are Your Rights?

You have the following rights, which we will always work to uphold:

a. The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Section 17.

b. The right to access the personal data we hold about you. Section 11 will tell you how to do this.

c. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Section 17 to find out more.

d. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Section 17 to find out more.

e. The right to restrict (i.e. prevent) the processing of your personal data.

f. The right to object to us using your personal data for a particular purpose or purposes.

g. Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Section 17.

4. What Data Do We Collect?

Depending upon your use of our Website, we may collect some or all of the following personal and non-personal data (please also see Section 12 on our use of cookies and similar technologies) **directly** from you:

Identification data: Surname and first name, country, contact information (telephone number, email, Skype, Telegram, etc.), traffic source, traff-back url, tracking identifier, a copy of a valid document with identifying photo, personal identification number, date of birth, citizenship, residence address, the location and nature of advertising activities.

KYC data: Surname and first name, date of birth, country, residential address, passport, selfie with ID, ID photo or scan, proof of address, photo or scan.

Financial data: for processing payment/s and fraud prevention such as tax identification number, for example of payment of any taxes, bank details, e-wallet details, or other payment details for the transfer of the Partner Remuneration including - name of a recipient (payee), bank account number, bank code (BIC or IBAN), name and address of a bank.

Technical data: IP address, login, web browser type and version, operating system, cookies and a list of URLs starting with a referring site, your activity on our Website, and the site you exit to, etc.

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We may collect your personal data (technical data and identification data) **indirectly** from our service providers and subsidiaries for one or several purposes as listed below.

5. How Do We Use Your Personal Data?

Your personal data will be used for one of the following purposes:

- providing you with our products and services;
- administrative purposes, including to help us better understand how our partners, third parties access and use our websites; to report to potential partners, service providers, regulators and others; to implement and maintain security, anti-piracy, fraud prevention and other services designed to protect our partners, partners and us; and to enforce our policies, directives and processes;
- for KYC verification and potential fraud detection (without using automated decision-making);
- personalize and tailor your experience on our websites and personalize and tailor our products and services for you;
- to communicate with you, including responding to requests for assistance, and to provide you with information via email to which you have consented;.
- marketing purposes, which may include contacting you by email and/or mail with information, news and offers about our products and/or services;
- to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violation of the law;
- to comply with applicable legal obligations, including in response to an order from authorities or a court or a request for disclosure (whistleblowing, internal investigations, conflict of interest management, litigation management, legal compliance, etc.);
- for research and development purposes, including improving our websites, applications, services and user experience, and for other research and analytical purposes to improve our products, services, business, operations and processes;
- for partner service activities, including partner relationship management, for technical support or other similar purposes, and for the creation and maintenance of partners' accounts;
- processing during procurement activities (contracts for new products or services, vendor management, etc.)
- processing through internal and external means of communication, public social networks to manage advertising campaigns with partners, for organizing events (conferences, seminars, etc.).

The legal basis for processing your personal data are:

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- to comply with contractual obligations (when you subscribe to a particular service through the Website, the purposes of processing your personal data are primarily determined by that service and we will process your information so that we can provide that service to you);

- as a result of your consent (when you have consented to the processing of your personal data by us for certain services through the Website, you can withdraw consent at any time by contacting us);

- within the scope of a legitimate interest (for the administration and management and performance of our business relationship including accounting, auditing, performance of the contract; for the analysis and optimisation of the Website; for ensuring IT security; for ensuring efficient communication and to keep you up-to-date on the latest information about our services, solution and/or business activities, events, marketing campaigns, market analysis or other promotional activities and for analysis and improving the quality of our services and communication with you);

- on the basis of legal obligations or in the public interest. We, as any other company, are subject to legal obligations and regulations. In some cases the processing of your personal data will be necessary for us in order to fulfil these obligations.

6. How Long Will We Retain Your Personal Data?

We will not retain your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be retained for only as long as the company has a legitimate or lawful basis for keeping such records.

We delete your personal data, except for your transaction history and other data that we are required to keep under applicable laws:

- whenever personal data is no longer necessary to provide you services,

- if it is requested by you,

- when required by law or regulation,

- when you delete your account.

7. Where Do We Transfer Your Personal Data?

Below is a list of countries/territories where we and our service providers are located, which might have access to your personal data where it is relevant.

Mauritius, South Africa, the UAE (DMCC), the USA.

Please contact us using the details below in Section 17 for further information about the particular data protection mechanism used by us when transferring your personal data.

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8. Do We Share Your Personal Data?

We will not share any of your personal data with any third parties for any purposes, except the cases directly indicated in this Policy:

1) Adverticals DMCC and its subsidiaries;

2) Authorised persons working for or on behalf of Adverticals DMCC, including our agents, service providers, e.g. conducting KYC procedures, and advisers providing the variety of products and services we need such as IT services, maintenance and support, procurement services, advertising, compliance and security services, etc.;

3) Adverticals DMCC business partners in connection with our activities;

4) Other authorised third parties in connection with a reorganisation, merger or sale of Adverticals DMCC businesses, and/or assets;

5) Law enforcement or any relevant authorities where necessary to comply with applicable law.

9. How Can You Control Your Personal Data?

When you submit personal data via our Website, you may be given options to restrict our use of your personal data. In particular, we aim to give strong controls on our use of personal data of our Website users for direct marketing purposes (including the ability to opt-out of receiving emails from us which users may do by unsubscribing using the links provided in our emails and/or at the point of providing user details and by managing a user account).

10. Can You Withhold Information?

You may access certain areas of our Website without providing any personal data at all. However, to use all features and functions available on our Website you may be required to submit or allow for the collection of certain data.

You may restrict our use of cookies. For more information, see Section 12.

11. How Can You Access Your Personal Data?

In addition to your opt-out right, you may exercise the following rights at any time:

- You may ask us to provide you with copies of the personal information that we hold about you, or with information about the processing of such information.

- You may ask us to update and correct any out-of-date or incorrect personal information that we hold about you.

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If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.
All subject access requests should be made in writing and sent to the email shown in Section 17.
We will respond to your subject access request within one month of receiving it. If you wish to exercise any of these rights, please contact us as described in Section 17.

12. How Do We Use Cookies?

Our Website uses cookies and similar technologies that collect tracking data to distinguish you from other users. This helps us to provide you with a good experience when you access the sites and use the services.
The cookies that are used on our Website fall into the categories described below. These descriptions can help you determine if and how you would like to interact with our Websites and other online services:

Strictly necessary cookies - These cookies are essential in order to enable you to navigate the Sites and use certain features. Without these strictly necessary cookies, the online services provided by the webites cannot be provided. It is therefore not possible for users to opt out of use of these cookies. In addition, the coding language the Sites are written in uses session cookies and their use cannot be avoided. These are deleted each time users close their browser. These cookies do not store any information about the visitor once the browser is closed.

Performance cookies - Our performance cookies collect anonymous information about how users use the Sites and their features. For instance, our performance cookies collect information about which pages on the Sites are visited most often, which advertisements users view or interact with on our website or other websites on which our advertisements appear and if users receive any error messages.
Analytics cookies - The Sites may use other similar analytics cookies. These cookies are used to collect information about how visitors use the website. The information is collected anonymously, and used to report on the number of visitors to the Sites, where the visitors have come from, and the pages they have visited. Furthermore, users can prevent Google’s collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under https://tools.google.com/dlpage/gaoptout. Further information can be found under http://www.google.com/analytics/terms/gb.html (Google Analytics Terms of Service & Privacy). Please note that on the Sites, Google Analytics code is supplemented by "gat._anonymizeIp();" to ensure an anonymized collection of IP addresses (so called IP-masking). Also, users can prevent Google Analytics from collecting such data on behalf of the company by clicking on the following link: https://tools.google.com/dlpage/gaoptout.

Functionality cookies - Functionality cookies are used to remember choices users make (such as language preference, country location, or other online settings) and collect anonymous information. Our Website may place and access certain first-party cookies on users’ computer or device. Firstparty cookies are those placed directly by us and are used only by us. We use cookies to facilitate and improve users’ experience of our Website and to provide and improve our products and/or services. We have carefully chosen these cookies and have taken steps to ensure that users’ privacy and personal data is protected and respected at all times.

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Before cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those cookies. By giving your consent to the placing of cookies, you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of cookies; however, certain features of our Website may not function fully or as intended.

Certain features of our Website depend on cookies to function. You may still block these cookies by changing your internet browser's settings as detailed below, but please be aware that our Website may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete cookies on your computer or device at any time, however you may lose any information that enables you to access our Website more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

13. Marketing

We may use your personal data, such as your name, email address, telephone number, etc. ourselves or by using our third-party subcontractors for the purpose of providing you with promotional materials, concerning our products and services, as well as websites and applications which relate to our business partners, which we believe may interest you.

Out of respect to your right to privacy, we provide you with such marketing materials with the means to decline receiving further marketing offers from us or from our business partners. At any time, you may opt-out by

- using the links provided in our marketing emails;
- sending a request to info@doto.partners.

Please note that even if you unsubscribe from our marketing mailing list, we may continue to send you service-related updates and notifications.

14. Changes to this Privacy Policy

We may change this Privacy Notice from time to time for various reasons such as changes to reflect in law and regulation, changes in industry practices, technological developments or if we change our business in a way that affects personal data protection.

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Any changes will be immediately posted on our Website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Website following the alterations. We recommend that you check this page regularly to keep up-to-date.

You will be notified of important changes to this Privacy Policy (purposes, identity of the controller, procedure for exercising rights, cross-border transfer, etc.). In this case, we will notify you of the changes within a reasonable period of 7 days before the changes take effect.

15. Children

We recognize that we have a special obligation to protect personal information obtained from children. We will not knowingly collect personal information from any child, or process such information, without parental consent. For the purpose of this Policy, a child means any individual who is under the age of 18 (or the minimum legal age to consent to the collection and processing of personal information where this is different under applicable law).

16. Security

We have implemented all reasonable technical, administrative and physical security measures to protect the security of your personal information.

All received information that the client provides is stored on secure servers and only authorized staff have access to this information. We take reasonable precautions to prevent the loss, misuse or alteration of your personal information. Our employees, contractors and agents may be given access to your personal information which we collect, but their use shall be limited to the performance of their duties in relation to facilitating your use of the Services. Our employees, contractors and agents who have access to your personal information are required to keep that information confidential and are not permitted to use it for any purposes other than those listed above or to deal with requests which you submit to us.

17. Enquiries, contact data

If you have any enquiries about this Policy, or any questions about the use of your personal data, including privacy requests, please e-mail our privacy team at: info@doto.partners.

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