

Bringin UAB GDPR & Privacy Policy

This GDPR & Privacy Policy constitutes a part of Bringin UAB Terms and Conditions (the "T&C"). The Terms and Conditions in this Privacy Policy shall have the same meanings as in the T&C except as otherwise provided herein.

This GDPR & Privacy Policy explains how Bringin, use, process, disclose, share, transfer, and protect personal information obtained through Bringin and its partners. The terms "we," "us," and "our" refer to Bringin. When we ask for certain personal information from users, it is because we are required by applicable laws or government orders to collect such information, or it is relevant for our specified purposes.

Please carefully read the full content of this GDPR & Privacy Policy. When visiting Bringin, regardless of whether or not you register for or log in the Bringin account, you acknowledge, understand, and consent to all articles described in this GDPR & Privacy Policy. We will not use your personal information for any purpose not covered in this GDPR & Privacy Policy or the T&C without prior notification to you and your consent.

This Privacy Policy has incorporated elements from the General Data Protection Regulation (GDPR) as we act in accordance with its personal information processing rules within the European Economic Area (EEA). We utilize standard contract clauses, rely on the European Commission's adequacy decisions about certain countries, as applicable, and obtain your consent for these data transfers to third countries if required by applicable laws.

By using our services or engaging in any transactions with us, you acknowledge and agree that, in accordance with the General Data Protection Regulation (GDPR), we may share your personal data with Lightspark Payments Europe AS for the purpose of providing you with our services. The sharing of your data is based on our legitimate interest and is necessary for the performance of the contract between you and us.

Lightspark Payments Europe AS will be considered a data controller and will process your personal data in compliance with the GDPR and any other applicable data protection laws. Lightspark Payments Europe AS processes your data in accordance with its privacy policy.

We will ensure that any data sharing with Lightspark Payments Europe AS is conducted in accordance with applicable data protection laws and regulations. We will only share the necessary personal data required for the purpose of providing you with our services and will not share any additional personal data without obtaining your explicit consent.

By continuing to use our services or engaging in transactions with us, you consent to the sharing of your personal data with Lightspark Payments Europe AS in accordance with our privacy policy.

1. Information We Collect

The following are the types of information we collect when you register for and use Bringin services:

1.1 Information You Provide to Us When Registering

When you create a Bringin Account, you provide us with certain identification information, including your email address, first name, last name, date of birth, mobile number, country code, and other relevant details. This information is collected by Bringin to make the services available to you and display your information within the Bringin application.

Please note that Lightspark Payments Europe AS, as the regulated third-party provider, controls and manages this data in accordance with applicable regulatory requirements. Bringin's role is solely to facilitate the availability and presentation of this information to you as a user within our platform.

1.2 Information We Collect as You Use Bringin Services

1. Service Usage Information

Through your access to and use of Bringin Services, we may monitor and collect tracking information related to usage including but not limited to your phone number, access date and time, device type and device identification, operating system and hardware setting, browser type, and information derived from SIM card, network operator, IP address, GPS, base station and WLAN ("Service Usage Information"). This information may be directly obtained by Bringin or through thirdparty service providers. The collection of Service Usage Information helps our systems to ensure that our interface is accessible for users across all platforms and can aid during criminal investigations.

2. Communication Information

You agree that, for the purposes disclosed in this GDPR & Privacy Policy, we are entitled to collect and use the information contained in or related to the communication that you send to us or generated through your use of Bringin Services ("Communication Information"), which includes:

- all messages, requests or other information you send in the course of your contact with Bringin;

2. How We Collect Information

2.1 Information Bringin Automatically Collects

Most of the personal information that we collect is directly provided by you. In the following situations, we will collect the information about you:

1. where you register for, log in or visit Bringin, or use any service of Bringin;
2. where you voluntarily complete any user survey or provide feedback to us via email or any other channel.
3. where you use cookies of the browser or software in visiting or using our website or APPs.
4. other situations where we may automatically collect your information as mentioned in this GDPR & Privacy Policy or our T&C (including the Bringin Platform Rules, the same below).

2.2 Information Collected from the Third-party Sources

We may collect information about you from third-party sources, including but not limited to, the following channels

1. public databases, credit bureaus and ID verification partners.
2. blockchain data;
3. marketing partners and resellers;
4. advertising partners and analytics providers.

2.3 Anonymized and Aggregated Data

Anonymization is a data processing technique that removes or modifies personal information so that it cannot be associated with a specific individual. Except for this section, none of the other provisions of this GDPR & Privacy Policy applies to anonymized or aggregated personal data (i.e. information about our Users that we combine together so that it no longer identifies or references an individual User).

We may use anonymized or aggregate customer data for any business purpose, including to better understand Users' needs and behaviours, improve our products and services, conduct business intelligence and marketing, and detect security threats. We may perform our own analytics on anonymized data or enable analytics provided by third parties.

3. How We Use the Information We Collect

We use the information we collect about you for the following purposes or in the following ways:

3.1 To Provide and Maintain Bringin Services

We use the information collected to deliver, maintain and provide better Bringin Services. We use the IP address and unique identifiers stored in your device's cookies to help us authenticate your identity and activities and provide Bringin Services. Given our legal obligations and system requirements, we cannot provide you with all or some of Bringin Services without data like Supervision Information, Service Usage Information, Communication Information.

3.2 To Protect Our Users

We use the information collected to protect our platforms, Users' accounts, and archives. We use IP addresses and cookies to protect against automated abuse such as spam, phishing, and Distributed Denial of Service (DDoS) attacks.

We analyse trading activities with the goal of detecting suspicious behaviours as early as possible to prevent potential fraud and loss of funds to bad actors.

3.3 For Measurement, Research and Development Purposes

We actively measure and analyse data to understand the way you use and interact with Bringin Services. This review activity is conducted by our operation teams to continually improve our Platforms' performance and to resolve issues with the user experience. In addition, we use such information to customize, measure, and improve Bringin Services and the content and layout of our websites and apps, and to develop new services. We continuously monitor activity information within our systems and our communications with users to look for and quickly fix problems.

3.4 To Communicate with You

We use personal information collected, like your phone number or email address to interact with you directly when providing customer support on a ticket or to keep you informed on logins, account security and other aspects. Without collecting your personal information for confirming each communication, we will not be able to respond to your submitted requests, questions, and inquiries. All direct communications are properly kept at Bringin or the service provider designated by Bringin, to be reviewed for accuracy, to be kept as evidence, or to be used to perform other statutory or contractual obligations.

3.5 To Enforce Our T&C and Other Agreements

The collected information is also used to continually and actively enforce our T&C and other agreements with our Users, including but not limited to reviewing, investigating, and preventing any potentially prohibited or illegal activities that may violate the foregoing provisions, or disclose the relevant information to a third party in accordance therewith.

Bringin reserves the right to suspend or terminate provision of any Bringin Services to any User found to be engaged in activities that violate our T&C and other agreements with our Users.

3.6 For Marketing and Advertising

We may share your personal information with our marketing partners for the purposes of targeting, modeling, and/or analytics as well as marketing and advertising.

3.7 For Any Other Purpose

We may disclose your personal information for any other purpose you consent to.

4. Marketing

If we think you may like specific Bringin Services or products and services of our partners, we hope to keep you informed about such products or services.

If you agree to receive the above marketing information, you can choose to receive it at any time in the future.

You have the right to ask us at any time to stop contacting you for marketing purposes or to send relevant information to you. If you do not want to be contacted for marketing purposes in the future, please click on the unsubscribe link in the bottom of the marketing email and submit your request to unsubscribe.

5. Processing of Personal Data Outside the European Economic Area (EEA)

Bringin UAB operates globally, and in certain situations, we may need to transfer and process personal data outside of the EEA. When we do so, we ensure that such transfers comply with the applicable data protection laws and regulations, and we implement appropriate safeguards to protect the privacy and security of your personal information.

5.1 Legal Basis for Transferring Personal Data Outside the EEA: The legal basis for transferring personal data outside the EEA varies depending on the circumstances. In general, we may transfer your personal data to countries outside the EEA in the following situations:

5.1.1 Performance of a Contract: If you engage in transactions or use our services, and the performance of our contract with you requires us to transfer your personal data to a recipient outside the EEA, we will do so to fulfill our obligations under the contract.

5.1.2 Consent: In some cases, we may rely on your explicit consent to transfer your personal data to countries outside the EEA. Before obtaining your consent, we will inform you about the specific purpose of the data transfer and the possible risks involved.

5.1.3 Legitimate Interests: We may transfer personal data outside the EEA based on our legitimate interests, provided that such interests are not overridden by your rights and freedoms. Our legitimate interests may include fraud prevention, system security, data analytics, and improving our services.

5.2 Safeguards Applied to Protect Personal Data When transferring personal data to countries outside the EEA, we ensure that appropriate safeguards are in place to protect your information. These safeguards may include:

5.2.1 Standard Contractual Clauses (SCCs): Where required, we use the European Commission's approved Standard Contractual Clauses as a legal mechanism for transferring

personal data between entities located in the EEA and countries that the European Commission has not deemed to provide an adequate level of data protection.

5.2.2 Adequacy Decisions: In cases where the European Commission has determined that certain countries outside the EEA offer an adequate level of data protection, we may rely on these adequacy decisions as a legal basis for data transfers to those countries.

5.2.3 Binding Corporate Rules (BCRs): Bringin may have implemented Binding Corporate Rules, which are a set of data protection policies and practices approved by relevant data protection authorities. BCRs ensure that all transfers of personal data within the Bringin group are subject to a high level of protection, regardless of the location of the data recipient.

5.2.4 Consent and Specific Purpose: When relying on your explicit consent for data transfers outside the EEA, we will ensure that you are fully informed about the purpose of the transfer and any potential risks involved. Your consent will be obtained separately from other terms and conditions.

5.2.5 Data Minimization: We only transfer the minimum amount of personal data necessary to achieve the intended purpose of the transfer. We do not transfer any additional data unless authorized by you or required by law.

5.3 Data Retention Personal data transferred outside the EEA will be retained for as long as necessary to fulfill the purposes for which it was transferred or as required by applicable laws and regulations.

5.4 Your Rights and How to Exercise Them If you are located in the EEA, you have specific data protection rights concerning your personal data processed by Bringin. These rights include the right to access, rectify, erase, restrict processing, object, and data portability. If you wish to exercise any of these rights or have any questions or concerns regarding data transfers outside the EEA, please contact us at support@bringin.xyz

6. How we Store and Protect User Data

Bringin has kept your personal information safe using fault-tolerant secured storage with industry standard encryption and implemented a number of security measures to ensure that your information is not lost, abused, or altered, including, but not limited to:

6.1 Physical Measures

Materials containing your personal information will be stored in a locked place.

6.2 Electronic Measures

Computer data containing your personal information will be stored in the computer systems and storage media that are subject to strict log-in restrictions.

6.3 Management Measures

Only authorized employees are permitted to come into contact with your personal information and such employees must comply with our internal confidentiality rules for personal data. We have also imposed strict physical access controls to buildings and files.

6.4 Technical Measures

Encryption technology such as PCI Scanning and Secured Sockets Layered Encryption may be used to transmit and store your personal information. We use various currently available general security technologies and supporting management systems to minimize the risks that your information may be disclosed, damaged, misused, accessed without authorization, disclosed without authorization, or altered.

6.5 Other Measures

Our web server is protected by the "firewall".

Please note that it is impossible to guarantee 100% security of information. As such, we request that you understand the responsibility to independently take safety precautions to protect your own personal information. You agree that we shall not be liable for any information leakage and other losses not caused by our intention or gross negligence, including but not limited to hacker attack, power interruption, or unavoidable technical failure, to the maximum extent permitted by law.

If you suspect that your personal information has been compromised, especially account and/or password information, please lock your Bringin Account and immediately contact Bringin Customer Support team: support@bringin.xyz

Unless otherwise stipulated by law or the T&C, you agree that we have the right to retain all the collected personal information for the duration of your Bringin Account for 5 or more years after the account is closed.

7. Cookies

7.1 What Are Cookies?

Cookies are small amounts of data that are sent to your browser and stored on your computer's hard drive to collect standard internet log information and visitor behaviour information. When you visit Bringin, we can automatically collect information from you through cookies or similar technologies.

7.2 How Do We Use Cookies?

We use cookies in a range of ways to make your experience on our Platforms more enjoyable, including but not limited to:

1. to keep you signed in;
2. to record your habits and preferences when browsing Bringin;
3. to record our performance and verify the effectiveness of online advertising through Google Stats with cookies.

7.3 What Types of Cookies Do We Use?

We use different types of cookies, including but not limited to:

1. Functional Cookies

We use such cookies to help us identify you and remember your previous preferences and settings, which may include your device, your operating system, your preferred language, your location, and other session data. We use a mix of first-party and third-party cookies.

2. Marketing Cookies

We use these cookies to collect information about your visit to Bringin, the content you view, the links you follow, and other information about your browsers, devices, your IP addresses and referral URLs. We sometimes share certain parts of the collected information with third parties for marketing purposes. We may also share online data collected through cookies with our marketing partners. This means that when you visit another website, you may also be shown advertisements based on your browsing patterns on Bringin.

7.4 How to Manage Cookies?

Most browsers are present to accept cookies. You can adjust your browser setting to prevent cookies or to notify you as soon as cookies are loaded. However, stopping all cookies might mean that you cannot access or use some features of the Bringin.

8. Data Protection Rights that You Enjoy

We hope to ensure that you are fully aware of the data protection rights that you enjoy. Unless otherwise required by law or government orders, each User has the following rights:

8.1 Right of Access

You have the right to access or obtain copies of your personal information. We may charge a reasonable fee for providing the access service.

8.2 Right to Rectification

You have the right to correct your personal information that you deem inaccurate. You also have the right to ask us to complete the personal information that you deem incomplete within a reasonable limit.

8.3 Right to Erasure (Right to be Forgotten)

You have the right to request the erasure of your personal data under certain circumstances.

8.4 Right to Restriction of Processing

Under certain circumstances as required by law or as specifically reminded by us, you have the right to request us to restrict the processing of your personal information; however, you understand that such restriction of the processing may prevent us from providing you with some of Bringin Services.

8.5 Right to Object

Under certain circumstances as required by Law or as specifically reminded by us, you have the right to object to the processing of your personal information; however, you understand that such objection of the processing may prevent us from providing you with some of Bringin Services.

8.6 Right to Data Portability

Under certain circumstances as required by Law or as specifically reminded by us, you have the right to request us to transmit the personal information that we collect to another body, or directly to you. We may charge a reasonable fee for providing the transmission service.

9. Privacy Policies of Other Websites

9.1 Privacy Policies of Non-Bringin Websites

If you visit other third-party platforms or partner's websites, apps via the links on Bringin, you should agree with and abide by their separate and independent privacy policies. We are not responsible for the content or the activities therein.

9.2 Privacy Policies of Bringin

This Privacy Policy applies to all platforms, websites, and departments of Bringin.com and Bringin ecosystem. If you visit any link to any sub-platforms of Bringin, you should agree with and abide by the separate and independent privacy policies of such sub-platforms. If the privacy policy of any sub-platform conflicts with this Privacy Policy, the privacy policy of such sub-platform shall prevail.

10. Changes to This Privacy Policy

From time to time, Bringin may revise this GDPR & Privacy Policy to reflect changes in Law or our personal-data collection, processing, and use practices. You shall regularly review the GDPR & Privacy Policy and pay attention to its revisions. If you do not agree with the revised content, you shall stop accessing Bringin immediately. When an updated version of the GDPR & Privacy Policy is released, your continued access to Bringin means that you agree to the updated content and agree to abide by the updated GDPR & Privacy Policy.

11. Contact Us

We are committed to respecting the freedoms and rights of all our Bringin Users. Should have any questions or concerns regarding this GDPR & Privacy Policy, or if you would like to file a data protection request, please send us request to support@bringin.xyz