

# Roxa Digital Privacy Policy



Effective date: 23 January, 2024

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your personal information when You visit Our website and/or use our Service and tells You about Your privacy rights and how the law protects You.

We use Your personal information to provide and improve Our Service to You. By accessing our website and using the Service, You agree to the collection and use of Your personal information in accordance with this Privacy Policy

We may amend this Privacy Policy at any time by posting a revised version on our website. The revised version will be effective at the time we post it. If the revised version includes a substantial change, we will provide You with 30 days' prior notice by posting notice of the change on the "Policy" page of our website.

## 1. Definitions

For the purposes of this Privacy policy:

- Account means a unique account created for You to access our Service or parts of our Service.
- Affiliate means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.
- Company (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to ROXA DIGITAL LTD, a limited liability company registered in Malta with registration number: C 103553 and registered office address located at: Premiere Business Centre, Suite 1, Level 2, Constitution Street, MOSTA MST 1750, MALTA.
- Cookies are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- Country refers to: Malta
- Device means any device that can access the Service such as a computer, a mobile phone or a digital tablet.
- Personal Data is any information that relates to an identified or identifiable individual.
- Service refers to the services offered on the Website.
- Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analysing how the Service is used.
- Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

# Roxa Digital Privacy Policy



- Website refers to roxa.digital
- You means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

## 2. Collecting and using Your Personal Data

We collect Your personal information through any information that You might provide directly to Us through Our Website.

### 2.1 Types of data collected

#### Personal data

When browsing Our Website, creating an account and accessing and using our Service, we may ask You to provide Us with certain personally identifiable information that can be used to contact You or identify You. Personally identifiable information may include, but is not limited to:

- Name & Surname;
- E-mail address;
- Date of birth;
- Address;
- Telephone number;
- Identity data.

### 2.2 Why do We collect the data?

The legal basis under which We collect Your personal Data is because it is necessary for our legitimate interests. When browsing our Website (including buying the Roxa voucher token), we may collect certain information in respect to the domain and host from which You access the internet, the IP address and the ISP You might be using. We collect this information in order to assess the effectiveness and the workability of Our Website, and for security reasons as well.

Personal Data is also collected, stored and process in order to be able to provide Our Service to you, and also in order to provide You with customized information. We also collect, store and process Your Personal Data in order to be able to communicate with You.

## 3. Usage Data

Usage Data is collected automatically when using Our Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other

# Roxa Digital Privacy Policy



diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

## 4. Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyse Our Service. The technologies We use may include:

### **Cookies or Browser Cookies**

A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless You have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.

### **Web Beacons**

Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be “Persistent” or “Session” Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

### **We use both Session and Persistent Cookies**

Most browsers automatically accept cookies. You can prevent cookies from being stored on Your hard disk by changing Your browser settings to “do not allow cookies”. For detailed instructions on how to do this, please consult Your browser manual. You may delete cookies that are stored on Your hard disk at any time.

## **When do we collect and process Your Personal Data?**

We collect Your Personal Data when:

### **5. Making queries about about Our Website, Our service our Our Company**

Another reason why We might collect information about You and Personal Data is if You have any questions about Our Website, Our service or our Our Company and You send us an e-mail. We then may store the enquiries and their contents, including any personally identifiable information You may have provided. Any personally identifiable information You submit via an enquiry is collected only with Your knowledge and consent.

### **6. Feedback and Surveys**

We may invite You to participate in customer surveys or provide Your feedback on our products and Service. We will use any information You provide only to make improvements to Our products and Service and not for any other. This processing is based on the legal basis of consent.

### **7. Our Newsletter**

We might send You newsletters, offering all the latest information about Our Service and which might also contain special promotions. Any information that You will provide in order to subscribe to Our newsletter, will only be used in order to add You to our mailing list. This processing is based on the legal basis of consent. You can revoke Your consent about the use of Your personal data at any time.

You can opt-out from receiving any such promotions at any time.

### **8. Transactional activity**

We also collect Your Personal Data when processing Your payments in order to buy the Roxa voucher token, as well as when we need to verify a transaction for the Roxa voucher token to one of our partnered websites. This data is encrypted. The legal basis for this processing is the performance of a contract. This information is needed for our legal obligations of transaction tracking.

## 9. Other instances where We might collect Your personal Data

We might also need to collect Your Personal Data for any other reason not specifically mentioned above. Examples include but are not limited to when You contact our customer support for an issue, or where there might be a dispute and a refund will be requested.

## 10. Exercising Your Data Privacy rights

You have the following rights in respect to Your Personal Data:

- The right to be informed about what Personal Data we collect about You;
- The right to access and attain information about Your Personal Data and how this is being processed;
- The right of rectification in order to update any inaccuracies or if We have incomplete data about You;
- The right of erasure (the right to be forgotten);
- The right to restrict processing;
- The right to data portability;
- The right to object to Your Personal Data being processed;
- Rights in relation to automated decision-making and profiling.

You can exercise Your above rights by contacting us at: [privacy@roxadigital](mailto:privacy@roxadigital)

## 11. Sharing Your Personal Information

We may share Your personal information in the following situations

- With Service Providers: We may share Your personal information with Service Providers to monitor and analyse the use of our Service, to contact You.
- For business transfers: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- With Affiliates: We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- With business partners: We may share Your information with Our business partners to offer You certain products, services or promotions.
- With other users: when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.

- With Your consent: We may disclose Your personal information for any other purpose with Your consent.

## 12. Retention of Your Personal Data

We will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain Your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

## 13. Transfer of Your Personal Data

Your information, including Personal Data, is processed at Our operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

We will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of Your data and other personal information.

## 14. Disclosure of Your Personal Data

### **Business Transactions**

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

### **Law enforcement**

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### **Other legal requirements**

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

# Roxa Digital Privacy Policy



- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

## Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

## Children's Privacy

Our Service does not address anyone under the age of 18. We do not knowingly collect personally identifiable information from anyone under the age of 18. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 18 without verification of parental consent, We take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

## 15. Links to Other Websites

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## 16. Changes to this Privacy Policy

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

# Roxa Digital Privacy Policy



You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **17. Contact Us**

If You have any questions about this Privacy Policy, You can contact us: By email: [privacy@roxa.digital](mailto:privacy@roxa.digital)