

# PRIVACY POLICY

Update date: 29/08/2024

## 1. PURPOSE

This section illustrates OPALITE's commitment through its website available at the following URL: [www.opalite.net](http://www.opalite.net) (the "Site"), with regard to respecting your privacy and protecting your personal data (the "Data"), collected and processed during your use of the Site and the Services under the conditions set out in our General Terms and Conditions of Use (available in the "GENERAL TERMS AND CONDITIONS OF USE" section of the Site). This Policy has thus been developed to:

- inform you, in advance and in complete transparency, about the Data likely to be collected and the use that may be made of it;
- allow you to browse the Site and use the Site's features with confidence;
- inform you of your rights regarding the Data concerning you that will be collected, in the event that you give your consent to their processing by checking the acceptance box provided for this purpose.

## 2. CONTENT POSTED ON THE SITE

Any personal information that you voluntarily put online (in your profile or in messages) is not accessible to the public and cannot be collected and used by third parties.

## 3. DATA COLLECTED

The Data collected and subsequently processed by our Site are those that you voluntarily transmit to us, where applicable, via the Registration Form when opening your possible User account (the "Account"), and then concern at least:

- Your name(s) and first name(s);
- A valid email address, the latter constituting your identifier (User name) to access your Account and our Services;
- A password chosen by you.

Your consent to the processing of your Data transmitted when opening your possible Account, via the Registration Form, will result from checking the acceptance box provided for this purpose, on the Site.

Some advanced features of the Site may, for authentication purposes, also require you to provide additional Data, such as your telephone number and postal address. Your prior acceptance will then be required again, by checking the box provided for this purpose, when activating the advanced features of the Site that require this Data. You can naturally refuse to communicate this additional Data, but such a refusal may prevent access to the advanced features of the Site that require this Data.

The Data collected automatically by the Site are your IP address (Internet address of your computer) to which are associated the version of your browser, the address of the page displayed and the date of the request.

Furthermore, browsing the Site may result in the automatic installation of cookies on your computer. Cookies are small texts sent by a website to your browser and which are stored on your computer. In this case, they allow our servers to identify you and thus offer you personalized information and automatically connect you to our services. They therefore only serve to simplify navigation and improve the ergonomics of the Site.

However, you can refuse the installation of cookies on your computer by modifying the relevant parameters of your Internet browser, but such a refusal may prevent access to certain services of the Site.

These cookies and their use are the subject of a specific Charter established by OPALITE and which you can consult now in the “Cookies” section of the Site.

#### **4. PURPOSES OF THE PROCESSING**

The Data identified as mandatory in the Registration Form referred to in Article 3 above are necessary in order to benefit from the functionalities of the Site.

We will use this information to operate and maintain our Site, to provide you with personalized features, and to process any reports or correspondence from you.

The Data collected automatically by the Site allows us to produce consultation statistics for its web pages.

We do not use your email address or any other information that could identify you personally without your consent, whether to send advertising or marketing messages, except as part of a specific program or function that you can previously activate or block.

However, we may use your email address without your consent in the following cases:

— Registration as a member of the Site: the new User member receives a letter welcome email containing a link to activate your Account;

— Password reset: the User, in the event of loss of his password, can request a password reset, a reset email will then be sent to him;

— Changing the password: each time the User changes the password, an email confirming the action is sent;

— Closing the Account: In the event of a request made to OPALITE by the User for the definitive closure or temporary deactivation of their Account, a notification email may be sent by the Site to inform them of the completion of the requested operation;

— Events, Games and Competitions: OPALITE may send the User emails to inform him/her of the existence of games and competitions or special events organized by the Site;

— Information on the Site and the Services offered: OPALITE may send the User emails to inform them of developments on the Site, send them newsletters and notifications of the Services to which they are registered;

— Request for assistance or submission of questions/suggestions: OPALITE responds by email to the User who requests assistance to connect to the Site, modify or access to his Account or for any comments or suggestions submitted to OPALITE using the “Contact Us” section available on the Site.

Important :

- None of the processing operations listed above have the purpose of any automated decision-making, including profiling, concerning you;
- At certain times, we may ask for your consent to use your Data for certain very specific reasons (new purpose, modification or deletion of existing purpose). You naturally remain free to accept or not this request;
- At any time, you may decide to withdraw your consent to all or part of the processing listed above by changing some of the settings available in your Account profile page or by sending your request to the Company (as part of the exercise of your rights as provided for in Article 8 below). However, you must keep in mind that some parts of the Site and some Services will then be unavailable.

## 5. DATA RECIPIENT

OPALITE is committed to protecting your privacy and the confidentiality of your Data. Consequently, we undertake to never share or disclose your Data to third parties, except in the following situations, which are exhaustively listed:

- When we are compelled to do so by a judicial authority, police authorities and, in general, by any administrative authority authorized by law;
- When you have given us your prior consent to share this information;
- When you violate our General Terms and Conditions of Use (we are thus able to transmit your IP address to access providers for identification purposes — and thus obtain your possible deletion — or even, if we deem it necessary given the nature of your abuse, transmit your IP address directly to the competent authorities).

## 6. DATA SECURITY AND RETENTION PERIOD

### 6.1. Security

Concerned about the trust shown by the User when he connects to our Site, we attach great importance to the security and protection of his Data and implement all the technical and organizational measures necessary for the purposes of:

- restrict the risks of loss, deterioration or misuse,
- and prevent any violation thereof.

Thus, in order to guarantee optimal security, OPALITE uses the standard SSL (Secure Socket Layer) technology in 256 bits. The use of the SSL protocol, one of the most effective and widely used encryption methods currently, guarantees maximum protection of your Data. Furthermore, still within the framework of this security policy, we inform you that:

- Your User account is protected by a personal password stored encrypted in our database;
- A secure cookie system is made available to you to make any attempt to steal your cookies ineffective;
- Your email address is only accessible to the Site administrator, as well as to our webmasters if you have accepted that OPALITE contacts you by email;
- In accordance with the provisions of the GDPR, we will notify the supervisory authority (the CNIL) of any potential breach of personal data of which we may be a victim despite our security measures and will notify you, where applicable, of any potential breach concerning your Data in particular, if this breach results in a high risk for your rights and freedoms.

## 6.2. Data retention period

Your Data is stored with the Site host and is kept for the period strictly necessary for the management of the commercial relationship between us, in compliance with the purposes set out in Article 5 of this Charter, and to the sole extent authorized by the regulations in force.

Beyond this period, they will be anonymized and kept for statistical purposes and will not give rise to any exploitation of any nature whatsoever.

## 7. PARTNER SITES

You can access, via the hyperlinks on the Site, Partner sites that are not governed by these Data Protection provisions. You are therefore invited to review the rules applicable to the use and disclosure of the information you have communicated on these sites.

## 8. RIGHTS OF ACCESS, MODIFICATION AND DELETION OF YOUR DATA

OPALITE complies with the regulations applicable to the processing of personal data and in particular the European Data Protection Regulation No. 2016/679 of April 27, 2016 (hereinafter referred to as the "GDPR").

Thus, in accordance with the Data Protection Act and the GDPR, you have at any time:

- (1) A right of access: you can, by providing proof of your identity, obtain communication of data concerning you and check their accuracy.
- (2) A right of rectification: in the event of inaccuracy of this information, you can demand that it be rectified, completed, updated, locked or deleted.
- (3) A right to erasure ("right to be forgotten"): you can obtain the erasure, as soon as possible, of data concerning you.
- (4) A right to limit processing: you can, in certain cases provided for by the regulations, obtain the limitation of the processing of data concerning you.
- (5) From a right to data portability: you can, under the conditions set by the regulations, demand the transmission of data concerning you to another data controller, without the Company which initially collected them being able to oppose this.
- (6) A right of opposition: you have the possibility to oppose the processing of data concerning you or to refuse the communication of information concerning you to third parties.

You can exercise these rights either by postal mail addressed to the Company at the following address:

**"OPALITE LIMITED"**  
Efesou, 5, Flat / Office 1, 1055, Nicosia, Cyprus

Either by email to the following address: [info@opalite.net](mailto:info@opalite.net)

Furthermore, we inform you that:

— You can choose not to transmit your Data on the Site. In this case, you will be able to freely browse it, but certain parts of the Site and certain functionalities will then be unavailable;

— At any time, you can update or correct your personal information in the profile page of your Account.

## **9. CHILDREN'S PRIVACY**

The Site and the Services are only accessible to users, natural persons of legal age or legal entities, acting in a professional capacity. We therefore do not authorize users under the age of 18 and do not knowingly collect personal data from any minors under the age of 18, who are subject to specific protection under the GDPR.

## **10. UPDATES TO THE PRIVACY POLICY**

OPALITE may modify this Privacy Policy at any time.

Any changes to the Policy will be posted on this page. If the changes are significant, OPALITE will provide you with more substantial notice (e.g., email notification).

## **11. QUESTIONS, COMPLAINTS OR SUGGESTIONS**

We want to provide you with the greatest clarity, precision and efficiency regarding the confidentiality of your Data. Also, for any questions, suggestions or other concerns regarding the processing of Data or the way in which OPALITE collects and uses Data concerning you, do not hesitate to contact us about this via the "Contact Us" section of the Site.