

FunFunding Privacy & Cookie Policy

FunFunding Privacy Policy

Effective date: 1 September 2020

We respect your right to privacy. Please read this privacy policy carefully because it explains in detail how we collect, use and disclose your personal data, and what choices you have with respect to your personal data.

1. GENERAL INFORMATION

In this section, we provide you with general information about the entity that is responsible for your personal data, this privacy policy, and FunFunding.

1.1 About the Privacy Policy. This FunFunding Privacy Policy (the “**Privacy Policy**”) governs the processing of personal data collected from individual users (“**user**”, “**you**” and “**your**”) through the website <https://www.funfunding.org>, the related software applications and services (collectively, “**FunFunding**”). This Privacy Policy does not apply to any third-party applications or software that integrate with FunFunding or any other third-party products, services or businesses.

1.2 Data controller. The company that is responsible for the processing of your personal data through FunFunding is FUN FUNDING LTD, a registered company in Israel. the company registration number 515735363 (“**we**”, “**us**”, and “**our**”). We act as a data controller with regard to your personal data collected through FunFunding.

1.3 What is FunFunding? FunFunding is an online platform that offers casual games and participation in game tournaments (the “**Tournaments**”). Please see section (5) of our Terms of Service **RULES OF THE TOURNAMENTS AND DONATIONS** for more information.

1.4 Your consent to the Privacy Policy. Before you submit any personal data through FunFunding, you are encouraged to read this Privacy Policy that is always available on FunFunding. In some cases, we may seek to obtain your consent for the processing of your personal data. For example, we may seek your prior consent in the following instances:

- If we intend to collect other types of personal data that are not mentioned in this Privacy Policy;
- If we intend to use your personal data for purposes that are not indicated in this Privacy Policy;
- If we would like to disclose or transfer your personal data to third parties that are not specified in this Privacy Policy; or
- If we significantly amend this Privacy Policy.

1.5 Children. FunFunding should not be accessed and used by persons under the age of 13 (Users located outside the European Union) or the age of 16 (Users located in the European Union); therefore, we do not collect personal data of persons under the age of 13 or 16.

1.6 Cookies. To ensure the best possible user experience, we use cookies on FunFunding. For detailed information about our cookies, please refer to our cookie policy available at <https://www.funfunding.org/privacy-policy>.

2. TYPES AND PURPOSES OF PERSONAL DATA

We collect only a minimal amount of personal data that is necessary for ensuring your proper use of FunFunding. We use your personal data for specified and limited purposes. In this section, we explain what personal data we collect from you, for what purposes we use that data, and on what lawful bases we rely when processing personal data.

2.1 Types of personal data. We comply with data minimisation principles. Thus, we collect only a minimal amount of personal data that is necessary for your use of FunFunding. The list of the types of personal data that we collect from you is provided in Section 2.3 below.

2.2 Purposes of personal data. We process your personal data only for specified and legitimate purposes explicitly mentioned in this Privacy Policy. In short, we will use personal data only for the purposes of enabling you to use FunFunding, maintaining and improving FunFunding, conducting research about our business activities, and replying to your enquiries. We will not use your personal data for any purposes that are different from the purposes for which your personal data was provided.

2.3 Overview of types and purposes of your personal data. The table below provides a detailed description of the types of personal data that we collect, the purposes for which we use it, and the legal bases on which we rely when processing personal data.

Personal data	Purpose	Legal bases
When you ask us to join a tournament, we collect your: <ul style="list-style-type: none">• Name;• Email address; and• Any information that you decide to provide in your message.	<ul style="list-style-type: none">• To enable your access to FunFunding;• To deliver the requested services;• To contact you, if necessary; and• To analyse and improve our business.	<ul style="list-style-type: none">• Performing a contract with you; and• Pursuing our legitimate business interests (to administer and improve our business).
When you contact us by email or through the contact form, we collect your: <ul style="list-style-type: none">• Full Name;• Email address;• Phone number; and• Any information or personal data that you decide to provide us in your message.	<ul style="list-style-type: none">• To respond to your enquiries; and• To provide you with the requested information.	<ul style="list-style-type: none">• Pursuing our legitimate business interests (to grow and promote our business); and• Your consent (for optional personal data).

<p>When you use FunFunding, we collect your:</p> <ul style="list-style-type: none"> • IP address; and • Your approximate location. 	<ul style="list-style-type: none"> • To analyse, improve, and evaluate our business activities; • To customise FunFunding for your location; and • To ensure security of FunFunding. 	<ul style="list-style-type: none"> • Pursuing our legitimate business interests (to analyse and improve our business activities and ensure security)
<p>When you participate in a group related to FunFunding, we may have access to your:</p> <ul style="list-style-type: none"> • Name; • Photo; and • Any information that you decide to provide in the group. 	<ul style="list-style-type: none"> • To analyse, improve, and evaluate our business activities; • To facilitate your participation in tournaments; and • To ensure security of FunFunding. 	<ul style="list-style-type: none"> • Performing a contract with you; and • Pursuing our legitimate business interests (to improve our business and ensure security).

2.4 Additional data. From time to time, we may receive certain additional data if you participate in a focus group, contest, activity or event, request support, interact with our social media accounts, submit your feedback and reviews or otherwise communicate with us. Please note that the provision of such data is optional and you may choose what personal data you would like to share with us. We kindly request you to exercise your due diligence when making your personal data publicly available. We will use such personal data to reply to you, provide you with the requested services, or for pursuing our legitimate business interests (i.e., to analyse and improve our business).

2.5 Sensitive data. We do not collect, under any circumstances, special categories of personal data (“sensitive data”) from you, such as your health information, opinion about your religious and political beliefs, racial origins, membership of a professional or trade association, or information about your sexual orientation, unless you decide to provide such sensitive data, at your own sole discretion.

2.6 Failure to provide personal data. If you fail to provide us with the personal data when requested, we may not be able to perform the requested operation and you may not be able to use the full functionality of FunFunding, receive the services provided through FunFunding, or get our response.

2.7 Personal data made public. If you decide to publish information about yourself in groups related to FunFunding, you may decide to reveal certain personal data. Please keep in mind that such data will become available to other users of FunFunding. Therefore, we request you to exercise your due diligence and not to disclose your personal data that is not necessary, extensive, or sensitive as such data can be used by third parties for unlawful purposes. Also, please note that you are not allowed to publish personal data pertaining to other persons if they have not provided you with their prior consent to disclose such data. We will take immediate steps to remove your messages from FunFunding if we become aware that they contain personal data disclosed unlawfully.

2.8 Privacy of communication. FunFunding allows you to exchange messages in groups related to FunFunding. We put reasonable efforts to ensure that any communication data transmitted through FunFunding remains confidential and properly protected. Moreover,

we do not intentionally and directly access, manage, correct, delete, share, or disclose your messages, unless it is strictly necessary for provision of FunFunding, enforcement of our terms of service, or we are requested by law enforcement agencies to do so. You are solely responsible for any communication through FunFunding and the content of your messages.

3. NON-PERSONAL DATA

When you use FunFunding, we collect some technical data about your device and visits. In this section, we inform you what non-personal data we collect from you and for what purposes we use that data.

3.1 What non-personal data do we collect? When you use FunFunding, we automatically collect certain technical non-personal data about your use of FunFunding for analytics purposes. Please note that de-identified personal data is also considered to be non-personal data. Although such non-personal data allows us to analyse your use of FunFunding, it does not allow us to identify you. The non-personal data collected by us includes the following information:

- The type of device that you use;
- Operating system that you use;
- The browser that you use;
- URL address clicked from FunFunding; and
- Your other online behaviour data.

3.2 Your feedback. If you contact us, we may keep records of any questions, complaints, recommendations, or compliments made by you and the response, if any. Where possible, we will de-identify your personal data.

3.3 How do we use non-personal data? We will use non-personal data for the following purposes:

- To analyse what kind of users visit and use FunFunding;
- To examine the relevance, popularity, and engagement rate of the content available on FunFunding;
- To investigate and help prevent security issues and abuse;
- To develop and provide additional features to FunFunding; and
- To personalise FunFunding for your specific needs.

3.4 Aggregated and de-identified data. In case your non-personal data is combined with certain elements of your personal data in a way that allows us to identify you, we will handle such aggregated data as personal data. If your personal data is aggregated or de-identified in a way that it can no longer be associated with an identified or identifiable natural person, it will not be considered personal data and we may use it for any business purpose.

4. MARKETING COMMUNICATION

From time to time, you may receive promotional messages from us. In this section, we explain when you may receive notices from us and what you can do to decline our commercial communication.

4.1 Marketing messages. To keep you updated about the latest developments related to FunFunding, our new services, additional features of FunFunding, and our special offers, we may send you marketing messages, such as newsletters, brochures, promotions and advertisements. You will receive such marketing messages or be contacted by us for marketing purposes only if:

- We receive your express (“opt-in”) consent to receive marketing messages (please note that your voluntary subscription to our newsletters and updates substitutes such consent); or
- We decide to send you marketing messages about our new services that are closely related to the services already used by you.

4.2 Opting-out. You can opt-out from receiving marketing messages at any time free of charge by clicking on the “unsubscribe” link contained in any of the messages sent to you or by contacting us directly.

4.3 Informational notices and service updates. From time to time (if we have your email address), we may send you important informational notices, such as service-related, technical or administrative emails, information about FunFunding, your privacy and security, and other administrative matters. Please note that we will send such notices on an “if-needed” basis and they do not fall within the scope of direct marketing communication that requires your prior consent.

5. HOW LONG DO WE KEEP YOUR DATA?

We store your personal data only if it is necessary for its specific and limited purposes. In this section, we specify the time period for which we keep your personal and non-personal data in our systems.

5.1 Retention of personal data. We will store your personal data in our systems only until such personal data is required for the purposes described in this Privacy Policy or you request us to delete your personal data, whichever comes first. After your personal data is no longer necessary for its purposes and there is no other legal basis for storing it, we will immediately securely delete your personal data from our systems.

5.2 Retention of non-personal data. We may retain non-personal data pertaining to you for as long as necessary for the purposes described in this Privacy Policy. This may include keeping non-personal data after you have deactivated your user account for the period of time needed for us to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

5.3 Retention as required by law. Please note that, in some cases, we may be obliged by law to store your personal data for a certain period of time. In such cases, we will store your personal data for the time period stipulated by the applicable law and delete the personal data as soon as the required retention period expires.

6. HOW DO WE SHARE AND DISCLOSE DATA?

We may need to cooperate with external service providers and share some personal data with them. In this section, you can find information about third parties that have access to your personal data and the instances when we make data transfers.

6.1 Do we disclose your personal data? If necessary, we will disclose your personal data to the service providers with whom we cooperate (our data processors). For example, we may share your personal and non-personal data with entities that provide certain technical support services to us, such as business analytics, advertising, and email distribution services, or if you explicitly request us to disclose the personal data.

6.2 When do we disclose your personal data? The disclosure of your personal data is limited to the situations when such data is required for the following purposes:

- Ensuring the proper operation of FunFunding;
- Ensuring the delivery of the services requested by you;
- Providing you with the requested information;
- Pursuing our legitimate business interests;
- Enforcing our rights, preventing fraud, and security purposes;
- Carrying out our contractual obligations;
- Law enforcement purposes; or
- If you provide your prior consent to such a disclosure.

6.3 With what data processors do we share your personal data? We will share your personal data only with the data processors that agree to ensure an adequate level of protection of personal data that is consistent with this Privacy Policy and the applicable data protection laws. The data processors that will have access to your personal data are:

- Our hosting service provider Google (<https://www.google.com>) located in the United States;
- Our business analytics service providers GoogleAnalytics (<https://analytics.google.com>) and MixPanel (<https://mixpanel.com>) located in the United States;
- Our transactional email service providers Gmail (<https://www.gmail.com>) located in the United States; and
- Our Web development and communication partner Wix (<https://www.wix.com>) located in Israel.

6.4 Sharing of non-personal data. Your non-personal data may be disclosed to third parties for any purpose. For example, we may share it with prospects or partners for business or research purposes, for improving FunFunding, responding to lawful requests from public authorities or developing new products and services.

6.5 Legal requests. If requested by a public authority, we will disclose information about the users of FunFunding to the extent necessary for pursuing a public interest objective, such as national security or law enforcement.

6.6 Successors. In case our business is sold partly or fully, we will provide your personal data to a purchaser or successor entity and request the successor to handle your personal data in line with this Privacy Policy.

7. INTERNATIONAL TRANSFERS OF PERSONA DATA

Your personal data may be transferred outside the country where you reside. In this section, we explain when we transfer personal data abroad and what safeguards we implement to ensure that your personal is properly protected.

Some of our data processors listed in Section 6 of this Privacy Policy are located outside the country in which you reside. For example, if you reside in the European Economic Area (EEA), we may need to transfer your personal data to jurisdictions outside the EEA. In case it is necessary to make such a transfer, we will make sure that the jurisdiction in which the recipient third party is located guarantees an adequate level of protection for your personal data (e.g., the recipient is a Privacy-Shield certified entity) or we conclude an agreement with the respective third party that ensures such protection (e.g., a data processing agreement based pre-approved standard contractual clauses).

8. PROTECTION OF PERSONAL DATA

We put our best efforts to keep your personal data safe and secure. In this section, we inform you about our technical measures that help us to protect your personal data.

8.1 Our security measures. We implement organisational and technical information security measures to protect your personal data from loss, misuse, unauthorised access, and disclosure. The security measures taken by us include secured networks, SSL protocol, strong passwords, limited access to your personal data by our staff, and anonymisation of personal data (when possible). In order to ensure the security of your personal data, we kindly ask you to use FunFunding through a secure network only.

8.2 Handling security breaches. Although we put our best efforts to protect your personal data, given the nature of communications and information processing technology and the Internet, we cannot be liable for any unlawful destruction, loss, use, copying, modification, leakage, and falsification of your personal data caused by circumstances that are beyond our reasonable control. In case a serious breach occurs, we will take reasonable measures to mitigate the breach, as required by the applicable law. Our liability for any security breach will be limited to the highest extent permitted by the applicable law.

9. YOUR RIGHTS REGARDING PERSONAL DATA

You have the right to control how we process your personal data. Below, we list the rights that you can exercise with regard to your personal data and explain how you can exercise those rights.

9.1 What rights do you have? Subject to any exemptions provided by law, you may ask us to:

- Get a copy of your personal data that we store;
- Get a list of purposes for which your personal data is processed;
- Rectify inaccurate personal data;
- Move your personal data to another processor;
- Delete your personal data from our systems;
- Object and restrict processing of your personal data;

- Withdraw your consent, if you have provided one; or
- Process your complaint regarding your personal data.

9.2 How to exercise your rights? Please contact us by email at community@funfunding.org and explain in detail your request. In order to verify the legitimacy of your request, we may ask you to provide us with an identifying piece of information, so that we would be able to identify you in our system. We will answer your request within a reasonable timeframe but no later than 2 weeks.

9.3 How to launch a complaint? If you would like to launch a complaint about the way in which we handle your personal data, we kindly ask you to contact us first and express your concerns. After you contact us, we will investigate your complaint and provide you with our response as soon as possible. If you are not satisfied with the outcome of your complaint, you have the right to lodge a complaint with your local data protection authority.

10. TERM, TERMINATION, AND AMENDMENTS

This Privacy Policy may be changed or terminated at any time. In this section, we explain for how long this document is valid and how you will be informed about any changes.

10.1 Term and termination. This Privacy Policy enters into force on the effective date indicated at the top of the Privacy Policy and remains valid until terminated or updated by us.

10.2 Amendments. The Privacy Policy may be changed from time to time to address the changes in laws, regulations, and industry standards. The amended version of the Privacy Policy will be posted on this page and, if we have your email address, we will send you a notice about all the changes implemented by us. We encourage you to review our Privacy Policy to stay informed. For significant material changes in the Privacy Policy or, where required by the applicable law, we may seek your consent. If you disagree with the changes to the Privacy Policy, you should cease using FunFunding.

11. CONTACT US

You can contact us at any time to receive further clarifications. Our contact details are specified below.

Please feel free to contact us if you have any questions about the Privacy Policy, our privacy and security practices, or would like to exercise your rights listed in Section 9 of the Privacy Policy. You may contact us by using the following contact details:

Email: community@funfunding.org

Contact form: <https://www.funfunding.org>

FunFunding Cookie Policy

Effective date: 1 September 2020

We use cookies on <https://www.funfunding.org> and the related software applications (collectively, “**FunFunding**”). In this cookie policy (the “**Cookie Policy**”), you can find information about the types of cookies that we use and the purposes for which we use them. If you do not agree with our use of cookies, please disable your cookies as described in the section “How to disable cookies?” Please beware that the full functionality of FunFunding may not be available without cookies.

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1. Responsible entity (data controller)

The data controller that is responsible for the processing of your personal data through FunFunding is FUN FUNDING LTD, a registered company in Israel and the company registration number 515735363 (“**we**”, “**us**”, and “**our**”).

2. What is a cookie?

A cookie is a small piece of data typically consisting of letters and numbers. When you visit a website, the website may send a cookie to your browser. Subsequently, the browser may store the cookie on your computer or mobile device for a certain period of time. Cookies are designed to allow the recognition of your device and collection of certain information about your use of a website. Thus, over time, cookies allow websites to “remember” your actions and preferences. There are several types of cookies, namely, (i) persistent cookies, which remain valid until deleted by you, (ii) cookies that remain valid until their expiration date, and (iii) session cookies that are stored on a web browser and remain valid until the moment the browser is closed. Cookies may also be (i) first-party cookies (set by the website itself) and (ii) third-party cookies (placed by third-party websites).

3. What cookies do we use?

We use two types of cookies on FunFunding, namely:

- **Technical cookies**, which are essential to ensure the correct functioning of FunFunding and to provide the services requested by you;
- **Statistics cookies** that allow us to generate statistical reports about how you use FunFunding; and
- **Marketing cookies** that allow us to create and implement our digital marketing campaigns.

The table below provides an overview of our cookies, including their purpose and expiration time.

Strictly necessary (technical) cookies				
Name	Type	Provider	Expiration	Purpose
beatSessionID beatSessionTs	First-party HTML cookies	FunFunding	Persistent	The cookies are used to register which server-cluster is serving you. This is used in the context of load-balancing in order to optimise your user experience.
hs XSRF-TOKEN	First-party HTTP cookies	FunFunding	End of session	The cookies are used to prevent cross-site request forgery. The cookies are essential for your and FunFunding’s security.
ssr-caching	First-party HTTP cookie	FunFunding	1 day	The cookie is used for the cache function to optimise the response time between you and FunFunding.
XSRF-TOKEN	Third-party HTTP cookie	wix.com	End of session	The cookie is used for the cache function to optimise the response time between you and FunFunding.
TS#	First-party HTTP cookie	FunFunding	1 day	Unclassified

TS#	Third-party HTTP cookie	wix.com	End of session	Unclassified
Statistics cookies				
Name	Type	Provider	Expiration	Purpose
_ga	First-party HTTP cookie	FunFunding	2 years	The cookie is used to set a unique ID that is used to generate statistical data on how you use FunFunding.
_gat	First-party HTTP cookie	FunFunding	1 day	The cookie is used by Google Analytics to throttle request rate.
_gid	First-party HTTP cookie	FunFunding	1 day	The cookie is used to set a unique ID that is used to generate statistical data on how you use FunFunding.
fedops.logger.sessionId	First-party HTML cookie	FunFunding	Persistent	The cookie is used to register statistical data on your behaviour and conduct internal analytics.
Marketing cookies				
Name	Type	Provider	Expiration	Purpose
svSession	First-party HTTP cookie	FunFunding	2 years	The cookie is used to track you across all wix.com sites. The information collected can be used to make advertisements more relevant for you.

4. Cookie consent

When you visit FunFunding for the first time, we may ask you to provide us with your consent to our use of cookies via a cookie consent banner. If you do not provide your consent to our use of all cookies, we may serve you technical cookies only that are strictly necessary to ensure the proper functioning of FunFunding. The use of such cookies does not require your consent. Please note that we may not be able to provide you with the best possible user experience if not all cookies are enabled.

5. How to disable cookies?

When we ask you to provide your consent to our use of statistics and marketing cookies, you have the freedom not to provide such consent. If you would like to refuse our use of cookies on FunFunding, you can do it at any time by declining cookies in your browser or device. Please note that some parts of FunFunding may not function properly without cookies and you cannot decline

strictly necessary technical cookies. It may be helpful to consult the cookie management instructions of your browser:

- **Apple Safari:** <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- **Google Chrome:** <https://support.google.com/chrome/answer/95647>
- **Firefox:** <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- **Internet Explorer:** <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>
- **Microsoft Edge:** <https://support.microsoft.com/en-us/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy>

6. Contact us

If you have any questions about this Cookie Policy, please contact us:

Email: community@funfunding.org

Contact form: <https://www.funfunding.org>