

PRIVACY POLICY

Last updated: September 11, 2024

We are TonBox Project (hereinafter “**Project**” or “**We**”) and this Privacy Policy describes the measures that we take to preserve and safeguard your privacy when you visit our website located <https://tonbox.me/> or use our website, content and any other services that we provide to You (“services”). It also demonstrates how we may process data in accordance with the EU General Data Protection Regulation (“GDPR”).

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it.

By providing access to the website, content and services we, acting reasonably and in good faith, believe that You: (a) have all necessary rights to use the website, content and services; (b) provide true information about yourself to the extent necessary for use of the website, content and services; (c) understand that by the posting your personal information you have manifestly made this information public, and this information may become available to other website users and internet users, be copied and disseminated by them; (d) understand that some types of information transferred by you to other website and service users cannot be deleted by you or us; (e) are aware of and accept this Privacy Policy.

We do not check the user information received from You, except where such a check is necessary in order for us to fulfill our obligations to You.

For the purpose of the GDPR, the data controller is the Project and we are committed to protecting the privacy of all individuals in respect of whom we hold personal data. If You do not agree with our policies and practices, your only recourse is not to use our website or services.

“Personal data” refers to information that identifies You or that can be used to contact You (online or offline). Personal data can include but not limited to your name, email address, physical address, Internet Protocol (IP) address, telephone number, birthdates’, etc.

This Privacy Policy governs personal data and non-personal data, which we collect from You when you're using our website and services. We maintain reasonable and appropriate security safeguards designed to protect your information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the information.

Collection of information

Information You provide to us

We may collect the following personal data: (a) when You provide feedback about our services. These data include information that you post, comment, share content or like in any of our forums, social networks, and on the website; (b) we collect personal data whenever You contact us and provide us with information that we are able to identify You by. This includes information such as your name, email address, and phone number, that You give us by corresponding with us by email or otherwise; (c) in order to fix crashes and other technical issues that may arise while You are using our services, as well as to make our services more suitable for You, we collect, store and use information about the device You are using the services on, including what type of device it is, what hardware and operating system You are using, the device settings, unique device identifiers, and crash data; (d) in order to help us improve our services and your experience, including by monitoring aggregate metrics such as total number of visitors, traffic, and demographic patterns.

Non-personal information. We indirectly collect a variety of information through your interaction with and use of our website and services. This information may include, but is not limited to, anonymized browser and device information (both software and hardware), data collected through automated electronic interactions, application usage data, demographic information, geographic, geo-location information, statistical and aggregated information. Statistical or aggregated information does not directly identify a specific person, but it may be derived from personal data.

We do not collect or process any special categories of personal data. We do not undertake automated decision making or profiling on the data which are provided to us.

Cookies

We use cookies and similar technologies or local shared objects (“flash cookies”), to deliver, measure, and improve our services in various ways.

A cookie is a small text file that identifies your computer on our server. Cookies in themselves do not identify the individual user, only the computer being used. Cookies are not used to collect personal information.

Cookies or similar technologies can tell us which language You prefer and what your communications preferences are. They also provide You with features, insights, and customized content.

We may use cookies or similar technologies to help us deliver marketing campaigns and track their performance. Similarly, our partners may use cookies to provide us with information about your interactions with their services and action tags to measure advertising effectiveness and allow more effective targeted advertising, but use of those third-party cookies would be subject to the service provider’s policies.

Cookies or similar technologies help us learn how well our websites and services perform. We also use cookies or similar technologies to understand, improve, and research products, features, and services, also to create logs and record when you access our website from different devices, such as your computer or your mobile device.

Third Party Analytics Providers. We may use third-party analytics providers software to allow us to better understand the functionality of our website including but not limited to, Google Analytics. This software may record information such as how often You use the website. The information about your use of our website, may be transmitted to and stored by Third-Party Analytics Providers’ servers, which may also be located outside of the EEA. We can use the cookies to help us develop and improve our website. The information gathered and statistics, however, do not include details that can be used to identify you. By continuing to use our website, you are accepting our use of these cookies that make advertising and communications more relevant to you and your interests.

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our website and services.

Use of information

We use the information we collect to provide, maintain and improve our services. We may also use the information we collect to:

- send you technical notices, updates, security alerts, and support and administrative messages and to respond to your comments, questions, and customer service requests;
- communicate with you about products, games, services, offers, and events offered by the Project, and provide news and information we think will be of interest to you;
- monitor and analyze trends, usage, and activities in connection with our website and services;
- detect, investigate and prevent fraudulent act and other illegal activities and protect the rights and property of the Project and others;
- improve the services and provide content, or features that we think will be of interest to our users; and
- compliance with any contractual, legal or regulatory obligations under any applicable law.

Your personal information may also be processed if it is required by a law enforcement or regulatory authority, body or agency or in the defense or exercise of legal claims. We will not delete personal information if it is relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved and/or during the term that is required and/or permitted by applicable/relevant law.

If we intend to further process your data for any other purpose to those set out in this Privacy Policy, we shall provide you with details of this further purpose before we commence processing.

Sharing of information

For the performance of a contract with You, compliance with a legal obligation to which we are subject, and based on our legitimate interests, we may share your personal data with the following categories of third parties:

- Our Affiliates. Our affiliates may access your personal data to help us develop, maintain and provide our website and services and help manage our customer relationships.
- Service Providers. Our service providers provide us support for our services, including, for example, website and application development, hosting, maintenance, backup, storage, analysis and other services for us, which may require them to access or use personal data.
- Advertising and Advertising Measurement Partners: we may share your email, nickname, IP address and other information you provide to us in order to facilitate targeting, delivery, and measurement of online advertising on third-party services, or otherwise facilitate the transmission of information that may be useful, relevant, or of interest to you.
- Professional Advisers. Our lawyers, accountants, bankers, auditors and insurers may need to review your personal data to provide consultancy, compliance, banking, legal, insurance, accounting and similar services.

- **Legal Authorities.** We may disclose your personal data if we believe it is reasonably necessary to comply with a law, regulation, order, subpoena, rule of a self-regulatory organization or audit or to protect the safety of any person to address fraud, security or technical issues, or to protect our legal rights, interests and the interests of others.
- **Business Partners.** We may share certain information such as your location, browser and cookie data and other data relating to your use of our website and services with our business partners to deliver personalized advertisements that may be of interest to you. These third-party ad servers or ad networks use technology to send, directly to your browser, computer or mobile device, these personalized ads and ad links, and will automatically receive your IP address when they do so.
- **Researchers.** To enhance the public understanding of patterns and trends in the markets served by our website and service, we may provide personal data to third parties under confidentiality obligations such as, for example, academics or contractors for research purposes.

We may also share non-personal data (such as anonymous usage data, platform types, number of clicks, etc.) with interested third parties to help them understand the usage patterns for certain services or conduct independent research based on such anonymous usage data.

Privacy settings

The website and services may contain links to sites operated by third parties. We are not responsible for your data privacy when You access these links or engage with third party services and You should ensure You review the relevant third party's privacy statement which will govern your data privacy rights.

We bear no liability for the actions of third parties which, as the result of your use of the internet or the services, obtain access to your information in accordance with the confidentiality level selected by You.

We bear no liability for the consequences of use of the information which, due to the services nature, is available to any internet user. We ask You to take a responsible approach to the scope of their information posted on the website.

International data transfers

Our service is global by nature and your data can therefore be transferred to anywhere in the world. We transfer, process and store your information outside of your country of residence, to wherever we or our third-party service providers operate for the purpose of providing you the services. Whenever we transfer your information, we take steps to protect it.

In addition, data may be transferred to our subsidiaries or processors in third countries or subcontractors of our processors in third countries. Some of the third parties described in this Privacy Policy that provide services to us under contract, are based in other countries that may not have privacy and data protection laws equivalent to those of the country in which you reside. In the event your personal information is transferred, stored or processed outside of the EEA, we will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy and GDPR.

Your rights

You have the following rights, in certain circumstances, in relation to your personal information: (a) right to access your personal information; (b) right to rectify your personal information: you can request that we update, block or delete your personal data, if the data is incomplete, outdated, incorrect, unlawfully received or no longer relevant for the purpose of processing; (c) right to restrict the use of your personal information; (d) right to request that your personal information is erased; (e) right to object to processing of your personal information; (f) right to data portability (in certain specific circumstances); (g) right not to be subject to an automated decision; (h) right to lodge a complaint with a supervisory authority.

You also have a right to independently remove personal information on your account and make changes and corrections to your information, provided that such changes and corrections contain up-to-date and true information. You can also view an overview of the information we hold about You.

If You would like to exercise these rights, please contact us at info@tonbox.me or send your request in writing to Kypranoros, 13, EVI BUILDING, 2nd floor, Flat/Office 201, Nicosia, Cyprus. We will aim to respond to you within 30 business days from receipt of request. We will need to verify your identity before we are able to disclose any personal data to You.

Age restriction. You may use the website and services only if you are over the age of eighteen (18). We recognize the privacy interests of children and encourage parents and guardians to take an active role in their children's online activities and interests. If we learn that we've collected personal data from a child under the age at which under the applicable law a child cannot give their own consent, we will take reasonable steps to delete it. Parents who believe that we may have collected personal data from a child can submit a request that it be removed, please contact us directly at info@tonbox.me.

Changes to this Policy

From time to time, we may change and/or update this Privacy Policy. If this Privacy Policy changes in any way, we will post an updated version on this page. We will store the previous versions of this Privacy Policy in our documentation. We recommend You regularly review this page to ensure that You are always aware of our information practices and any changes to such.

Notice to California residents

The California Consumer Privacy Act (“CCPA”) provides additional rights to know, delete and opt-out, and requires businesses collecting or disclosing personal information to provide notices and means to exercise rights. We do not generally sell information as the term “sell” is traditionally understood. To the extent “sale” under the CCPA is interpreted to include the activities set out in this Privacy Policy, we will comply with applicable law as to such activity. We disclose the following categories of personal information for commercial purposes: identifiers, customer records, commercial information, internet activity, geolocation data, and inferences drawn. You have the right to know certain details about our data practices in the past 12 months. In addition, you have the right to delete the personal information we have collected from you. To exercise any of these rights please submit a request via email at info@tonbox.me. In the request, please specify which right you are seeking to exercise and the scope of the request. We may require specific information from you to help us verify your identity and process your request.

Contact Us

If You have any questions, please send your inquiries to us at info@tonbox.me or send your request in writing to Kypranoros, 13, EVI BUILDING, 2nd floor, Flat/Office 201, Nicosia, Cyprus. So that we can deal with your enquiry effectively, please quote relevant provisions of this Privacy Policy. We will aim to respond to You within 30 business days from receipt of request.

All correspondence received by us from You (written or electronic inquiries) is classified as restricted-access information and may not be disclosed without your written consent. The personal data and other information about you may not be used without your consent for any purpose other than for response to the inquiry, except as expressly provided by law.

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