

## Privacy Policy

Last updated: May 28, 2018

This is the privacy policy (the “**Policy**”) of the website <https://www.affilistars.com/> (the “**Website**”) operated by Grasswood Entertainments Ltd., of Qormi, Southern Region, Malta (the “**Company**”, “**We,**” “**Us**”, “**Our**”).

The Company is committed to securing your Personal Data and your privacy. According to this commitment We will uphold the following principles:

- To be transparent in respect of the collection and processing of Personal Data about you:

It is important to Us that at all times you will have all of the information required in order for you to make educated decisions about the processing of Personal Data about you. For this purpose, We will make use of various techniques and measures aimed to provide you with relevant information about the processing of Personal Data about you, in the proper manner and timing.

Our complete privacy policy is intended to provide you with the widest understanding of the types of Personal Data collected by Us and the manner in which We process it. It is therefore vital that you will review it at the first possible opportunity and from time to time.

In addition, where We find that you are required to be provided with specific information, We will provide it to you in the appropriate time and place.

We will also be happy to answer any question you have and provide you with any clarification you require, subject to legal limitations. For this purpose, you can contact us via the following email address: [support@affilistars.com](mailto:support@affilistars.com)

- To process Personal Data about you solely for the purposes outlined in the Policy:

The purposes for which We can process Personal Data about you include, inter alia, the operation of Our affiliate program, enhancing the user experience with Our affiliate program, to improve Our affiliate program, to protect Our rights and interests, to perform business and administrative activity that supports the management of Our affiliate program and/or to uphold any legal and/or regulatory requirements. The entire list of the purposes for which We use Personal Data about natural persons is listed in section 7 of the Policy.

- To invest significant resources in order to respect your rights in connection with Personal Data about you:

We apply significant resources in order to allow you to exercise your rights as a data subject. Therefore, you may approach Us any time you wish to review Personal Data about you, to have Us amend it, erase it, cease using it for specific purposes or in general or that We will transfer it to you or to a third party, and We will fulfill your wishes in accordance with the law.

- To secure Personal Data about you:

While We cannot promise absolute protection of the Personal Data about you, We can promise that We use and will continue to use a wide array of means and measures that are aimed ensuring that the Personal Data about you is secured.

Our Complete Privacy Policy

In order to view the entire document, please press [here](#)

## **1. To What Does This Privacy Policy Apply?**

This Policy describes what kind of Personal Data does the Company collect about natural persons, how does it collect it, use it, share it with third parties, secure it, process it etc. For the avoidance of doubt, this Policy does not apply to any data of and/or about legal entities.

In this Policy, any reference to “Personal Data” is to any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or in combination with additional information that We have or that We have access to.

In this policy, wherever We refer to the “processing” of Personal Data, We refer to any operation or set of operations which is performed on Personal Data, including the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## 2. Data Controller

### The Company:

The Company is the data controller in respect of the Personal Data about you.

## 3. When Do We Collect Personal Data About You?

We collect Personal Data about you whenever you use Our affiliate program, use the Website, Our service channels and/or contact Us. In some instances, you will actively provide Us with the Personal Data, and in other instances We will collect the Personal Data about you from examining and analyzing your use of Our affiliate program and/or Our service channels.

## 4. No Obligation To Provide Personal Data To The Company And Its Implications

You are not obligated to provide Us with any Personal Data about you. However, in some instances, not providing such Personal Data will prevent Us from providing you with allowing you to participate in Our affiliate program and/or prevent you from enjoying all aspects of Our affiliate program. Please see below a detailed description of such instances:

**A legal obligation of the Company:** there are certain legal obligations that require the Company to collect certain Personal Data as a precondition to allowing you to participate in Our affiliate program. In these instances, while you are not obligated to provide the Personal Data about you, if you will not provide the Company with such Personal Data, We will not be able to allow you to participate in Our affiliate program.

By way of example, We are required to collect certain information about you as part of AML requirements. While you are not obligated to provide Us with such information, if you will not provide it to Us, We will not be able to allow you to participate in Our affiliate program.

**A contractual obligation of the Company:** in some instances, the Company is contractually obligated to use Personal Data about you. In these instances, while you are not obligated to provide the Personal Data about you, if you will not provide the Company with such Personal Data, We will not be able to provide you with the products and services to which the contractual obligation applies.

By way of example, We may be required to provide Personal Data about you in order to facilitate the payment of your commission.

**Providing Personal Data for the purpose of contracting with you:** in some instances, providing Personal Data about you is a precondition to executing a contract between yourself and the

Company. In these instances, while you are not obligated to provide the Personal Data about you, if you will not provide the Company with such Personal Data, We will not be able to contract with you and therefore will not be able to allow you to participate in Our affiliate program.

By way of example, in order to provide you with certain operational messages, relating to Our affiliate program, We will require to receive your email address.

## **5. What Personal Data About You Do We Collect?**

**Personal Data We collect upon registration:** email address, first name, last name, country of residence, phone number, chat ID / user name, commission structure, preferred payment method and the details of such method.

**Personal Data We collect during your participation in Our affiliate program:** the basis for the calculation of your commission and your commission, payments made to you.

**Personal Data We collect in connection with the registration:** passport / ID / driving license number and photo, utility bill.

**Personal Data We receive from you:** any Personal Data you provide to Us on your own free will when contacting Us. We may record and/or document in writing your calls.

## **6. The Purposes Of The Processing Of Personal Data And Their Legal Basis**

The Company processes Personal Data about you for one or more of the purposes outlined in this section and according to the appropriate legal basis.

The Company shall not process Personal Data about you unless there is a legal basis for such processing. The legal bases according to which the Company may process Personal Data about you are as follows:

- a. **Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.** By way of example, for registering you with Our affiliate program, or for allowing you to receive payment of your commission.
- b. **Processing is necessary for compliance with a legal obligation to which the Company is subject.** By way of example, in connection with any AML obligations.

- c. **Processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party.** By way of example, for the purpose of improving Our Affiliate Program, or for the exercise or defense of legal claims.

Whenever the processing of Personal Data about you is necessary for the purpose of the legitimate interests pursued by the Company or by a third party, the processing is conditional upon such interests not overridden by your interests or fundamental rights and freedoms which require protection of Personal Data about you. At any time, you may approach Us by sending a notice to the following email address [support@affilistars.com](mailto:support@affilistars.com) in order to receive information concerning the review performed by Us in order to reach the conclusion that We may process the Personal Data about you on account of such processing being necessary for the purposes of the legitimate interests pursued by the Company or by a third party.

The following list outlines the purposes for which We may process Personal Data about you and the legal basis for any such processing:

<b>Purpose</b>	<b>Legal Basis</b>
1 <b>In order to register you as an affiliate</b> Upon your request to register with the Company as an affiliate, We will process Personal Data about you in order to allow Us to perform such request.	<ul style="list-style-type: none"><li>• Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.</li><li>• Processing is necessary for compliance with a legal obligation to which the Company is subject.</li></ul>
2 <b>In order to contact you for the purpose of operational requirements</b> In some circumstances, We will contact you in order to update you in respect of certain operational matter; for instance, where We will be required to cease to provide Our affiliate program in certain jurisdictions, or where a certain aspect of Our affiliate program is changing. In these circumstances, We will need to use Personal Data about you accordingly.	<ul style="list-style-type: none"><li>• Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.</li><li>• Processing is necessary for compliance with a legal obligation to which the Company is subject.</li></ul>
3 <b>In order to respond to your queries, requests and/or complaints</b>	<ul style="list-style-type: none"><li>• Processing is necessary for the purpose of the legitimate</li></ul>

Processing of Personal Data about you is required in order to respond to queries you have concerning Our affiliate program.

interests pursued by the Company or by a third party.

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| 4 | <b>In order to pay you the commission in connection with Our affiliate program</b>  | <ul style="list-style-type: none"><li>• Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.</li></ul>   |
| 5 | <b>In order to comply with any legal obligations or judicial or administrative orders</b><br><br>We process Personal Data about you in order to comply with Our various legal obligations.  | <ul style="list-style-type: none"><li>• Processing is necessary for compliance with a legal obligation to which the Company is subject.</li></ul>   |
| 6 | <b>In order to improve Our affiliate program</b><br><br>We may use Personal Data about you in order to improve Our affiliate program; such processing will include, inter alia, any comments and complaints received in respect of Our affiliate program, as well as any errors and malfunctions. | <ul style="list-style-type: none"><li>• Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.</li></ul>   |
| 7 | <b>In order to prevent fraud, abusive use of Our affiliate program and to prevent money laundering</b>  | <ul style="list-style-type: none"><li>• Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.</li><li>• Processing is necessary for compliance with a legal obligation to which the Company is subject.</li></ul> |
| 8 | <b>In order to analyze the effectiveness of any marketing and advertising campaigns and activities of the Company</b>   | <ul style="list-style-type: none"><li>• Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.</li></ul>   |
| 9 | <b>In order to perform and maintain various activities supporting Our affiliate program</b><br><br>Such activities include back office functions, business development activities, strategic decision making, oversight mechanisms etc.   | <ul style="list-style-type: none"><li>• Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.</li></ul>   |

- 10 **In order to perform analysis, including statistical analysis**
- We use various analytical measures (including statistical ones) in order to make decisions in various issues.
- Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.
- 11 **In order to protect Our and third parties' interests, rights and assets, including initiation or exercise or defense of legal claims**
- We may process Personal Data about you in order to protect the interests, rights and Assets of Ours and of third parties, according to any law, regulation and agreement, including any of Our terms and conditions and policies.
- Processing is necessary for the purpose of the legitimate interests pursued by the Company or by a third party.

## **7. Your Right To Object To The Processing of Personal Data About You Where Such Processing Is Necessary For The Purpose Of The Legitimate Interests Pursued By The Company Or By A Third Party**

Where the processing of Personal Data about you is necessary for the purpose of the legitimate interests pursued by the Company or by a third party, you have the right to object to such processing for this purpose by sending a notice to the following email address [support@affilistars.com](mailto:support@affilistars.com), unless We demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

## **8. Transfer Of Personal Data To Third Parties**

The Company shares Personal Data with companies within the group of companies of which the Company is a part, for the purpose of supporting the activities of the Company and Our affiliate program.

The Company may also share Personal Data about you with third parties that provide Us with the following services:

- a. KYC and AML services.
- b. Payment services, such as payment service providers, payment processors and banks.
- c. Storage and hosting providers, including cloud computing services.
- d. Fraud prevention.
- e. IP address information.
- f. Dispatch of materials via various means of communications, such as emails, SMS, regular (snail) mail, push notifications and other electronic messages.

- g. CRM data management.
- h. Accounting and legal services.
- i. Research, analytical, technical and diagnostic services.

The Company may share Personal Data about you with governmental, local, official and regulatory authorities, as well as where such disclosure is required to protect Our and third parties' interests, rights and assets, including initiation or exercise or defense of legal claims.

In addition, We may disclose Personal Data about you to potential purchasers or investors of, or lenders to, the Company and/or any company within the group of companies of which the Company is a part, or in the event of any similar transaction (including the sale of assets of the Company and/or of any company within the group of companies of which the Company is a part), and/or in connection with any merger, reorganization, consolidation or bankruptcy of the Company and/or any company within the group of companies of which the Company is a part.

## **9. Your Rights in respect of The Personal Data About you**

You are entitled to the following rights in respect of the Personal Data about you. The exercise of such rights will be via sending an email requesting to exercise your right to the following email address: [support@affilistars.com](mailto:support@affilistars.com)

### **Right of access**

You have the right to receive from the Company confirmation as to whether or not Personal Data about you is being processed, and, where that is the case, access to the Personal Data and the following information: (1) the purposes of the processing; (2) the categories of Personal Data concerned; (3) the recipients or categories of recipient to whom the Personal Data have been or will be disclosed, in particular recipients in third countries outside the European Economic Area (EEA) or international organizations; (4) where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period; (5) the existence of the right to request from the Company rectification or erasure of Personal Data or restriction of processing of Personal Data about you or to object to such processing; (6) the right to lodge a complaint with a supervisory authority; (7) where the Personal Data is not collected from you, any available information as to its source; (8) the existence of profiling; and (9) where personal data is transferred to a third country outside the EEA or to an international organization, the appropriate safeguards relating to the transfer.

The Company shall provide a copy of the Personal Data undergoing processing and may charge a reasonable fee for any further copies requested by you. Where you make the request by electronic means, and unless otherwise requested by you, the information shall be provided in a commonly used electronic form.

The right to obtain a copy of the Personal Data shall not adversely affect the rights and freedoms of others, and therefore if the request will harm the rights and freedoms of others, the Company may not fulfill your request or do so in a limited manner.

### **Right to rectification**

You have the right to obtain from the Company the rectification of inaccurate Personal Data about you. Taking into account the purposes of the processing, you have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

### **Right to erasure**

You have the right to obtain from the Company the erasure of Personal Data about you where one of the following grounds applies: (a) the Personal Data is no longer necessary in relation to the purpose for which it was collected or otherwise processed; (b) you object at any time, on grounds relating to your particular situation, to processing of Personal Data about you which is based on the legitimate interests pursued by Us or by a third party, and there are no overriding legitimate grounds for the processing; (c) the Personal Data has been unlawfully processed; (d) the Personal Data about you has to be erased for compliance with a legal obligation in European Union or Member State law to which the Company is subject.

This right is not applicable to the extent that the processing is necessary: (a) for compliance with a legal obligation which requires processing by European Union or Member State law to which the Company is subject; or (b) for the establishment, exercise or defense of legal claims.

### **Right of restriction of processing**

You have the right to obtain from the Company restriction of processing of Personal Data about you where one of the following applies: (a) the accuracy of the Personal Data is contested by you, for a period enabling the Company to verify the accuracy of the Personal Data about you; (b) the processing is unlawful and you oppose the erasure of the Personal Data about you and request the restriction of its use instead; (c) the Company no longer needs the Personal Data about you for the purposes of the processing, but it is required by you for the establishment, exercise or defense of legal claims; (d) where the processing of Personal Data about you is necessary for the purpose of the legitimate interests pursued by the Company or by a third party, unless We demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

Where processing of Personal Data about you has been restricted following your request, such Personal Data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another

natural or legal person or for reasons of important public interest of the European Union or of a Member State.

### **Right to data portability**

You have the right to receive the Personal Data about you, which you have provided to the Company, in a structured, commonly used and machine-readable format and have the right to transmit such Personal Data to another controller, where: (a) the processing is based on a contract to which you are a party; and (b) the processing is carried out by automated means.

In exercising your right to data portability, you have the right to have the Personal Data about you transmitted directly from the Company to another controller, where technically feasible. The exercise of your right to data portability is without prejudice to your and the Company's rights under your right to erasure. In addition, the right to data portability shall not adversely affect the rights and freedoms of others.

### **Right to object**

You have the right to object, on grounds relating to your particular situation, at any time to processing of Personal Data about you which is based on the legitimate interests pursued by the Company or by a third party, including profiling based on such legitimate interests. We shall no longer process the Personal Data about you unless We demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

### **Right to withdraw consent**

You may withdraw your consent provided to Us for the purpose of processing Personal Data about you at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

### **Right to lodge a complaint with a supervisory authority**

You have the right to lodge a complaint with a supervisory authority which is established by a Member State in order to protect the fundamental rights and freedoms of natural persons in relation to processing of personal data within the European Union.

Your rights in respect of Personal Data about you as outlined in this section 9 may be restricted by European Union or Member State law to which the Company is subject to.

We shall provide you with the information requested according to your rights outlined in this section 9 without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. We shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay.

The information requested according to your rights outlined in this section 9 shall be provided free of charge, unless stated otherwise in this section 9. Where requests are manifestly unfounded or excessive, in particular because of their repetitive character, We may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or (b) refuse to act on the request.

The Company may require you to provide additional information necessary to confirm your identity in order to fulfill your request according to your rights outlined in this section 9, where We have reasonable doubts concerning the identity of the natural person making the request.

## **10. Cookies**

### **General**

When you visit or access the Website a cookie file (which is a small text file) is installed on the device via which you visit or access the Website. The cookies allow Us to collect information about you and your behavior, in order to improve your user experience, to remember your preferences and setting. Cookies are also used collect statistics and perform analytics.

Some of the cookies We use are session cookies, which are downloaded temporarily to your device and last until you close your web browser, while others are persistent cookies which last on your device after you cease browsing the Website and are used to help the Website remember you as a returning visitor when you return to the Website.

### **Types of cookies**

The cookies We use have classified according to their functionality, as follows:

<b>Type of cookie</b>	<b>Purpose</b>	<b>Additional Information</b>
Strictly Necessary Cookies	These cookies are strictly necessary to enable you to navigate the Website and use features you have requested. They are used to provide you with Our content, products and services that you have requested.	These cookies collect Personal Data about you, such as user name, last login date and identify you as being logged in to the Website.

	Such cookies are essential to help your device download or stream information so that you can navigate around the Website, use its features and allow you to return to pages you have previously visited.	These cookies are deleted when you close your web browser (session cookies)
Functionality Cookies	These cookies are used to recognize you when you return to the Website and allow Us to remember your choices and preferences.	These cookies survive the closing of your web browser, and last until their applicable expiry time.
Performance Cookies	These cookies are used to provide aggregated statistics in respect of the performance of the Website and to test and improve such performance, in order to provide better user experience; in addition, they allow Us to carry out analytical functions on the Website.	These cookies collect anonymized data which is not relating to an identified or identifiable natural person.  These cookies are valid for varying periods; some are deleted once you close your browser, while others have an indefinite validity period.
Third Party Marketing / Targeting Cookies	These cookies are used to measure the effectiveness of an advertising campaign. These cookies record your visit to the Website and the pages you have visited.	Some of these cookies are provided and used by third parties.  These cookies are valid for varying periods; some are deleted once you close your browser, while others have an indefinite validity period.

### **Blocking and removal of cookies**

You can change your browser settings in order to block and delete some or all cookies. Please see below links to instructions as to how to do this in respect of some of the most popular web browsers:

- [Firefox](#)
- [Internet Explorer](#)
- [Google Chrome](#)
- [Safari](#)

Please note, however, that if you do so, some or all of the Website's features and functionalities might not perform as intended.

## **11. Retention Of Personal Data About You**

The Company shall retain Personal Data about you for as long as is required to fulfill the purposes of the processing of the Personal Data as outlined in this Policy, or for a longer period as required according to the legislation, regulation, policies and orders that apply to Us.

In general, We will hold Personal Data about you for a minimum period of five years after the termination of your account with Us.

In order to ensure that Personal Data about you is not retained for longer than is required, We periodically review Personal Data retained by Us in order to examine whether any Personal Data can be erased.

## **12. Transfers Of Personal Data To A Third Country Or An International Organization**

Personal Data about you may be transferred to a third country (i.e., jurisdictions outside the EEA) or to international organizations. In such circumstances, the Company shall take appropriate safeguards aimed to ensure the protection of Personal Data about you and provide that enforceable data subject rights and effective legal remedies for data subjects are available.

These safeguards and protection will be available if any of the following are met:

- a. The transfer is to a third country or an international organization which the EU Commission decided that they provide an adequate level of protection to the Personal Data that is transferred to them pursuant to Article 45(3) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 ("**GDPR**"); including any transfer in accordance with the EU-US Privacy Shield Framework;
- b. The transfer is according to legally binding and enforceable instrument between public authorities or bodies pursuant to Article 46(2)(a) of the GDPR; or
- c. The transfer is in accordance with standard data protection clauses adopted by the EU Commission pursuant to Article 46(2)(c) of the GDPR; the clauses adopted by the EU Commission can be viewed at [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)

You may request the Company to be provided with details concerning the safeguards employed by it to protect the Personal Data about you which is transferred to a third country or an international organization, by sending an email to the following address: [support@affilistars.com](mailto:support@affilistars.com)

## **13. Protection Of Personal Data About You**

We implement appropriate technical and organizational measures to ensure an appropriate level of security to Personal Data taking into account the risks that are presented by processing, in

particular from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data transmitted, stored or otherwise processed.

We may be required, due to legal or other obligations outside Our control, to transfer Personal Data about you to third parties, such as public authorities. In such circumstances, We have limited control over the level of protection provided to the Personal Data about you by such third parties.

Any transfer of Personal Data via the internet cannot be fully secured. Therefore, the Company cannot ensure the protection of Personal Data about you when transferred via the internet to the Website and Application.

#### **14. Links To Websites of Third Parties**

The Website may provide links to websites and/or applications of third parties. The Company does not control such websites and applications, nor the collection and/or processing of Personal Data about you by such websites and applications, and We are not responsible for such websites and applications, nor to their privacy and data protection policies and activities. This Policy does not apply to any actions taken via such websites and/or applications.

Wherever you access such third parties' websites and/or applications, We recommend that you carefully review their privacy policies prior to using such websites and/or applications and prior to disclosing any Personal Data by you.

#### **15. Changes To This Policy**

We may amend, from time to time, the terms of this Policy. Whenever We amend this Policy, We will notify such amendments by publishing the updated Policy on the Website. In addition, when We make significant amendments of this Policy, We will strive to inform you about such amendments via means of communication which We believe are reasonably appropriate to inform you of such amendments and by publishing a notice about such amendments on the Website. Unless stated otherwise, all amendments will enter into force upon publishing the updated Policy on the Website.