

Privacy Policy

Privacy and the protection of your personal data are very important for EXEEDME which has always processed the collection, use, consulting and treatment of the data in strict compliance with the applicable legislation regarding personal data protection.

With the application of EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016, also called the General Data Protection Regulation, EXEEDME is committed to providing its customers with detailed information about the use and protection of their personal data, the reasons why it is processed and their rights regarding this processing, in compliance with the provisions in articles 13 and 14 of the GDPR.

1. Data Controller

- 1.1. EXEEDME OÜ, with head offices at Harju maakond, Tallinn, Kristiine linnaosa, Keemia tn 4, 10616, owner of the EXEEDME brand, is the entity responsible for processing the personal data of EXEEDME users.
- 1.2. EXEEDME users can contact the data controller through the following addresses to raise any questions or get clarification regarding personal data protection:
 - By email to support@exeedme.com
 - By mail to: Harju maakond, Tallinn, Kristiine linnaosa, Keemia tn 4, 10616, Estonia

2. Personal data category

- 2.1. The personal data collected and handled by EXEEDME is limited to what EXEEDME users voluntarily, expressly and unequivocally provide, by completing any form contained on this website.
- 2.2. EXEEDME processes the various categories of personal data depending on the reason for its processing, having classified it in the following way:
 - Identification data (e.g. name, signature, nationality);
 - Address and contact data (e.g. tax address, postal address, telephone numbers);

3. Purposes of processing the data and legal grounds

- 3.1. EXEEDME users personal data is processed in pursuit of specific, explicit and legitimate purposes and cannot later be processed in a way that is incompatible with these purposes.
- 3.2. In order to ensure a minimum and limited collection of data, EXEEDME only handles data that is strictly necessary, adequate and important for the purposes for which it is handled.
- 3.3. Our customers' personal data can only be processed for the following purposes:
 - To manage your registration on the EXEEDME platform, i.e. if you want to register as a user on this platform, we need to handle your data to identify you as a user and grant you access to various functions, products and EXEEDME services, as if we did not process the data this would not be possible.

- Compliance and enforcement of applicable Anti-money laundering\Counter terrorism financing (AML\CTF) legislation, regulators requests, sanctions and PEP screenings, fraud suspicious investigations (including anti-cheat logs), purchases, and general platform usage, which occurs for instance when you use EXEEDME tokens.
- Marketing and communication of products and services. EXEEDME handles your data to send you the Newsletter and EXEEDME promotional campaigns by email and/or Short Message Service (SMS), and to invite you to EXEEDME events or tournaments. This data processing occurs in pursuit of the data controller's legitimate interests and/or when a customer has given their free, informed and explicit consent for this purpose.
- Customer support. EXEEDME considers its legitimacy to process EXEEDME customers' data to answer requests and/or questions raised regarding EXEEDME products and services.

4. Personal data recipients

4.1. For the purposes mentioned above and in compliance with its legal obligations, EXEEDME may have to send the user's personal data to third parties, namely:

- To entities that are subcontractors pursuant to the General Data Protection Regulation, to provide the contract enforcement services, information technologies, data storage, auditing, document management and litigation, namely with service providers in the security services, AML\CTF, accounting, information systems, auditing and litigation areas. EXEEDME shall only use subcontracted entities who act according to its instructions and as long as they present sufficient guarantees they can undertake the proper technical and organizational measures, so that the processing satisfies, among other things, the security, confidentiality and integrity requirements and these guarantees are formalized in an agreement signed by EXEEDME and the entities.
- Entities that are considered to be third parties for the purpose of the General Data Protection Regulation such as the Tax and Customs Authority, Judicial Entities and Regulators.

5. Storage period

- 5.1. Your personal data will be processed as long as it is necessary, or while mandatory to comply with the purposes mentioned above.
- 5.2. The data needed to manage the registration as a user on the platform will be kept until the customer decides to cancel their registration.
- 5.3. The data processed under the scope of the compliance and enforcement of applicable legislations, fraud investigations and general platform usage (including tokens

transactions) will be stored for the time period strictly necessary to manage the proper platform functioning, including any transactions, or complaints regarding the services in question.

- 5.4. The data processed for the client identification and checks against AML\CTF lists will be kept for the legally required period of time to pursue this purpose.
- 5.5. The processing of data collected for marketing and communication of products and services will be kept for 1 (one) year as of the users last interaction or until they withdraw the consent that they gave for the purpose, depending on the case.
- 5.6. The data processed under the scope of customer support will be kept for the time needed to respond to the inquiries or requests.

6. Data Subject' Rights

6.1. EXEEDME customers, as the data subjects, through the collection and processing of their data, have the following rights:

- **the right of access:** whenever they request, they can access their personal data, get information about the processing of their data and get a copy of their personal data that is handled;
- **the right of rectification:** whenever they consider that their personal data is incomplete or inaccurate, they can request its rectification\modification;
- **right of data erasure:** notwithstanding any legal obligations that may limit this right, the data subjects can request their data elimination when: the data no longer needs to be processed for the purpose that justified its collection or processing; the user withdraws its consent on which the data processing was grounded and there are no other legal grounds for it; they present opposition to the processing of the data and there are no prevailing legal interests, to be assessed on a case by case basis, that justify the processing; when the data has been processed illegally; the personal data has to be deleted to comply with a legal obligation that the data controller is subject to; the data has been collected in the context of the offer of services by the company mentioned in article 8(1) of the General Data Protection Regulation;
- **right of limiting the processing:** the data subject can request to limit the processing of their data in the following situations: if the user challenges the accuracy of the data, during a period that allows the controller to check its accuracy; if the processing is illegal and the data subject opposes to their personal data being deleted and requests that its use be limited; if the data processor no longer needs the data to be processed but the data is still necessary for the purposes of declaration, exercise or defense of a right in a legal process; if the user opposes to the processing, until it is seen that the legitimate interests of the data processor prevails over theirs.

- **the right of objection:** the data subject has the right to oppose to the processing of their data when the processing is based on the legitimate interest of the controller or when the data is processed for other reasons than those for which it was collected, but that is compatible with it.
- If you oppose to the processing of the data, EXEEDME shall stop processing your data unless it has legitimate reasons to conduct this processing and these prevail over your interests. You can also oppose the processing of your data at any time for direct marketing purposes.
- **right to portability:** if your personal data is in a structured format that is in current use and of automatic reading, the processing is based on the express consent or by contractual form and if it is done by automatic means, you have the right to send them to another controller as long as if that is technically possible.
- **right to withdraw your consent:** in situations where the processing in question is undertaken based on your consent, you have the right to withdraw the consent you gave at any time. In this case, the controller will stop processing the data in question, unless there are other grounds that justify the processing.
- **the right to lodge a complaint with the supervisory authority:** you have the right to lodge a complaint with the Republic of Estonia Data Protection Inspectorate regarding the matters concerning the processing of your personal data.

7. Optional Information

7.1. If you wish, following registration you may add the following information to your EXEEDME profile, by using your EXEEDME account settings and provided that you gave the free, informed and explicit consent to EXEEDME for this purpose:

- Full address;
- Time zone;
- Phone number;
- Avatar picture;
- Twitch account;
- Instagram account;
- Facebook profile;
- Twitter profile;
- YouTube profile;
- Discord profile;
- Google profile;
- Tick Tock profile.

7.2. You are also able to connect your EXEEDME account to third party platforms Steam, Wargaming, XBOX, PSN, Battle.net and HiRez, in which case we collect the following information in respect of each third party platform (always provided that you gave the free, informed and explicit consent to EXEEDME):

- Username/nickname
 - User ID
 - An access token, to allow us to connect to your third party account and to ensure we are connecting to the correct third party account; and
 - A refresh token, which allows us to request additional access tokens, and therefore re-connect to third party accounts, until the refresh token is withdrawn (if, for example, you decide to disconnect your account from the third party platform).
- 7.3. If you choose to link a game to your EXEEDME account and give EXEEDME the consent previously referred, we will collect the following information in respect of each game:
- Nickname;
 - ID;
 - Rank/Skill Level, which is based on your previous performance in games;
 - Basic profile statistics;
 - Bans information; and
 - List of Friends (Steam only).

8. Information provided when using the online services

- 8.1. We will collect the following information from you when playing a game using one of our Clients:
- Match statistics;
 - Match results;
 - Match replays;
 - Event logs, which relate to your in-game behavior; and
 - Chat logs from the game, if you are playing CSGO.
- 8.2. If you have installed anti-cheat software, we will also collect Anti-Cheat Logs. This privacy policy should be read in conjunction with any other terms or notices applied to anti-cheat software.
- 8.3. When you sign up, we record the web page from which you have accessed EXEEDME.

9. Information provided when using the forums

- 9.1. In order to set up an account to use the Forums, we will collect the following information:
- username;
 - email address;
 - password;
 - unique User ID which identifies your account.
- 9.2. Alternatively, you may choose to login with your EXEEDME website account.

10. Use of Cookies

- 10.1. We collect cookies when you visit our site. A cookie is a small text file that is placed on your hard drive by a web page to improve performance and the user's browsing experience, increasing the speed and efficiency of replies while eliminating the need to enter the same information several times.
- 10.2. There are two kinds of cookies:
 - permanent cookies - which are saved in the browser used on your equipment (e.g. PC, mobile and tablet) and that are used whenever you return to any of our sites. They are normally used to direct the browser according to the user's interests, allowing us to provide a more personal service.
 - session cookies - these are temporary cookies that stay in your browser's cookie folder until you leave the website. The information these cookies collect is used to analyze web traffic patterns, enabling us to identify problems and provide a better browser experience
- 10.3. The cookies are used for the following purposes:
 - **strictly necessary cookies** - Allow you to browse the website and use the applications as well as letting you access secure areas on the website. Without these cookies, the services you request cannot be provided.
 - **analytical cookies** - These are used anonymously to create and analyze statistics to improve the website's operation.
 - **functional cookies** - Save the user's preferences regarding its use of the site so they do not need to be configured every time you visit it.
 - **third-party cookies** - These measure the success of the applications and the effectiveness of third-party publicity. They can also be used to customize a widget with the user's details.
 - **Ads cookies** - provide direct advertising, depending on each user's interests so as to give ads campaigns taking into account the user's preferences and they also limit the number of times an advert is seen, helping to measure the effectiveness of publicity and the success of the website organization.
- 10.4. Depending on how you manage the cookies on our site and your interaction with us, we use some of the information that is collected by the cookies to make sure the site works properly, highlighting the proper views of the contents, remembering your registration, adjusting the screen resolution to improve our offers among other things. This information includes registration details, location, session duration, the services you selected, your equipment, your browser and your IP address.
- 10.5. When you browse our site and then later visit platforms where there is publicity format (social networks, Google and other partners of these networks) you may be shown adverts about our brand. We also use the data to reach new potential customers who may be interested in our products.
- 10.6. Cookies do not harm your processor and do not contain viruses. You can deactivate the use of cookies at any time in the configuration of your browser or directly on our site.

However, if you deactivate certain cookies this may stop some web services from working properly, partially or completely affecting the browsing on the website.