4 SECURITY AND PRIVACY POLICY

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| **TEXT ENGLISH** |
| **Security & Privacy policy**  **Last Revised: 9 October 2024**  **Introduction**  [www.numbersroulette.com](http://www.numbersroulette.com/) is a duly authorized branded site and the **NUMBERS ROULETTE** application is a duly authorized branded of the “BIDSET SOFTWARE” (Tax Registration Number (CUI) 50540287) LIMITED COMPANY, (referred to as "WWW.NUMBERSROULETTE.COM", "NUMBERS ROULETTE", “BIDSET SOFTWARE”, "we", "our" or "us" as the context requires). We are incorporated in Romania and duly licensed to provide our services in and from Romania in conjunction with and/or as well as other companies under the same ownership also involved in providing similar or complementary services, (collectively referred to as "the Group") and fully respecting the law of the Romania.  We have provided this privacy policy to help you understand how we collect, use and safeguard your information for the purpose of operating our site and delivering our services. You should read this notice in conjunction with our [Terms and Conditions](https://cdn.prod.website-files.com/677ab2cb3e354eaf7171ed00/679a117d29a2a577ccff78c8_2%20TERMS%20AND%20CONDITIONS.docx) for use of this site and this application or any other sites or applications made and/or operated by us.  **Personal information**  We collect personal information when you use our services and buy our products, make customer enquiries, register for information or other services, or when you respond to us. Selected third parties, to whom you have chosen to disclose your personal information, may also provide us with your personal information. The types of personal information we may collect could include, for example, your name and e-mail address, home address, telephone number, debit/credit card data and lifestyle and other information collected on registration or through online surveys or questionnaires.  **Website Privacy Policy**  For purposes of statistical analysis and displaying localized information, the [www.numbersroulette.com](http://www.numbersroulette.com/) website and the downloaded NUMBERS ROULETTE application software automatically logs all Internet IP addresses which access our site.  **Email Privacy Policy**  When signing up and registering an account with [www.numbersroulette.com](http://www.numbersroulette.com/), or download the NUMBERS ROULETTE application software, you will be requested to provide a valid personal email address. We use this email address to send to you the paid by you product as NUMBERS ROULETTE algorithmic method to play roulette, notify you of important updates to your account, as well as to share our latest commercial offers and prices.  If you prefer not to receive promotional emails, simply notify us of your wish to unsubscribe at any time by:   * Sending a blank email to [support@numbersroulette.com](mailto:support@numbersroulette.com)and including the word «REMOVE» in the subject line.   On receiving your notice, we will immediately cancel this service. If you continue to receive our promotional emails and updates or any other unsolicited promotional communication after asking to be unsubscribed, please report to us at [support@numbersroulette.com](mailto:support@numbersroulette.com).  **How your information is processed**  If you choose to provide us with personal information, your personal information will be processed to allow us to provide you with our services; provide you with our products; process any of your requests for information; provide customer support services; enable the payments via payment settlement service providers; market our services or products or those of the Group; improve the content of our website; notify you about updates to our website, software and/or services and/or products; and support any of the intended purposes stated at the time at which your information was collected, in accordance with your preferences.  **Use of Personal Information**  The personal information that we ask you to provide when creating your [www.numbersroulette.com](http://www.numbersroulette.com/) User account or download the NUMBERS ROULETTE application software is used for the following purposes:   * (a) creating and managing user accounts and records * (b) administering user accounts * (c) sales of our products, providing and personalizing our services * (d) dealing with your enquiries and requests * (e) notifying you of updates to our products and/or services * (f) ensuring we are able to fulfill our regulatory responsibilities by verifying the accuracy of any information you provide us; * (g) our general regulatory compliance, crime prevention and prosecution of offenders including, where appropriate, dealing with requests for information by authorized entities for the sharing of information * (h) carrying out market research campaigns * (i) providing you with information about and support for products and services * (j) marketing our services or products or those of other entities within our group of companies; and * (k) supporting any of the intended purposes specifically stated at the time at which you provided the personal information   These are the “Purposes” for which we may collect personal data.  **To whom your information is disclosed ("recipients")**  Our information may be disclosed for processing to any other companies within the Group and their employees; any third party service providers who use your personal information to provide services to us - such as: payment settlement service providers, marketing service providers (including affiliates), data verifiers and financial institutions, to the extent necessary for the completion of payments, joint marketing campaigns, facilitate the opening of new accounts, and fraud prevention for services provided through our website; or any auditors or contractors or other advisers auditing any of the Group's business processes, potential purchasers or investors in any company within the Group. Any processing performed by any recipients will be governed by the necessary data processing agreement in the form and substance required by applicable law, thereby preserving your rights under applicable data protection laws.  We ensure that your information will not be disclosed to government institutions or authorities unless:   * we have your written consent to share such personally identifiable information with third parties * we require your personally identifiable information to provide the services and/or to provide the sales of the products that you have requested (if any) * we respond to subpoenas, court orders or legal process * we find that your actions on our web sites violate our terms of service, or any of our usage guidelines for specific services   In addition, we reserve the right to disclose and transfer your personal data to our respective payment settlement service providers and financial institutions to the extent necessary for the completion of payments for services provided through our website.  We may also permit selected third parties to use such data, to provide you with information about related services which may be of interest to you and we or they may contact you about these.  **Security**  Keeping your data safe is our paramount concern.  Internal access to all data is limited and strictly monitored. We have implemented suitable security policies, rules and technical measures to protect and safeguard the personal data under our control from unauthorized access, improper use or disclosure, unauthorized modification, unlawful destruction or accidental loss.  All our employees and data processors or handlers who have access to, and are associated with the processing of your personal information, are obliged to respect the confidential nature of your information pursuant to applicable data protection and privacy laws.  **Cookies**  We may send you a permanent cookie when you register with us or download the application. A cookie is a small file that can be placed on your computer's hard disk for record-keeping purposes. Cookies can help us to recognize you when you next visit our website, note the advertisements you click on and the other sites you enter via a link from our website. This allows us to tailor the service we provide to your preferences. We may also use the data generated from cookies to compile statistical data on your use of our website. You are not obliged to accept a cookie from us or from any other website. You can modify your browser so that it will not accept cookies. Please consult the "Help" section of your browser for instructions on how to do so correctly. However, for legitimate security reasons, we may refuse access to specific website content unless you accept the use of a cookie or similar device.  **Protection of Minors**  The services provided on this website are not intended for or directed to minors or persons under the age of legal consent. Any person who provides their information to us represents to us that they are 21 years of age or over the age of legal consent in their jurisdiction. We reserve the right to access and verify any personal information submitted by or collected from you. If we become aware that a minor has attempted to or has submitted personal information via this website, we may not accept this information and we may take steps to remove such information from our records.  **Transfer outside Romania**  It may be necessary to transfer your personal information to other companies within the Group located in countries outside Romania. This may happen if any of our servers or members of the Group are located or based outside the Romania, if you use our services and products while visiting countries outside the Romania or if we transfer your personal information to such companies for purposes regarding which you will receive advance notice. The data protection, privacy and other laws of these countries may not be as comprehensive and in these instances we will take steps to ensure that a similar level of protection is given to your information. We reserve the right to amend or modify this Privacy Policy at any time and in response to changes in applicable data protection and privacy legislation applicable to the Group. By submitting your personally identifiable information to us you consent to the use of that information as set out in this Privacy Policy.  If we change our Privacy Policy we will post the changes on this page, and may place notices on other pages of the website, so that you may be aware of the information we collect and how we use it at all times. Continued use of the service will signify that you agree to any such changes made so please check this page regularly.  **Contact us**  You may request details of your personal information kept by us by following the contact information set out below. Once we receive such a request we will ask you to verify your identity by providing relevant information or documentation. We will then request pre-payment of an administration fee of US$50 per request and upon receipt of this process your request within 30 days.  If you have any enquiry about our data protection and privacy policy or practices, or wish to decline receiving e-mail offers from us or from any other companies within the Group please contact [www.numbersroulette.com](http://www.numbersroulette.com/) Customer Service by email to [support@numbersroulette.com](mailto:support@numbersroulette.com) or write to “BIDSET SOFTWARE” Company Limited, **Postal address** 060023, România, Bucharest, Sector 6, 202B, Splaiul Independentei street, office 42 |