Privacy statement

Our data privacy statement, sets out how "We/Us" (Melita Limited) handle personal data which is given by "You" (Affiliate) in relation the online affiliates platform. We are aware of the importance to Our affiliates of how their personal data is handled and We assure You that We observe all relevant legal requirements. We consider the protection of Your privacy to be of paramount importance. For this reason, compliance with the legal requirements on data privacy for Us matters.

Contacting Our Data Protection Officer

Melita Ltd Gasan Centre, Mriehel Bypass, Mriehel, BKR 3000, Malta dpo[at]melitaltd.com

Personal Data

Personal data refers to any information about personal or factual circumstances of an identified or identifiable person.

We collect and process the following personal information about you:

- Contact and address information, if You have provided Us with Your contact information or registered on Our site;
- Financial details in order to be able to issue commission payments;
- Online identifiers (such as Your IP address, browser type and browser version, the operating system You are using, the referrer URL, the IP address, the file name, the access status, the amount of data transferred, the date and time of the server request) in order to improve our offerings and platform.

Your data will not be shared with third parties.

Legal basis

Your data is handled according to the following legal provisions:

- With regard to data communicated in forms and any other correspondence exchanged between You and us with Your consent;
- Financial details and online identifiers are processed on the basis of the contract in order to pay You for commission claims;
- Information related to an order which is necessary for the compliance with a legal obligation;
- Otherwise, with particular regard to statistical data and online identifiers based on legitimate interests;

Legitimate interests

When handling Your data, We pursue the following legitimate interests:

- Statistics
- Protecting against misuse
- Improving Our offerings and platform

Your Rights

You have a right to object to Our processing of Your personal data, access the personal data We hold about You and to request that We port such Personal Data in a structured, commonly used and machine-readable format to You or to another controller indicated by You. You also have a right to request that We immediately rectify, block or erase Your Personal data. Blocking and erasure of personal data provided for the purposes of the agreement may only be effected by Us in accordance with the terms of the applicable agreement and any other obligations incumbent on Us.

For processing activities based on Your consent, You can withdraw Your consent to the processing, and use of Your data completely or partially at any time with future application.

Data sources

Unless otherwise specified, We obtain the data from You (including via devices used by you).

Retention period

We retain Your data:

- if You have consented to this as part of processing, until such time as You withdraw Your consent,
- if We need the data to undertake an agreement, until such time as the contractual relationship with You ceases or legal retention periods expire,
- if We use the data on the basis of a legitimate interest, until such time as Your overriding interest obliges Us to delete or anonymise them.

Purposes of use

Personal data will only be collected by Us to the extent and for the purpose for which You provide the data to us, e.g. for registration and the execution of the affiliate programme.

We use and store Your personal data for the following purposes only if You have provided Us with Your express consent:

- To send You newsletters; and
- To send You messages by e-mail.

Your consent may be modified by going on here Account > My data > Address & Contact in Your affiliate account at affiliates.melita.com. We use Your personal information only within the company and forward it only to those companies that are involved in performing the contracts concluded with You or otherwise involved in providing the relevant service. Otherwise, Your personal information will not be forwarded to third parties unless You have given Your express consent for this or unless We are obliged to disclose it, for example, at the direction of a court or administrative authority.

Data protection

We have taken extensive technical and organisational measures to secure Your data against potential risks, such as unauthorised login or access, unauthorised perusal, amendment or distribution, as well as against loss, deletion or misuse.

In order to protect Your personal data against unauthorised access by third parties when being transmitted, We secure data transmissions, if necessary, using SSL encryption. This is a standard encryption procedure for online services, particularly for the Internet.

Logfiles

Every time You access our Web pages, usage data are transferred through Your specific Web browser and stored in the form of protocol files (known as server log files). The datasets stored in this way contain the following data:

- The domain from which the user is accessing the Website;
- Date and time of access;
- IP address of the accessing computer;
- Website(s) which the user is visiting in the context of the offering;
- Amount of data transferred; browser type and version;
- Operating system used; name of internet service provider;
- Indication of whether access was successful;

These logfile datasets are analysed in anonymised form, to improve the offering and make it more user-friendly, to identify and resolve errors, and to control server workloads.

Third-party services

We use third-party services for various functions on our Website, however, Your data is not passed to a third party unless otherwise mentioned herein.

Contact possibilities

If You have any questions, comments, complaints or requests in connection with Our statement on data privacy and the processing of Your personal data, You may contact Our data protection officer on dpo[at]melitaltd.com.

Furthermore, you have a right to lodge a complaint with the Office of the Information and Data Protection Commissioner in Malta (<u>www.idpc.gov.mt</u>).

Requirement or obligation to provide data

Insofar as this is not expressly stated, when data is collected, the provision of data is neither required nor obligatory.

We reserve the right to make amendments at any time to this data privacy statement for future effect.

This notice is governed by the laws of Malta.

Date of issue of this data privacy statement: 13.06.2018