

When visiting the website spirit-digital.com, TSpirit Digital may receive information that you voluntarily provide when you fill out a “sign up” form and may collect certain ‘cookie’ information from your device. Such information may include personal information such as your name, email, telephone number when you fill out a “sign up” form.

Please note that you are not required to provide us personal information when you use. TSpirit Digital is not directed to users under 16 years of age and we do not intentionally or knowingly collect personal information on such users.

This Privacy Policy ("Privacy Policy") applies to all information and data TSpirit Digital could receive about users when such users visit the website spirit-digital.com (hereinafter "TSpirit Digital"), the websites of our partners, clients, advertisers. Privacy Policy provides information about our website and our platform which enables our partners to use our services and then describes our principles about data collection and use.

It also describes the type of data TSpirit Digital collects and utilizes when showing ads to users. TSpirit Digital provides its services strictly in accordance with the appropriate legislation regarding the collection and processing of data, the principles and rules of international legislation regarding the collection, processing, and protection of data.

1. GENERAL PROVISIONS

1.1. TSpirit Digital does not collect intentionally personally identifiable data such as names, email addresses, postal addresses or telephone numbers.

TSpirit Digital does not collect intentionally any information to identify user. The personal data such as name, email, telephone number, provided intentionally and voluntary by the user is used exclusively for the purpose of the cooperation of user and TSpirit Digital to get access to TSpirit Digital services.

1.2. TSpirt Digital collects personal information that allows to determine the uniqueness of user while maintaining his anonymity via cookies. Such personal information includes, but not limited:

- IP-address of user;
- Geographic location of user;
- Type of user's OS;
- The user's browser (for ex. Google Chrome or Safari);
- The language of user's browser;
- Data on visited sites by the user (site addresses);
- Data on the shows of ads to users and user's clicks on ads).

1.3. TSpirt Digital uses such personal information to provide its advertising services in order to determine the needs of users in one or another ads, to manage and develop the most effective advertising campaigns for its clients.

2. COOKIES

2.1. TSpirt Digital uses cookies to collect personal information. Such information collected through cookies are used to determine user preferences, to select and display targeted ads to the user but such data do not allow to identify user.

2.2. Cookie is a small text file stored on the user's hard drive while visiting TSpirt Digital.ru and/or viewing a clients' or partners' ads. Cookie is connected with a web browser and is unique for each browser.

2.3. User can disable or delete the use of cookies at any time via settings in his browser via activation opt-out function. However, disabling Cookies can lead to the non-operability and/or limited access to some parts of website spirit-digital.com and/or its partners' websites, and the user will be deprived of the opportunity, including receiving targeted ads from TSpirt Digital and its partners.

2.4. Customers, advertisers, partners of TSpirit Digital can use their own databases, which can contain personal data of users that were provided by users for the purposes of clients, advertisers, and partners. In such cases, advertisers, customers, and partners of TSpirit Digital are fully responsible for the user's consent to the processing of the information provided by them and to obtaining appropriate ads.

2.5. The user is entitled at any time to prohibit TSpirit Digital to collect personal information by cookies via activation "Opt-Out" function. To activate "Opt-out", please [click here](#).

The user is entitled at any time to require TSpirit Digital to delete any personal information regarding this user from TSpirit Digital data base by sending email to info@spirit-digital.com.

TSpirit Digital notes activation of "Opt-out" is applicable only to spirit-digital.com. The refusal does not apply to advertisers, partners of TSpirit Digital, who use their own cookies to collect statistical information.

3. PROVISION OF DATA TO THIRD PARTIES

3.1. TSpirit Digital provides access to user or customer's personal data (name, email, telephone number) in the following cases:

- the user has been given appropriate consent to provide such data;
- at the request of the public authorities in order to comply with the applicable legislation

3.2. TSpirit Digital has the right to transmit personal information (except for personal data incl. email, name, telephone number) to partners, customers only in order to show users relevant ads, analytical, marketing, researching purposes.

At any time user has the right to require TSpirit Digital to stop transmitting personal information to partners, customers in order to show users relevant

ads, analytical, marketing, researching purposes by sending email to sales@spirit-digital.com with appropriate request.

4. OTHER

4.1. This Privacy Policy applies only to spirit-digital.com. TSpirit Digital does not control and it's not liable for the sites of any third parties.

5. GDPR CLAUSE

In operating the website spirit-digital.com, TSpirit Digital processes data as a controller (as such terms are defined in the GDPR). As a controller, TSpirit Digital is committed to fulfill data subjects' (**'users'**) GDPR rights.

If you are EU resident, you may:

- access the data that TSpirit Digital keeps about you. TSpirit Digital may need to ask you to provide us certain credentials to make sure that you are who you claim you are. If you find that the data is not accurate, complete or updated, then you may provide us with the necessary information to rectify it.
- contact us if you want to withdraw your consent to the processing of your personal information. Exercising this right will not affect the lawfulness of processing based on consent before its withdrawal.
- request to delete or restrict access to your personal information. TSpirit Digital may postpone or deny your request if your personal information is in current use for providing the services or due to other legitimate purposes, such as compliance with regulatory requirements associated with TSpirit Digital.

If you exercise one (or more) of the above-mentioned rights, in accordance with the provisions of applicable law, you may request to be informed that third parties that hold your personal information, in accordance with this Privacy Policy, will act accordingly.

- you may ask to **transfer** your personal information in accordance with your right to data portability.
- you may object to the processing of your personal information for direct marketing purposes.
- you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affecting you.
- you have a right to lodge a complaint with a data protection supervisory authority.

If you have any concerns about the way TSpirit Digital process your personal information, you are welcome to contact to TSpirit Digital by email sales@tspiritdigital.com

TSpirit Digital will look into your enquiry and make required efforts to resolve your case.

TSpirit Digital is committed to assist its controllers as to data subjects' rights under the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR).

Please note that under the GDPR TSpirit Digital processes data provided into the services as a processor and not as a controller (i.e. Supply Partners). As a processor, TSpirit Digital is committed to assist its controllers to fulfill data subjects' GDPR rights.

Therefore, if you wish to exercise your rights under the GDPR or have any questions in this matter, please contact the relevant TSpirit Digital's controller directly. When needed and upon request, TSpirit Digital will assist its controllers.

TSpirit Digital conducts periodical assessments of its data processing and privacy practices to ensure that it complies with this Policy, update the Policy when necessary, and ensure that the policy is properly displayed and accessible.

6. FINAL PROVISIONS

TSpirit Digital reserves the right to change this Privacy Policy at any time. If TSpirit Digital decides to change Privacy policy, TSpirit Digital will post the updated version, together with an updated Effective Date, on this page.