

Privacy Policy

PREAMBLE

This Privacy Policy covers practices of OTSENE MEDIA OÜ (registered address: Harju maakond, Tallinn, Lasnamäe linnaosa, Pae tn 25-47, 11414, Estonia) (hereinafter – “Otsene”) regarding the collection, use, and share of personal information of you (hereinafter – “You,” “Your”) and applies to Your use of <https://www.otsenemedia.com/> (hereinafter – “Website”), the Website Materials, services offered through the Website (hereinafter – collectively with the Website, the “Services”).

This Privacy Policy is subject to modification at any moment, and any changes become effective immediately after they are posted.

Otsene encourages You to check back regularly for updates since it is solely Your duty to be informed of any changes that may have occurred.

In addition to publishing the modifications on this Website, Otsene does not offer any other means of notifying You of the changes.

By visiting this Website, You agree to Otsene’s collection and using Your personal information in the manner specified in this Privacy Policy.

If you do not agree to this Privacy Policy, please do not provide Otsene with any information or use the Website or Services.

LEGAL INFORMATION

This Privacy Policy has been prepared based on provisions of multiple legislations, including Regulation (EU) 2016/679 (GDPR).

THE PURPOSES OF COLLECTION AND USE

Your personal information may be asked to be provided and collected to enable Otsene to:

- provide its Services;
- protect its rights and interests;
- comply with its legal obligations;
- detect any malicious or fraudulent activity;
- for advertising purposes;
- respond to requests of state bodies.

PERSONAL INFORMATION

Personal information refers to any information about You as an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier.

When it is necessary Otsene may collect, use and share the following personal information of You:

- Identity information. Includes first and last names, maiden names, usernames or other similar identifiers, marital status, title, date of birth, and gender;
- Contact information. Includes email address and telephone numbers;
- Technical information. Includes Your internet protocol (IP) address, Your login data, Your browser type and version, Your time zone setting and location, browser plug-in kinds and versions, Your operating system and platform, and any other technologies on the devices You use to access the Website;
- This information also includes information on how You use Otsene's Services and browse across the Website, and it may not always include personally identifiable information about You. The information collected may include information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through, and out of the Website (including date and time), page response times, download errors, length of visits to specific pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to navigate away from the page, and other information;
- Marketing and communications information. Includes Your preferences for receiving marketing materials from Otsene as Your communication preferences with Otsene.

HOW OTSENE COLLECT, USE AND SHARE YOUR PERSONAL INFORMATION

Otsene may collect and use personal information about You as a result of Your usage of the Services.

Otsene may use this information in order to deliver correct Website Materials on the Website, to optimize the Website Materials, to ensure the long-term viability of Otsene's information technology systems and Website technology, and to provide law enforcement authorities with the information necessary for criminal prosecution in the event of a cyber-attack.

Otsene also collects, uses, and shares 'Aggregated Data,' which may include statistical or demographic information. However, if the data has been de-identified and anonymized, the aggregated information may be used to make decisions about You without revealing Your identity.

Otsene, for example, may combine Your use data in order to measure the proportion of users who have accessed a given Website feature or function. Whenever Otsene combines or connects Aggregated Data with Your personal information in such a way that the combined data can be used to directly or indirectly identify You, Otsene considers the combined data to be personal information, and the combined data will be used in accordance with the terms of this Privacy Policy.

The legal basis for this use is Otsene's legitimate business interests, which include monitoring and enhancing the Website as well as the correct protection of Otsene's company from hazards, as well as Your agreement, which you provided when consenting to allow cookies to be accepted.

In accordance with the time limits of such cookies and the way they are set to expire, personal information will be stored and then either deleted automatically after a period of time (normally no more than one year) or de-identified for statistical purposes, which will be kept indefinitely in the latter case.

Cookies are used in certain instances to collect some of the data listed above, and this data may contain information that cannot be used to identify you.

Otsene and other organizations may also access and use Your personal information to conduct 'know your client' ("KYC") checks, credit checks and checks to prevent fraud, money laundering, and terrorist financing ("AML/CFT").

Your contact data may be used for communication purposes, including but not limited to email messaging (system email, marketing email, etc.)

Otsene may use any of Your personal information required for the establishment, exercise, or defense of legal claims. This usage is justified on the basis of Otsene's legitimate interests, which include the protection and assertion of Otsene's legal rights, Your legal rights, and the legal rights of third parties.

Otsene collaborates with businesses that assist in running its business.

Occasionally, Otsene may need to share some of Your personal information with such partners in order for them to provide requested services.

They will have access to Your personal information solely to carry out the responsibilities assigned to them by Otsene.

Your personal information may be shared with service providers, affiliates, business partners, and other third parties that are involved in the process of Service provision.

ACCESS OF THIRD PARTIES

Your personal information may be shared with third parties in order to comply with legal duties imposed on Otsene as a result of its activity or as necessary to fulfill the Services for which those third parties were engaged.

Otsene may authorize the use of Your personal information to chosen third parties such as business partners, suppliers, service providers, agents, and contractors who are obligated to treat such information in accordance with the same precautions as Otsene does.

Additionally, Otsene may make use of third-party programs and software for the purposes of creating and maintaining mailing lists, collecting data through web-forms, and transmitting social media links.

Otsene is not responsible for the privacy practices or policies of such third-party service providers, and You are strongly advised to evaluate them to confirm that You consent to the gathering and use of Your personal information by third parties in the way indicated.

Additionally, Otsene may disclose or share Your personal information with a third party as part of any business restructuring or reorganization, or if Otsene is required to share Your personal information by law.

LINKS TO THIRD PARTY WEBSITES

This Website may contain links to websites controlled or offered by third parties. The links are only provided as a convenience and Otsene does not endorse or recommend any products or services offered by or information contained in any of these third-party sites. Otsene hereby disclaims all liability for all information, materials, products or services posted, offered or that may be accessed at any of the third-party websites linked to the Website. Otsene makes no representation regarding the quality of any product or service contained at any such third-party site. Furthermore, Otsene hereby disclaims all liability for any failure of products or services offered or advertised at those third-party websites.

RETAIN OF PERSONAL INFORMATION

You agree that Otsene will retain Your personal information for as long as required to accomplish the goal(s) for which it was obtained, as well as any other permitted related purpose.

Thus, if the information is utilized for two distinct purposes, Otsene will preserve it until the purpose with the longest retention time ends, but will discontinue using it for the purpose with the shortest retention term after that period expires.

Data retention duration of Otsene are determined by Otsene's business requirements, and any of your information that is no longer required is either

irreversibly anonymized (in which case the anonymized information may be stored) or safely deleted.

COOKIES

"Cookies" are little text files that uniquely identify You as a client and save both Your personal preferences and technical information.

Cookies are used to administer and track the performance of advertising that is shown on or provided by or via Website or other websites.

Cookies may be permanent (i.e., they stay on Your computer/mobile device until You erase them) or transient (they expire after a certain period of time) (i.e., they last only until You close your browser).

Otsene, its affiliates, third-party service providers, and business partners may send "cookies" to Your computer/mobile device or use similar technologies to improve Your online experience on Website.

Comparable to browser cookies, Adobe's Flash player and similar programs use this technology to remember user settings, preferences, and usage. While Flash cookies cannot be managed via Your web browser, you may utilize Adobe's Flash control tools.

Additionally, Otsene may use "Web beacons" to track Your usage of Website.

Web beacons are small pieces of code that enable the delivery of a graphic image on a web page for the purpose of transferring data, such as the IP (Internet Protocol) address of the computer that downloaded the page containing the Web beacon, the URL (Uniform Resource Locator) of the page containing the Web beacon, the time the page containing the Web beacon was viewed, the type of browser used to fetch the Web beacon, and the identification number.

When Otsene communicates with You through HTML-capable email, Web beacons may enable Otsene to determine if Your email was received and opened.

Cookies and Web beacons do not hold or expose personally identifiable information on their own. However, if You provide personally identifiable information, it may be connected to the data collected in Cookies/Web beacons.

By accepting this Privacy Policy, You expressly consent to Otsene's use of cookies and Web beacons.

YOUR RIGHTS

This Section applies if You reside in the countries of the European Economic Area and the United Kingdom.

You have certain rights under applicable legislation, and in particular under the GDPR. Otsene explains these below. You can find out more about the GDPR and your rights by accessing the European Commission's website https://ec.europa.eu/info/law/law-topic/data-protection_en.

Right to access.

You have the right to request confirmation from Otsene as to whether or not Your personal information is being processed, as well as a right of access to Your personal information in certain circumstances.

Right to rectification.

You have the right to have inaccuracies in Your personal information corrected and to have any gaps in Your personal information filled up.

It is critical that Otsene maintains correct and up-to-date personal information about You.

Kindly notify Otsene if Your personal information changes.

Right to erasure ('right to be forgotten').

You have the right to seek the deletion of Your personal information on a general basis and under the certain occasions.

Right to restrict processing

In addition to seeking deletion, You have the right to request that Your personal information be restricted from being processed under certain circumstances.

Right to object to processing.

Additionally, You also have the right to object the processing Your personal information under certain circumstances.

Right to data portability.

You have the right to request that Otsene provides You with the personal information You provided in a structured, frequently used, and machine-readable manner, or to request that Otsene provides it to another person.

CHANGES TO THIS PRIVACY POLICY

Otsene reserves the right to amend or otherwise modify this Privacy Policy at any time by publishing the updated Privacy Policy via the Website.

You are solely responsible for checking the Website for the changes to this Privacy Policy.

You agree that Your continuing use of or access to our Website or Services after the publication of any modifications to this Privacy Policy means Your agreement and acceptance to any changes and/or modifications of this Privacy Policy.

CONTACTS

All requests related to the use of this Privacy Policy, Website or Services must be sent via email info@otsenemedia.com.