

## OMNICOACH Privacy Policy

**OMNICOACH Ltd.** (“we”, “us” or “our”) is committed to protecting your privacy and want you to be familiar with how we collect, use and disclose data directly or indirectly relating to you as an individual (the "Personal Data").

This Privacy Policy describes how we process your Personal Data collected in relation to:

- the website <http://omnicoach.gg/> (the "Website"); and
- our services (the “Services”).

We are based, and we provide the Services from Hungary, a member of the European Union. Our processing of personal data is subject to the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation; the “GDPR”).

If you have questions or complaints regarding our Privacy Policy or associated practices, please contact us at [info@omnicoach.gg](mailto:info@omnicoach.gg).

### What Personal Data Do We Collect

Currently, you can only subscribe to OMNICOACH so we only collect your email address in order to send you interesting content, dev updates and of course the data when you can access the tool (it will be soon, so stay tuned :) ). When expressing an interest in obtaining information about our Services, we require you to provide us with your email address.

As you navigate the Website, we may also collect information through the use of information-gathering tools, such as cookies (the “Navigational Information”). The Navigational Information includes standard information from your browser, your Internet Protocol address and the actions you take on the Website (such as the web pages viewed and the links clicked). For additional information about the collection of the Navigational Information by US, please see the “Navigational Information” section of this Privacy Policy.

We also collect various types of your Personal Data which you may voluntarily provide us, for example through our phone, chat or email communication with you, when you contact our support, etc.

We act as the data controller of the Personal Data processed pursuant to this Privacy Policy.



## How We Use Your Personal Data

### Performance of Contract

We use the Personal Data of our subscribers for the purpose of performing the contract with their subscription, that is, to:

- manage newsletter subscriptions;
- send newsletters and emails to the received email addresses in order to inform subscribers about our development updates, providing OVERWATCH related coaching content as well as other content what we create or share and believe these are valuable to our subscribers, provide promotions and sales offers on an *ad hoc* basis.

We collect these data and store them in a database, also using 3rd party tools (such as mailchimp, drive etc.).

Please note that for testing purposes we might not send the same content to all of the subscribers. But this is done without any profiling.

### Legitimate Interest

We use the Personal Data to pursue our legitimate business interests, as described in detail below.

If you communicate with us in email, we store any information relating to the communication (what actually means the emails). Also, we may use your information for marketing purposes related to your use of, or interest in the Services. For example, we may use information you provide us to contact you to further discuss your interest in the Services and to send you information regarding our Services, such as information about promotions or events.

We use the Navigational Information to operate, improve or upgrade the Website or the Services and to provide you customized user experience. For additional information about the use of the Navigational Information, please see the “Navigational Information” section of this Privacy Policy.

For the purposes described above, we may combine together your Personal Data that are collected through the Website, Navigational Information, and your Personal Data obtained through our communication with you.

### Complying with Legal Obligations

We will process your Personal Data when so required by applicable laws, competent public or judicial authority or when necessary to protect our legitimate interests or to respond to lawful requests.



### **Use of email addresses**

We never sell or otherwise share your email address. We are highly concerned about the growth of spam email messages, and we know that you are as well. The purpose of our email messages is to be limited to information as outlined above.

Emails containing promotional content will be sent to you only in case you have explicitly consented thereto, by subscribing. Such consent may be withdrawn at any time.

### **Navigational Information**

We (and in some cases our partners) use cookies to help users log in to our Website, track users' movements around the Website, serve targeted advertisements, analyze trends and gather demographic information about our user base as a whole. This section describes the types of Navigational Information used on the Website, and how this information may be used.

### **Cookies**

We use cookies to make interactions with the Website easy and meaningful. Standing alone, cookies do not personally identify you; they merely recognize your web browser. Unless you have previously identified yourself to us, you remain anonymous to us.

We use session cookies and persistent cookies. Session cookies exist only during one session. They disappear from your computer or device when you close your browser software or turn off your computer. Persistent cookies remain on your computer or device after you close your browser or turn off your computer. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our Website.

We use the following type of cookies:

- **Essential Cookies:** these are automatically placed on your computer or device when you access our Website or take certain actions on our Website;
- **Functional cookies:** cookies that are designed for purposes such as enhancing our Website's functionality, such as remembering your language preferences; these are either not strictly essential for the Website or functionality which you have requested to work or are cookies which serve non-essential purposes in addition to their essential purpose.
- **Analytics and performance cookies:** these cookies track and gather data about what a user does on a website. These cookies are not essential for our website or its functionality to work.
- **Social Media Cookies:** these cookies enable you, if you wish, to login to your accounts on social media sites such as Google+, Twitter, Facebook and Pinterest and share content from our Website with your friends; these cookies also used in connection with "like" or sharing





functions. These cookies do not allow us access to your accounts or provide us with any confidential information relating to any of your accounts.

You can refuse cookies by changing your browser settings.

### **Log Files, IP Addresses, URLs and Other Data**

We gather certain information automatically to analyze trends in the aggregate and administer our Website. This information may include your IP address (or the proxy server you use to access the World Wide Web), device and application identification numbers, your location, your browser type, your Internet service provider and/or mobile carrier, the pages and files you viewed, your searches, your operating system and system configuration information, and date/time stamps associated with your usage.

Due to Internet communications standards, when you visit or use the Website, we automatically receive the URL of the website from which you came and the website to which you go when you leave our Website.

### **Children**

Protecting the privacy of young children is especially important. For that reason, we do not knowingly collect or solicit personal information from anyone under the age of 18.

However, children between the age of 12 to 18 can use our service. In this regard, we strictly follow the guideline of Blizzard Entertainment, INC regarding Overwatch. Where parental consent is required, you may use our services only if and to the extent that consent is given or authorized by the holder of parental responsibility (typically: the parent). We will presume that you hold such authorization or consent; we have no means to verify this. In case you are allowed to play with the game while also comply with other restrictions in connection with game enjoyment (for instance parental supervision), you can use our service as well.

### **How We Share Personal Data**

#### **Service Providers**

We may share your Personal Data with our contracted service providers so that these service providers can provide services on our behalf. These service providers are authorized to use your Personal Data only as necessary to provide the requested services to us. Examples of our service providers include third-party coders, developers, accountants, hosting providers, CRM solution providers.



### **Compelled Disclosure**

We reserve the right to use or disclose information provided if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process.

### **International Transfer of Personal Data**

To achieve the purposes described in this Privacy Policy, we may transfer your Personal Data to the following countries outside the European Economic Area:

- Canada, which is deemed to ensure an adequate level of protection under Article 45 of the GDPR;
- United States of America, in which case our data transfers are subject to the appropriate safeguards in accordance with the GDPR provided by EU-U.S. Privacy Shield for transfers to entities located in the United States. To learn more about the Privacy Shield Framework, please visit the U. S. Department of Commerce’s Privacy Shield website here: <https://www.privacyshield.gov>.

### **Retention Period**

In case you are unhappy with anything what we do, you can unsubscribe or send us an email to [info@omnicoach.gg](mailto:info@omnicoach.gg) and we will do our best to make you happy again.

Otherwise, we may retain your Personal Data for a period of time consistent with the original purpose of collection (for details please see the “How We Use Personal Data” section of this Privacy Policy). We determine the appropriate retention period for the Personal Data on the basis of the amount, nature, and sensitivity of your Personal Data, the potential risk of harm from unauthorized use or disclosure, and whether we can achieve the purposes of the processing through other means, as well as the applicable legal requirements (such as applicable statutes of limitation).

Email addresses recorded in connection with subscription to our newsletter are retained until you unsubscribe from our newsletter.

The system stores log information for 6 months calculated from the date of logging, except for the date of the last visit which is automatically overwritten by the system.

Cookies are retained until you decide to delete them. If you decide at any time that you no longer wish to accept cookies from our Services, then you can instruct your browser, by changing its settings, to stop accepting Cookies or to prompt you before accepting a Cookie from the websites you visit. Consult your browser’s technical information. If you do not accept cookies, however, you may not be able to use all portions of our Services or all functions of the Website. After expiry of the retention periods, your Personal Data will be deleted. If there is any information that we are unable,



for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further use of the data.

The above provisions do not affect the fulfillment of particular data retention obligations set forth by law (e.g. in accountancy laws), or data processing based on additional consents provided in the course of registration on the website, or in any other manner.

### **Your Personal Data Rights**

You have certain rights regarding your Personal Data, subject to local data protection laws. As regards our processing of your Personal Data which is subject to the GDPR, you have the right:

- to obtain from us the confirmation whether we process your Personal Data and to access your Personal Data, including the details of such processing, as specified in Article 15 of the GDPR, and to obtain a copy of your Personal Data;
- if inaccurate, to rectification and completion of your Personal Data in accordance with Article 16 of the GDPR;
- to demand that we erase your Personal Data (the right to be forgotten) on the grounds specified in Article 17 of the GDPR (including if the processing of your Personal Data is no longer necessary for the purposes stated in this Privacy Policy);
- to restrict our processing of your Personal Data on the grounds as set forth in Article 18 of the GDPR (for example, if you contest the accuracy of the Personal Data, the processing may be restricted until we verify the accuracy of the Personal Data);
- if our processing of your Personal Data is based on our legitimate interest, to object to any further processing on the grounds relating to your particular situation in accordance with Article 21 of the GDPR;
- to receive your Personal Data from us (right to data portability), to transmit such Personal Data to another data controller or to have us transmit your Personal Data to another data controller in accordance with Article 20 of the GDPR;
- to lodge a complaint regarding our processing of your Personal Data with the local data protection authority.

Contact details for data protection authorities in the European Union are available here: [http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm).

Pursuant to the data processing act and the Hungarian Civil Code,

1. You may turn to the National Authority for Data Protection and Freedom of Information (1125 Budapest, Szilágyi Erzsébet fasor 22/c.; [www.naih.hu](http://www.naih.hu)) or
2. You may turn to the court to enforce Your rights.

You may exercise your rights at [info@omnicoach.gg](mailto:info@omnicoach.gg).



### **Third Party Sites**

We only responsible to comply with this policy while you use our Website and Service. This privacy policy does not address, and we are not responsible for, the privacy, information or other practices of any third party operating any site to which the Website contain a link. In case you visit another website, even if it is recommended by us on our website, our privacy policy is not applicable, and we are not responsible for the activities of, and content available on such websites. The inclusion of a link to another site on the Website does not imply endorsement of the linked site by us.

### **Contacting us**

If you have questions regarding our Privacy Policy or associated practices, please contact us at [info@omnicoach.gg](mailto:info@omnicoach.gg) or if you wish to write to us, you can contact our customer care team at: OMNICOACH Ltd, Hungary, 7623 Pécs, Megyeri tér 1/B fszt. 9.

### **Miscellaneous**

The data processing and the Service shall be governed by and construed in accordance with Hungarian laws.

Due to the global character of the Internet, you undertake to proceed in compliance with the provisions of all applicable national measures in the course of using our Website. If any activity related to using the Service is not permitted according to the laws of your country, you shall exclusively bear responsibility for such usage.

You acknowledge that even if this Privacy Statement has been translated to other languages, this was done for the convenience of users only, and even in such case the English language version shall prevail. In case of any inconsistency between the English language Privacy Statement and any other language version, the English version shall prevail.

### **Policy Changes**

If we decide to change our privacy policy in whole or in part, we will inform you by posting a notice on our Website. Those changes will go into effect on the date posted in the notice. The new policy will apply to all current and past users of our Website and will replace any prior policies.

