

Information on personal data processing for Drumo.com Users

Effective as of 19.01.2021

Who is the data controller of my data?

The data controller of Users' personal data is Gamekit S.A., with its registered office in Warsaw at ul. Koszykowa 61, entered into the National Court Register kept by the District Court for the capital city of Warsaw, 12th Commercial Division of the National Court Register (KRS), under KRS no. 0000698534 (Further referred to as "Drumo")

How does Drumo protect my personal data?

We have implemented technical and organisational measures to ensure the security of Users' personal data. These measures include, among other things, access control to personal data, control of the processing of personal data, personal data anonymization. The access to personal data is only granted to authorised Drumo employees who are obliged to keep the confidentiality of the personal data. Furthermore, Drumo has implemented an appropriate data protection policy.

Will my personal data be visible to other Drumo users and Internet users?

Users' personal data, such as nicknames or avatar may be visible to other Drumo Users and may be indexed by search engines. All other data, including the data you provide during surveys will not be published and will not be available to other Drumo users. Please note that we will share your survey answers with survey organizers, who will become independent data controllers.

Do I have the right to access my data?

As far as the data that you provide during the registration process is concerned, each User has the right to request the access to, rectification or erasure of personal data or restriction of processing concerning the data. Furthermore, each User has the right to object to the processing of data. The data can be accessed in the Account. Once you complete the survey, we will transfer your answers to the survey organizer. If you would like to delete, amend or rectify your data provided during surveys or you would like to execute any other rights you have under GDPR regarding surveys, you should contact directly the organizer of each survey.

Why does Drumo process my data?

Drumo processes Users' personal data on the basis of and in connection with the concluded contract for the provision of services electronically. The purpose of the processing of personal data is to provide Users with services, described in detail in the Terms and Conditions, and the performance of the contract for the provision of services electronically.

Personal data needs to be provided in order to enter into the contract for the provision of services electronically. Failure to provide personal data will prevent Drumo from performance of services.

Drumo also uses electronic communication tools, such as email, to inform Users about new functionalities of the Website or provide other information that may be of interest to Users. This activity is based on Article 6(1)(f) GDPR. Drumo has assessed the impact of this activity on Users' privacy and, having considered Users' interests, has come to the conclusion that it will not have a negative impact on Users' privacy. The purpose of such use of the personal data brings significant benefits to Users, enabling them to follow news and changes regarding their topics of interest. Each User may opt out of this type of activity by changing settings in their accounts.

We may publish some testimonials of our Users. If you upload your photo, we may use it also for promoting your testimonials.

With Users' consent, Drumo processes personal data to profile Users and for the marketing communication purposes. Consent to these activities is voluntary and does not affect the possibility of entering into the contract for the provision of services electronically.

We also process your personal data in order to verify your identity and to ensure that all your actions within our Services are complete, accurate and honest. This is why, in some cases, we need to verify your phone number or other personal data. We limit the data we use for verification, however in some cases we may ask you to provide us with additional information.

How long will Drumo store my personal data?

Drumo will store personal data for the entire term of the contract for the provision of services. After the end of the contract, personal data will be stored until possible claims (including tax claims) become statute-barred.

Does Drumo transfer personal data outside the European Economic Area (the European Union)?

Drumo may transfer personal data outside the European Economic Area (European Union). This will always be done under a legitimate basis, such as data transfer agreements based on standard clauses.

Does Drumo transfer personal data to other entities (companies)?

We cooperate with different survey organizers. When completing surveys you share your personal information with Drumo. Drumo then transfers the same information to trusted third parties in order to develop services and products.

Note that in most of the cases the data is provided to third parties directly and voluntarily by you (you are directed to a third-party mobile or browser destination) and Drumo only acts as an intermediary.

Furthermore, the data collected by Drumo may be accessed by external companies providing such services to Drumo as hosting, server maintenance and database maintenance. These entities are recipients of the data, being the so-called processors acting on behalf of and on instructions from Drumo. Drumo ensures that these entities store data within the European Union or, if stored outside the European Union, that the data are adequately secured.

In the case of paid services, the personal data related to payments are transferred to the payment service provider. Drumo does not have the access to the personal data provided to the payment service provider. This applies in particular to credit card data.

Drumo also transfers anonymised cookies and other anonymised data to third parties regarding website Users. This data does not permit to decrypt the activity of a particular User on the Website, but it enables to determine Users' geographic, statistical and demographic data. The purpose of provision of such data is to customise advertisements and other similar messages directed at Users.

Do I have the right to data portability?

Yes. In accordance with Article 20 GDPR, every person has the right to data portability. The right to data portability means that everyone has the right to receive the personal data provided to Drumo, in a structured format. Everyone may transmit the data to another controller. Everyone may also request that Drumo transmit this

data to another controller specified by the data subject, provided it is technically feasible.

What is profiling and what is its purpose?

Profiling is the customisation of the content of the Website and offers to the interests and preferences of a relevant User. Profiling is done automatically; however, it remains under human control.

User profiling at Drumo is aimed at improving the quality of services provided to Users. For profiling purposes, Drumo uses data on Users' activities, interests and preferences on the Website and on other web pages. For profiling purposes, Drumo also uses information and data on User-added content on the Website, posted comments, liked content available on the Website and on other web pages, and other activities of Users on the Website. This data is processed by a special algorithm. Profiling carried out by Drumo, which has legal effects on Users, requires consent. Withdrawal of the consent to profiling does not affect the lawfulness of data processing under the consent before its withdrawal.

Can I withdraw my consent to profiling?

Consent to profiling is voluntary and can be withdrawn (revoked) at any time. It may be withdrawn in the Account on the Website.

What is marketing communication?

Marketing communication is the activity carried out via email or other similar tools in order to present Users with Drumo's and other entities' (companies') offers and promotions.

Can I withdraw my consent for marketing communications?

Consent to marketing communication is voluntary and can be withdrawn (revoked) at any time. It can be withdrawn by clicking the "unsubscribe me" link (or a similar link) in the email message received from Drumo. Withdrawal of the consent does not affect the lawfulness of data processing under the consent before its withdrawal.

Do I have the right to lodge a complaint related to the processing of personal data?

Yes, each User has the right to lodge a complaint with the supervisory authority.

Drumo.com Cookies Policy

Effective as of 1.09.2020.

What are cookies?

Cookies are small text files stored on web page user's computer drive. Cookies help web page administrators manage the web pages and improve the quality of the provided content.

What is device recognition?

Device recognition is a mechanism enabling to identify the type of the device used to access a web page. Such mechanisms also allow for the identification of the operating system used on a given device, the time zone from which the access is gained, the size and resolution of the screen, etc. These mechanisms are to adjust the appearance, size and other parameters of the website to a specific device. This information is not intended to identify a specific individual.

What other information does Drumo use?

Drumo uses information included in system logs (e.g. IP address) resulting from general principles applicable to Internet connections. The information is used for technical purposes related to the administration of our servers. Furthermore, IP addresses are used to collect general demographic statistics (e.g. regarding the region from which the connection is made).

Drumo uses cookies and other technologies and information that help it manage its web pages. For convenience, cookies and other similar technologies will be collectively referred to as cookies.

What types of cookies does Drumo use?

- Session cookies: these are files automatically deleted after closing the browser.
- Persistent cookies: these are files stored on the device for a certain period of time. Their storage does not depend on closing the browser.
- Proprietary cookies: set by Drumo websites.
- Third-party cookies: set by websites other than Drumo, such as Google Analytics.
- Drumo uses both proprietary cookies and third-party cookies.

Why does Drumo use cookies?

Cookies are necessary for Drumo in order to provide basic services related to the products it offers.

Drumo uses proprietary cookies to enable users to log in to their accounts. For this reason, at least one user authorisation per session is required in order to authorise a relevant user.

Drumo also uses cookies to optimise its web pages and customise their content to user's preferences. This applies in particular to cookies that enable to "see" how our website is used.

Cookies (including third-party cookies) are also used for statistical and analytical purposes. These files enable Drumo to determine the average time of visit on a web page and the total number of visits on websites managed by Drumo. These files are completely anonymous and do not enable Drumo to identify any specific individuals who use our websites.

Drumo also uses cookies for remarketing purposes. These files enable us to display advertisements of our website at other websites and other web pages. These cookies use, among other things, the history of visits on our websites. They include both proprietary cookies and third-party cookies.

Does Drumo sell or share cookies to other companies?

No, Drumo does not sell or share cookies to other companies.

How can I manage cookies?

You can manage cookies by changing browser settings. Most frequently, you can manage cookies in the “Settings” menu. This menu shows how to delete cookies, block storage of new cookies or set a notification when new cookies have been stored.

Is it possible to use Drumo website with cookies disabled?

Disabling cookies in a web browser usually does not prevent the user from using our services; however, this may cause some inconvenience. In particular, it may be difficult to access certain content; if the browser does not support cookies, this will prevent the user from logging in.

Links to other web pages

Drumo is not responsible for privacy policies used by owners or administrators of websites to which the user is redirected via links published at Drumo.com. We encourage users to read the content of the privacy statements available on these websites. The user is fully responsible for the content of the web page to which he/she is redirected via the link he/she has published at Drumo.com.