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# Privacy Policy

June 2022



## INTRODUCTION

This Privacy Policy describes how Reborn Developments™ collects and processes your personal information through the Reborn Developments™ websites and applications that reference this Privacy Notice.

Reborn Developments™ refers to an ecosystem comprising Reborn websites (whose domain names include but are not limited to [www.reborndevelopments.com](http://www.reborndevelopments.com)), mobile applications, clients, applets and other applications that are developed to offer Reborn Developments™ Services.

This Privacy Policy applies to all platforms, websites, and departments of Reborn Developments™.

By using Reborn Developments™ Services, you are consenting to the collection, storage, processing and transfer of your personal information as described in this Privacy Policy.

Reborn Alpha Limited Trading as Reborn Developments™, a private company limited by shares registered at 18 Mallow Street, Co. Limerick, Limerick, V94 N12Y, Ireland, is the data controller for personal information collected in connection with provision of Reborn Developments™ services.

## 1. What Personal Information does Reborn Developments™ collect and process? Why does Reborn Developments™ process my personal information? What are the legal basis for our use of personal information?

What personal information does Reborn Developments™ collect and process?

- email address;
  - name;
  - preferred pronouns;
  - gender;
  - date of birth;
  - home address;
  - phone number;
  - nationality;
  - tax residency;
  - device ID;
  - a video recording of you and a photographic image;
  - transactional information;
- 
- The Internet protocol (IP) address used to connect your computer to the Internet;
  - Login, e-mail address, password and location of your device or computer.

**Reborn Alpha Limited trading as Reborn Developments™.**

Registration N. 718948

Address: 18 Mallow Street, Co. Limerick, Limerick, Ireland V94 N12Y

Email: [legal@RebornDevelopments.com](mailto:legal@RebornDevelopments.com)



- Reborn Developments™ Services metrics (e.g. the occurrences of technical errors, your interactions with service features and content, and your settings preferences.
- version and time zone settings;
- transaction history;
- Information from other sources: we may receive information about you from other sources such as credit history information from credit bureaus;
- Information about your behavior: we may process information about you on your behavior and your activity for marketing and advertising purposes.

#### Why does Reborn Developments™ process my personal information?

- Transaction services. We use your personal information to process your orders, and to communicate with you about orders and services;
- Communicate with you. We Use your personal information to communicate with you in relation to Reborn Developments™ Services.
- We collect and process identity information and Sensitive Personal Data (as detailed in section 1) to comply with our Know Your Customer (“KYC”) obligations under applicable laws and regulations. and Anti-Money Laundering laws and regulations;
- Provide, troubleshoot, and improve Reborn Developments™ Services. we use your personal information to provide functionality. analyze performance, fix errors, and improve the usability and effectiveness of Reborn Developments™ Services.
- Fraud prevention and credit risks. We process personal information to prevent and detect fraud and abuse in order to protect the security of our users, Reborn Developments™ Services and others. We may also use scoring methods to assess and manage credit risks.
- Improve our services. We process personal information to improve our services and for you to have a better user experience;
- Recommendations and personalization. We use your personal information to recommend features and services that might be of interest to you, identify your preferences, and personalize your experience with Reborn Developments™ Services;

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Legal Basis for our use of personal information (EU and UK GDPR)

**Performance of a contract** when we provide you with products or services, or communicate with you about them. This includes when we use your personal information to take and handle orders, and process payments. **Legal obligation**; to comply with your legal obligations under applicable laws and regulations, and Anti-Money Laundering laws and regulations.

**Our legitimate interests** and the interests of our users when, for example, we detect and prevent fraud and abuse in order to protect the security of our users, ourselves, or others;

**Our legitimate interest** to improve our services;

**Your consent** when we ask for your consent to process your personal information for a specific purpose that we communicate to you. When you consent to processing your personal information for a specified purpose, you may withdraw your consent at any time and we will stop processing your data for that purpose.

## Can Children Use Reborn Developments™ Services?

Reborn Developments™ does not allow anyone under the age of 18 to use Reborn Developments™ Services.

## 3. What About Cookies and Other Identifiers?

We use cookies and similar tools to enhance your user experience, provide our services, and understand how customers use our services so we can make improvements. Depending on applicable laws in the region you are located in, the cookie banner on your browser will tell you how to accept or refuse cookies.

## 4. Does Reborn Developments™ Share My Personal Information?

Information about our users is an important part of our business and we are not in the business of selling our users' personal information to others. Reborn Developments™ shares users' personal information only as described below and with the subsidiaries or affiliates of Reborn Developments™ that are either subject to this Privacy Policy or follow practices at least as protective as those described in this Privacy Policy.

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Third party service providers: We employ other companies and individuals to perform functions on our behalf. Examples include analysing data, providing marketing assistance, processing payments, transmitting content, and assessing and managing credit risk.

These third-party service providers only have access to personal information needed to perform their functions, but may not use it for other purposes. Further, they must process the personal information in accordance with our contractual agreements and only as permitted by applicable data protection laws.

Business transfers: As we continue to develop our business, we might sell or buy other businesses or services. In such transactions, user information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Policy (unless, of course, the user consents otherwise). Also, in the unlikely event that Reborn Developments™ or substantially all of its assets are acquired, user information will be one of the transferred assets.

Protection of Reborn Developments™ and others: We release account and other personal information when we believe release is appropriate to comply with the law or with our regulatory obligations; enforce or apply our Terms of Use and other agreements; or protect the rights, property or safety of Reborn Developments™, our users or others. This includes exchanging information with other companies and organisations for fraud protection and credit risk reduction.

## 5. International transfers of personal data

Reborn Developments™ may transfer your data outside of the European Economic Area (“EEA”). Reborn Developments™ puts in place suitable technical, organizational and contractual safeguards (including Standard Contractual Clauses), to ensure that such transfer is carried out in compliance with applicable data protection rules, except where the country to which the data is transferred has already been determined by the European Commission to provide an adequate level of protection.

## 6. How Secure is My Information?

We design our systems with your security and privacy in mind. We work to protect the security of your personal information during transmission by using encryption protocols and software. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of your personal information. Our security procedures mean that we may ask you to verify your identity to protect you against unauthorised access to your account password. We recommend using a unique password for your Reborn Developments™ account that is not utilized for other online accounts and to sign off when you finish using a shared computer.



## 7. What About Advertising?

In order for us to provide you the best user experience, we may share your personal information with our marketing partners for the purposes of targeting, modeling, and/or analytics as well as marketing and advertising. You may opt-out of sharing personal information with our marketing partners, unless we have a legitimate interest to do so.

## 8. What Information Can I Access?

You can access your information, including your name, address, payment options, profile information, and transaction history by reaching out to our support team.

## 9. What Rights Do I Have?

If you have any questions or objection as to how we collect and process your personal information, please contact [legal@reborndevelopments.com](mailto:legal@reborndevelopments.com)

When you consent to our processing your personal information for a specified purpose, you may withdraw your consent at any time.

In addition, **subject to applicable law**, you have the right to request access to, correct, and delete your personal data, and to ask for data portability. You may also object to our processing of your personal data or ask that we restrict the processing of your personal data in certain instances, by contacting [legal@reborndevelopments.com](mailto:legal@reborndevelopments.com)

- **Right to access:** you have the right to obtain confirmation that your Data are processed and to obtain a copy of it as well as certain information related to its processing;
- **Right to rectify:** you can request the rectification of your Data which are inaccurate, and also add to it. You can also change your personal information in your Account at any time
- **Right to delete:** you can, in some cases, have your Data deleted;
- **Right to object:** you can object, for reasons relating to your particular situation, to the processing of your Data. For instance, you have the right to object to commercial prospection;
- **Right to limit the processing:** in certain circumstances, you have the right to limit the processing of your Data;
- **Right to portability:** in some cases, you can ask to receive your Data which you have provided to us in a structured, commonly used and machine-readable format, or, when this is possible, that we communicate your Data on your behalf directly to another data controller;
- **Right to withdraw your consent:** for processing requiring your consent, you have the right to withdraw your consent at any time. Exercising this right does not affect the lawfulness of the processing based on the consent given before the withdrawal of the latter;
- **Right to define the instructions relating to the use of your personal data post mortem:** you have the right to define instructions relating to the retention, deletion and communication of your Data after your death;
- **Right to lodge complaint to the relevant data protection authority.**



## 10. How Long Does Reborn Developments™ Keep My Personal Information?

We keep your personal information to enable your continued use of Reborn Developments™ Services, for as long as it is required in order to fulfil the relevant purposes described in this Privacy Notice, and as may be required by law such as for tax and accounting purposes, compliance with Anti-Money Laundering laws, or as otherwise communicated to you.

## 11. Contact Information

Our data protection officer can be contacted at [legal@reborndevelopments.com](mailto:legal@reborndevelopments.com), and will work to address any questions or issues that you have with respect to the collection and processing of your personal information.

## 12. Conditions of Use, Notices and Revisions

If you choose to use Reborn Developments™ Services, your use and any dispute over privacy is subject to this Policy and our Terms of Use. If you have any concerns about privacy at Reborn Developments™, please contact us with a thorough description, and we will try to resolve it. You also have the right to contact your local Data Protection Authority.

Our business changes constantly, and our Privacy Policy will change also. You should check our websites frequently to see recent changes. If you do not agree with the revised content, you shall stop accessing Reborn Developments™ immediately. When an updated version of the Privacy Policy is released, your continued access to Reborn Developments™ means that you agree to the updated content and agree to abide by the updated Privacy Policy. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account.