

# PRIVACY POLICY

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## 1. COMMITMENT

Virtual World Services GmbH as operator of the website [www.virwox.com](http://www.virwox.com) is concerned about the protection of personal data. When using personal data, we therefore comply with all requirements of the General Data Protection Regulation (GDPR) and the Austrian Data Protection Amendment Act (DSG) and endeavor to be transparent.

We process the personal data of our users according to the principles of legality, good faith, transparency, correctness, purpose, data minimization and retention period limitation.

## 2. RESPONSABILITY

Questions may be sent to the following email address: [support@virwox.com](mailto:support@virwox.com)

## 3. LAWFULNESS OF PROCESSING

We process personal data exclusively for the purpose of providing the services offered by us. The following lawful reasons for processing apply:

### 3.1. Performance of a contract according to article 6, paragraph 1(b) GDPR

The processing of personal data is necessary in order to provide and document our services.

If business partners do not want to make the data available, concluding the contract or executing the order may be impossible. An existing contract can no longer be executed under these circumstances and may have to be terminated.

We inform our business partners about the purpose of the data processing when collecting the data.

### 3.2. Legitimate Interests according to article 6, paragraph 1(f) GDPR

In order to protect ourselves and our customers from fraudulent activities and money laundering, and for the purpose of documentation for potential disputes, we must also collect and store some personal information (e.g. IP addresses).

## 4. CATEGORIES OF PERSONAL DATA

Virtual World Services GmbH processes personal data that is collected or transmitted by business partners as part of a business relationship.

The following categories of personal data are subject of processing:

- Customer data: name/company, address, contact details (e-mail, phone), username, password
- Verification data: ID document, address verification

- Financial data: addresses of PayPal and Skrill accounts and related transaction data, bank and bank transfer data
- Log data: IP-Addresses, transaction data, device data (operating system, device type), browser version
- Business and customer service correspondence

## 5. RECIPIENTS

Recipients of personal data are those of our employees who need them to fulfill their contractual or legal obligations and to safeguard legitimate interests.

Depending on the service, it may be necessary to forward the data to external service providers. We ensure compliance with data protection regulations when selecting our processors and have made arrangements with contract processors to ensure that personal data is processed confidentially and accurately. For deposits and withdrawals the following service providers will receive personal data:

- Paypal Express: PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg
- Sofortüberweisung: Klarna Bank AB, Sveavägen 46, 111 34, Stockholm, Sweden
- Paysafecard und Skrill: Paysafe Prepaid Services Company Ltd, Floor 27, 25 Canada Square, London, E17 4AU, GB

## 6. DATA RETENTION

The collected personal data will be stored for the duration of the business relationship and beyond that according to the legal retention periods. In this respect, Virtual World Services GmbH is subject to record keeping obligations under the following Austrian laws:

- Unternehmensgesetzbuch (UGB),
- Bundesabgabenordnung (BAO),
- Allgemein Bürgerliches Gesetzbuch (ABGB)

## 7. COOKIES

Our website uses so-called cookies. These are small text files that are stored on your device using the browser. They do no harm. We use cookies to make our offer user-friendly. Some cookies remain stored on your device until you delete them. They allow us to recognize your browser on your next visit. If you do not want this, you can set up your browser so that it informs you about the setting of cookies and you allow this only in individual cases. Disabling cookies may limit the functionality of our website.

## **8. GOOGLE ANALYTICS**

Our website uses functionality of the “Google Analytics” toolset by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States (“Google”). Google Analytics collects the number of users and usage patterns on our site. Cookies are used to analyze the use of the website by our users, and the resulting information is transmitted to and stored on servers in the US. We have entered into an appropriate data processing contract with Google. If you do not want your usage behavior recorded on our website, you can prevent this by setting up your browser so that no cookies are stored.

## **9. YOUR RIGHTS**

Business partners have a right to request information about the processed personal data, their correction, deletion and limitation of processing by Virtual World Service GmbH unless legal or contractual provisions or a legitimate interest contradict these rights.

Furthermore, there is also a right to object to the processing and the right to data portability in accordance with the requirements of data protection law.

Complaints can be submitted to the Austrian Data Protection Authority ([www.dsb.gv.at](http://www.dsb.gv.at)).

## **10. CONFIDENTIALITY**

All employees of Virtual World Service GmbH are subject to the confidentiality of the information entrusted or disclosed to them in the course of their work.

## **11. DATA SECURITY**

Data security is very important to us. We have taken all necessary technical and organizational measures to ensure the security of the data processing and to process the personal data in such a way that they are protected against access by unauthorized third parties. The IT infrastructure complies with common security requirements and is regularly reviewed.