

# Privacy Policy

Last updated: October 13, 2020

Affcool Ltd (the “Company,” “we,” “us,” or “our”) is the owner and operator of [www.myvrealty.com](http://www.myvrealty.com) (“Website”). We respect your privacy and take it seriously. This Privacy Policy describes how we collect, use, disclose and secure your personal data when you access or interact with the Website and your rights as a data subject. We will not use or disclose your personal data with anyone except as described hereunder. By using the Website, and submitting your personal data to us, you agree to the collection and use of your personal data in accordance with this Privacy Policy.

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## 1. Who is covered by this Privacy Policy?

Persons who visit our Website, who interact with the content on our Website (for example by leaving comments on news articles, sending enquiries etc.), and who subscribe to receive marketing material from us are described as ‘users’ for the purposes of this Privacy Policy. This Privacy Policy applies to all Website users.

In the event a person who is excluded from accessing the Website by our Terms of Use gains access to the Website in violation of the Agreement, such a person is still covered by this Privacy Policy. Persons under the age of 13 (“child” or “children”) are excluded from our Website. If you are under the age of 13, you are prohibited from accessing the Website.

This Privacy Policy does not apply to the personal data we collect from sources outside the Website.

## 2. Definitions

Any use of the following terms in this Privacy Policy shall have the meaning as defined hereunder:

<b>Data Controller</b>	means “the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law” as defined in Article 4(7) of the General Data Protection Regulation;
<b>Data Subject</b>	means a natural person whose personal data is processed by the Company and its processors;
<b>GDPR</b>	means the General Data Protection Regulation 2061/679;
<b>Personal Data</b>	means “any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an

	identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person” as defined in Article 4(1) of the General Data Protection Regulation;
<b>Processing</b>	means “any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction” as defined in Article 4(2) of the General Data Protection Regulation.
<b>Service</b>	means the provision of the Website.

### 3. How do we collect and use your information?

We collect information about you in multiple ways including information that you submit directly to us when you interact with our Website, information that we automatically collect from your use of the Website and information that we obtain from third-party services.

We will only collect and process your information if we have a lawful basis for processing your information which may include your consent, our contractual obligations or our legitimate interest in processing your personal data which does not override your rights.

Please note that you have the right to decline to submit any personal data when requested by the Company. However, you understand that if you refuse to provide any information that is required for the provision of our Website, your refusal may lead to some Website functionality being unavailable to you.

We collect your personal data in the following situations:

#### 3.1. When you post comments on the Website

We collect your personal data when you post comments on news articles or other content on the Website. We will ask you to provide us with your full name, your

email address and the content of your submission. Please note that when you post a comment on the Website, your name and the content of your comment will be visible to other users when they view the page where you left your comment. You are advised not to provide any personal information in any of your comments that you do not wish to be made publicly available.

How do we use your data?

We use your data to enable you to engage in a public conversation with the Company and other users on the Website.

Legal Basis of Processing

The legal basis of our processing is our legitimate interest as set out in Article 6(1)(f) of the GDPR.

Data Retention Duration

We may retain this data until such time that you specifically request us to remove it from our Website.

### **3.2. When you send us an enquiry**

We collect your personal data when you send us your enquiries by completing the contact form on our Website. We ask you to provide us with your full name, your email address and the content of your enquiry.

How do we use your data?

We use your personal data to respond to your enquiries.

Legal Basis of Processing

The legal basis for our processing of this personal data is our legitimate interest as provided in Article 6(1)(f) of the GDPR.

Data Retention Duration

We retain the personal data associated with your enquiry for a maximum period of six months from the date of last communication. We will safely delete all enquiry related data from our records after the lapse of the six month period unless we are required to keep this information on other lawful grounds.

### **3.3. When you subscribe to receive marketing material**

When you subscribe to our newsletter, we collect your full name and your email address.

How do we use your data?

We use this data to send you our newsletter and other promotional material that we believe you would find interesting.

#### Legal Basis of Processing

Our legal basis for processing this data is your consent, which you freely grant us when you opt-in to receive marketing material from us as set out in article 6(1)(a) of GDPR.

#### Data Retention Duration

We will only retain personal data associated with your subscription as long as you are subscribed to receive marketing material. You can withdraw your consent at any time by clicking the unsubscribe button at the bottom of our marketing email. If you unsubscribe from our newsletter, we will immediately stop processing your personal data for our direct marketing purposes and remove you from our mailing list.

### **3.4. Technical Data**

We automatically collect some technical data from you when you access our Website including but not limited to your Internet Protocol (IP) address, your browser type and version, hardware mode of your device, your time zone setting, and other similar information.

#### How do we use your data?

We use this data for purposes, including but not limited to:

- Maintaining and improving our Website; and
- For detecting and preventing spam or other similar unauthorised activities.

#### Legal basis of processing

Our lawful basis for processing this data is our legitimate interest, which does not override your data rights as set out in article 6(1)(f) of GDPR.

#### Data Retention Duration

We will only retain this data for as long as we require it for our internal business purposes.

### **3.5. Location Data**

Every time you access the Website, we automatically collect information about the location of your device.

#### How do we use your data?

We use this data to display location-relevant content to you. Please note that you have the choice to refuse the collection of location data when requested.

#### Legal basis of processing

Our legal basis for processing this data is your consent, which you freely grant us allowing us to access your location data as set out in article 6(1)(a) of GDPR.

Data retention

We will only retain this data for a period of 30 days from the date of collection.

### **3.6. Cookies Data**

We also collect some data through the use of cookies, pixels, and tags when you visit our Website.

How do we use your data?

We use third-party tools that make use of cookies, including Google Analytics that collects your IP address.

Google Analytics is a web analytics service offered by Google Inc that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Website. Google may share this data with other services owned and operated by Google Inc.

If you do not wish your personal data and activities to be tracked, you can easily install the Google Analytics Opt-out Browser Add-on –

<https://tools.google.com/dlpage/gaoptout> – for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their personal information from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit

<https://policies.google.com/privacy?hl=en>.

Legal basis of processing

The legal basis for our processing of this personal data is our legitimate interest as provided in Article 6(1)(f) of the GDPR.

Data retention

To learn more about the duration for which various cookies are stored, please visit our cookie policy.

## **4. Disclosing your personal data**

We do not sell or rent your personal data to any third party. However, we may disclose your personal data to third parties as outlined hereunder:

- Our employees and service providers

We will share and disclose your data to our employees, contractors and other service providers who need access to such data to deliver our Website to you.

- **Merger or acquisition**

If we sell or otherwise transfer any part or whole of our business, we reserve the right to transfer your personal data as part of our assets to the entity that acquires or merges with our Company.

- **Comment data**

When you create, and post any comment on the Website, your comment and some of the associated data will become publicly visible to other users on the Website, and such content can also be discoverable to users on the world wide web.

- **Valid requests for information**

We may be required to disclose your personal data to local and international government authorities, law enforcement bodies, courts of law, or other government agencies as and when required for compliance with the law.

- **Enforcement of rights or to defend ourselves**

We may also disclose your information during any legal action or proceedings to assert our rights and interests under our Agreement with you or to defend any legal claims you or another party makes against us.

- **Advertising**

We may use third-party advertising partners to serve ads to you on our behalf. Such third-party vendors use cookies to inform, optimise, and serve ads based on your use of the Website.

- **Email distribution tools**

If you subscribe to receive newsletters or other marketing material from us on our Website, we will use third-party email distribution tools to send emails to you. Your name and email address will be stored on these email distribution tools.

- **Anonymous statistical data**

We may share anonymous statistical data we collect from you during your use of the Website with third parties for our business purposes.

## 5. Security of your data

The security of your data is important to us, and we take all reasonable and commercially viable steps to protect your data from unauthorised access, use,

modification, destruction, or loss. Despite our use of best practices, you understand and accept that no mode of transmission over the internet is completely secure, which is why we cannot offer any guarantees as to the absolute security of your data.

## 6. Transfer of your data

The Company is operating from its primary place of business in Malta. We may sometimes share your personal data with our data processors who are located in third countries. If you are located in the European Economic Area (EEA), we may transfer your data to third countries where data protection laws are less stringent than those in the EEA. Whenever we transfer your data to any third country that does not have adequate data protection, we will take steps to ensure that your personal data receives the same level of protection as provided within the EEA. We will use safeguards, including Standard Contractual Clauses as provided by the European Commission to ensure your privacy rights are protected by the receiving entity in such a third country.

## 7. Your data rights

If you are currently in the EEA, your rights relating to your personal data that we hold are as follows:

- Right to access your personal data  
As a data subject, you may ask us to provide you with a copy of all your personal data that we have for you.
- Right to rectification  
You have the right to rectification of any incorrect or incomplete information. You can exercise your right by sending us an email at the contact information provided at the bottom of this Privacy Policy with your rectification request.
- Right to withdraw consent  
If you subscribe to receive any direct marketing material from us by opting-in, you can withdraw your consent by clicking the “unsubscribe” button at the bottom of our marketing email or by contacting us with your request.
- Right to erasure of personal data  
In limited circumstances, you may have the right to request the erasure of your personal data, such as where you have a reason to believe that your personal data is being processed unlawfully or where the personal data is retained for longer than specified in our data retention policies.
- Right to lodge a complaint

If you believe that our privacy practices infringe on your privacy rights, we will appreciate it if you would contact us to discuss the matter first by sending an email to [info@myvrealty.com](mailto:info@myvrealty.com). If you are dissatisfied with our response, you also have the right to complain to your local data protection authority or

**Office of the Data Protection Commissioner**

Data Protection Commissioner: Mr Joseph Ebejer  
2, Airways House  
High Street, Sliema SLM 1549  
email: [commissioner.dataprotection@gov.mt](mailto:commissioner.dataprotection@gov.mt)

## 8. Third-Party Links

Our Website contains links to third-party websites that are not owned or operated by us. Should you decide to click on any such third party links, you will be directed to such a third party's website. These third-party websites are governed by their own Terms and Conditions and Privacy Policy. We encourage our users to review the third-party Terms and Privacy Policy before making use of such a third party website. The presence of any third party links on our Website does not constitute an endorsement or recommendation of such third party, and we cannot be held responsible for such third party's actions.

## 9. Changes

We may update this Privacy Policy from time to time. If we make any material changes to this Privacy Policy, we will notify you by email (if you have consented to receive communication from us) or by updating the last modified date on the top of the webpage where this Privacy Policy appears. It is solely your responsibility to periodically review this Privacy Policy to familiarise yourself with any changes.

## 10. Data Controller

The Company is the data controller for the personal data that we collect from you through the Website. If you have any questions relating to our privacy practices, this Privacy Policy, or if you wish to exercise your data rights, please contact us at:

**Affcool Ltd**

Office 9, Triq In-Naxxar,  
San Gwann SGN 9030,  
Malta

Email: [info@myvrealty.com](mailto:info@myvrealty.com)