

Privacy Policy

This document governs the privacy of DevRoom.

1. Your Rights

When using DevRoom services, such as our website, bots or otherwise, and submitting personal data (PD) to us, you may have certain rights under the General Data Protection Regulation (GDPR) and other laws. Depending on the legal basis for processing your PD, you may have some or all of the following rights:

A. The right to be informed

You have the right to be informed about the personal data we collect from you and how we process it.

B. The right of access

You have the right to get confirmation that your personal data is being processed and have the ability to access your personal data.

C. The right of rectification

You have the right to have your personal data corrected if it is inaccurate or incomplete.

D. The right to erasure (right to be forgotten)

You have the right to request the removal or deletion of your personal data if there is no compelling reason for DevRoom to continue processing it.

E. The right to restrict processing

You have a right to 'block' or restrict the processing of your personal data. When your personal data is restricted, we are permitted to store your data, but not process it further.

F. The right to data portability

You have the right to request and get your personal data that you provided to us and use it for your own purposes. We will provide your data to you within 30 days of your request. To request your personal data, please contact us directly via email or Discord.

G. The right to object

You have the right to object to us processing your personal data for the following reasons:

1. Processing was based on legitimate interests or the performance of a task in the public interest or exercise of official authority (including profiling)
2. Direct marketing (including profiling)
3. Processing for purposes of scientific or historical research and statistics
4. Rights in relation to automated decision-making and profiling

H. Automated individual decision-making and profiling

You will have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

I. Filing a Complaint with Authorities

You have the right to file a complaint with the supervisory authority if your information has not been processed in compliance with GDPR. In Italy, you

can contact the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) to report your concerns. If the supervisory authority does not address your complaint adequately, you may have the right to seek judicial remedy.

For further details about your rights under the law, please visit the Italian Data Protection Authority's website:

https://www.garanteprivacy.it/web/garante-privacy-en/home_en.

2. Definitions

'Non-personal data' (NPD) is information that is in no way personally identifiable. 'Personal Data' (PD) 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, 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. PD is in many ways the same as Personally Identifiable Information (PII). However, PD is broader in scope and covers more data.

A "Visitor" is someone who merely browses DevRoom services. A "Member" is someone who has registered with us to use our services or buy our products. The term "User" is a collective identifier that refers to either a Visitor or Member.

3. Information We Collect

Generally, you are able to control the amount and type of information that you provide to DevRoom when using our services.

Nonetheless, we may collect data such as:

- Legal Names
- Emails
- Discord User IDs
- Addresses that you provide to us through Paypal, Stripe, or any other payment method
- Content you create, such as Discord messages and their content
- Profile pictures (avatars) from Discord
- Types of content that you view or interact with, and how you interact with it
- Purchases or other transactions you make, including, where applicable, credit card information
- The time, frequency and duration of your activities on our products
- The device and software you're using, and other device characteristics where applicable
- IP addresses
- Information from cookies and similar technologies
- Phone numbers that you provide to us through Paypal, Stripe, or any other payment method

4. Payment Processors

When you make payments through PayPal or Stripe, these services collect additional information for processing transactions. You can review their privacy practices via their respective privacy policies:

- PayPal Privacy Policy: <https://www.paypal.com/us/legalhub/privacy-full>. This document details the information PayPal collects and how it is used and protected.
- Stripe Privacy Policy: <https://stripe.com/privacy>. This document explains what Stripe collects, how it uses the data, and its security measures.

Please refer to these policies for more information on how these third-party services handle your data.

5. What happens if you don't give us your PD

If you do not provide us with enough PD, we may not be able to provide you with all our products and services. However, you can access and use some parts of our services without giving us your PD.

6. We collect your PD in the following ways

A. Automatic Information

We automatically receive information from Discord, Paypal, Stripe, and any other payment method you use to buy our Services . This information includes your publicly available user data.

B. Balance Registration

When signing up to our Balance service, we collect your email address. We may also collect your legal name and your bank account's currency.

C. When Buying Products or Services

If you buy products or services from us, we collect your first and last name, email address and physical address. We may also collect your phone number. This information is provided to us via Paypal, Stripe, and any other payment method you use to buy our Services.

D. Online Forms

We provide online forms to fill out. The information you enter into these online forms may contain PD.

E. Our Website

We receive information when you use our website, such as IP addresses, device information, general location, cookie information and web browser information.

7. How Your Information Is Used

We use the information we receive from you to:

- Provide our products and services you have requested or purchased from us

- Personalise and customise our content
- Make improvements to DevRoom
- Contact you with updates to DevRoom
- Resolve problems and disputes
- Contact you with marketing and advertising that we believe may be of interest to you

8. Communications

When we communicate with you about DevRoom, we may use the email address you provided to us when signing up to Balance Registration. Usually, we will communicate with you via our dedicated Discord Bots. We may send you promotional information about DevRoom or offers from us or our affiliates unless you have opted out of receiving such information.

9. Sharing Information with Affiliates and Other Third Parties

We do not sell or rent your PD to third parties for marketing purposes. However, for data aggregation purposes we may use your NPD which may be sold to other parties at our discretion. Any such data aggregation would not contain any of your PD. We may provide your PD to third-party service providers we hire to provide services to us. These third-party service providers may include but are not limited to: payment processors, web analytics companies, advertising networks, data management services, accountants, law firms, auditors, shopping cart and email service providers.

10. Sharing Information with Facebook and Google for Marketing Purposes

We may share your PD with third parties for similar audience marketing purposes. Similar audience marketing is also called lookalike audience marketing. The third parties we share your PD with for this type of marketing include Facebook and/or Google. Using your PD, for similar audience marketing or lookalike marketing helps us find new audiences (users and customers) based on similar interests to yours. This helps us improve our marketing services. Your PD is only shared with Facebook and Google for this type of marketing. By using DevRoom, you are giving your consent for your PD to be used for the marketing purposes described within this section.

11. Legally Required Releases of Information

We may be legally required to disclose your PD if such disclosure is (a) required by law or other legal process; (b) necessary to assist law enforcement officials or government enforcement agencies; (c) necessary to investigate violations of or otherwise enforce our Legal Terms; (d) necessary to protect us from legal action or claims from third parties, including you and/or other users or members; or (e) necessary to protect the legal rights, personal or real property, or personal safety of DevRoom, users, employees, Freelancers and affiliates.

12. Disclosures to Successors

If DevRoom is sold or merges in whole or in part with another business that would become responsible for providing DevRoom services to you, we retain the right to transfer your PD to the new business. The new business would retain the right to use your PD according to the terms of this Privacy Policy as well as to any changes this Privacy Policy as instituted by the new business.

We also retain the right to transfer your PD if DevRoom files for bankruptcy and some or all of our assets are sold to another individual or business.

13. Community Discussion Boards

DevRoom may offer the ability for users to communicate with each other through online community discussions boards, Discord or other mechanisms. We do not filter or monitor what is posted on such discussion boards. If you choose to post on these discussion boards, you should use care when exposing any PD, as such information is not protected by this Privacy Policy nor are we liable if you choose to disclose your PD through such postings. Also, the PD you post on these community discussion boards may be available worldwide by means of the Internet. We cannot prevent the use or misuse of such information by others.

14. Retaining and Destroying Your PD

We retain information that we collect from you (including your PD) only for as long as we need it for legal, business or tax purposes. Your information may be retained in electronic form, paper form or a combination of both. When your information is no longer needed, we will destroy, delete or erase it.

15. Updating Your PD

You can update your PD using DevRoom services such as our Discord Bots. If no such services exist, you can contact us directly. However, we may keep your PD as needed to enforce our agreements and to comply with any legal obligations.

16. Revoking Your Consent for Using Your PD

You have the right to revoke your consent for us to use your PD at any time. Such an opt out will not affect disclosures otherwise permitted by law including, but not limited to, (a) disclosures to affiliates and business partners; (b) disclosures to third-party service providers that provide certain services for DevRoom, such as credit card processing, computer system services, data management services; (c) disclosures to third parties as necessary to fulfill your requests; (d) disclosures to governmental agencies or law; (e) previously completed disclosures to third parties; or (f) disclosures to third parties in connection with subsequent contests or promotions you may choose to enter, or third-party offers you may choose to accept. If you want to revoke your consent for us to use your PD, please contact us directly.

17. Links to Other Websites

DevRoom may contain links to other websites. These websites are not under our control and are not subject to this Privacy Policy. These websites will likely have their own privacy policy. We have no responsibility for these websites and we provide links to these websites solely for your convenience. You acknowledge that your use of and access to these websites are solely at your risk. It is your responsibility to check the privacy notices of these websites to see how they treat your PD.

18. Protecting Children's Privacy

Even though DevRoom is not designed for use by anyone under the age of 13, we realise that a child under the age of 13 may attempt to access DevRoom. We do not knowingly collect PD from children under the age of 13. If you are the parent or guardian and believe that your child is using DevRoom, please contact us directly. Before we remove any information, we may ask for proof of identification to prevent malicious removal of information. If we discover that a child is accessing our website, we will delete his/her information within a reasonable period of time. You acknowledge that we do not verify the age of our users nor do we have any liability to do so.

19. Use of your Credit or Debit Card

You may have to provide a credit or debit card to buy products and services from our website. We use third-party billing services and have no control over these services. We use our commercially reasonable efforts to make sure your credit or debit card number is kept strictly confidential by using only third-party billing services that use industry-standard encryption technology to protect your credit or debit card number from unauthorised use. However, you understand and agree that we are in no way responsible for any misuse of your debit or credit card.

20. Transferring Personal Data from the European Union

PD that we collect from you may be stored, processed and transferred between any of the countries in which we operate. DevRoom is a global company and we may own servers in a number of different countries, including the United States. The European Union (EU) has not found the United States to have an adequate level of protection of PD under Article 45 of the GDPR. DevRoom relies on derogations for specific situations as defined in Article 49 of the GDPR. For EU customers and users, with your consent, your PD may be transferred outside the European Union and sometimes to the United States. We will use your PD to provide the goods, services and/or information you request from us to perform a contract with you or to satisfy a legitimate interest of our company in a manner that does not outweigh your freedoms and rights. Wherever we transfer, process or store your PD, we will take reasonable steps to protect it. We will use the information we collect from you in accordance with this Privacy Policy. By using or accessing DevRoom and/or its services or protects, you agree to the transfers of your PD described within this section.

21. Changes to this Privacy Policy

We reserve the right to change this Privacy Policy at any time. If DevRoom decides to change this Privacy Policy, we will update our users via Discord so our customers are always aware of what information we collect, use and disclose. If at any time we decide to disclose or use your PD in a method different from that specified at the time it was collected, we will provide advanced notice via email or Discord. Otherwise we will use and disclose our users' and customers' PD in agreement with this Privacy Policy when the information is collected. In all cases, your continued use of DevRoom, and/or its services or products after any change to this Privacy Policy will constitute your acceptance of such change.