**VIRTUS.PRO PRIVACY POLICY**

**Last updated: March 22, 2023**

1. **About us and this Privacy Policy**
   1. We are VP ESPORT LLC, a company located at Keru st. 95/3 Arabkir, 0033 Yerevan, Armenia.
   2. This Privacy Policy sets out how we collect and use your personal information when you use our website virtus.pro (the “Website”) and the choices available to you in connection with our use of your personal information.
   3. This Privacy Policy is supplemented by the Cookie Policy available at <https://virtus.pro/cookiepolicy/>. In case of any contradictions between this Privacy Policy and the Cookies Policy, this Privacy Policy will prevail.
   4. By making available the Website we, acting reasonably and in good faith, believe that you:
2. provide true information about yourself to the extent necessary for use of the Website;
3. are aware of and accept this Privacy Policy.
   1. We do not verify the information received from you, except where such verification is necessary in order for us to fulfill our obligations to you.
4. **Information we collect about you**
   1. In order to provide you with access to the use the Website, we will improve, develop and implement new features to the Website, and enhance the available Website functionality. To achieve these objectives, and in compliance with applicable laws, we will collect, store, aggregate, organize, extract, compare, use, and supplement your data (hereinafter all is the above is referred to as “processing”). We will also receive and pass this data to our affiliates and partners as set out in the table below and section 3 of this Privacy Policy.
   2. We set out in more detail the information we collect when you use the Website, why process it and the legal bases below.

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| **Information collected** | **Purpose** | **Legal basis** |
| Data received when you access the Website, including information regarding technical devices, technical interaction with the Website (your host IP address, your operating system, browser type, geographic position, the Internet provider) and your browsing behavior and further actions on the Website. | We use your data for internal review in order to constantly improve the content of the Website, to optimize your user experience, to understand any errors you may encounter when using the Website, to notify you of changes to the Website.  We use this information in order to tailor and improve the advertisements that may be presented on the Website and to measure the effectiveness of these advertisements. | Legitimate interests |
| Information that is automatically received at the time of access to the Website with the use of cookies. | Please see our Cookie Policy which sets out the types of cookies we use and what we use these cookies for. | Consent |
| Information that you submit to us when you send us an email on a particular issue to one of addresses indicated at the Website (certain information about you including your name, address and other related details you provide). | We use the information we collect from you for the purposes of:   1. Providing you with an appropriate reply to your request; 2. Protecting the rights and interests of VP ESPORT LLC and others. | Legitimate interests |

* 1. Our legitimate interests include:

1. maintaining and administrating the Website;
2. providing you with the access to the Website;
3. improving the content of the Website;
4. interacting with you within the framework of the requests received from you;
5. protecting the rights in interests of VP ESPORT LLC and third parties;
6. complying with any contractual, legal, or regulatory obligations under any applicable law.
   1. Your personal information may also be processed if it is required by a law enforcement or regulatory authority, body or agency or in the defense or exercise of legal claims. We will not delete personal information if it is relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved and/or during the term that is required and/or permissible under applicable law.
   2. If we intend to further process your data for any other purpose to those set out in this Privacy Policy, we shall provide you with details of this further purpose before we commence processing.
7. **Data sharing**
   1. We may share your personal information with the following third parties:
8. our affiliates, for administrative and management purposes, subject to us taking reasonable measures to ensure that your information is kept secure at all times;
9. trusted businesses or persons who perform services and process your personal information for us for the purposes listed above, based on our instructions, subject to us taking reasonable measures to ensure that your information is kept secure at all times;
10. to other companies or individuals if we have a belief in good faith that it is reasonably necessary to:

* meet any applicable law, regulation, legal process or enforceable governmental request;
* detect, prevent or otherwise address fraud, security or technical issues;
* protect against harm to the rights, property or safety of VP ESPORT LLC, our customers or the public, as required or permitted by law.

1. **International transfers**
   1. We may transfer and maintain on our servers or databases some of your personal information outside the Republic of Armenia.
   2. The countries to which we transfer your data may not have the same data protection laws as your jurisdiction. We take reasonable cyber security measures to ensure your data is adequately protected.
2. **Retention periods**
   1. We will retain your personal information for as long as required to perform the purposes for which the data was collected depending on the legal basis for which that data was obtained and/or whether additional legal/regulatory obligations mandate that we retain your personal information during the term that is required and/or permissible under applicable/relevant law.
3. **Your rights** 
   1. You have the following rights, in certain circumstances, in relation to your personal information:
4. Right to access your personal information;
5. Right to rectify your personal information: you can request that we update, block or delete your personal data, if the data is incomplete, outdated, incorrect, unlawfully received or no longer relevant for the purpose of processing;
6. Right to restrict the use of your personal information;
7. Right to request that your personal information is erased;
8. Right to object to processing of your personal information;
9. Right to data portability (in certain specific circumstances);
10. Right not to be subject to an automated decision;
11. Right to lodge a complaint with a supervisory authority.
    1. You may have other rights under the laws of your country of residence.
    2. If you would like to exercise these rights, please contact Support Service at dpo@virtus.pro or send your request to us, in writing to Keru st. 95/3 Arabkir, 0033 Yerevan, Armenia. We will aim to respond to you within 30 days from receipt of request. We will need to verify your identity before we are able to disclose any personal data to you.
12. **Security measures**
    1. We take technical, organizational and legal measures, including, where suitable, encryption, to ensure that your personal data are protected from unauthorized or accidental access, deletion, modification, blocking, copying and dissemination.
13. **Changes to this Privacy Policy**
    1. From time to time, we may change and/or update this Privacy Policy. If this Privacy Policy changes in any way, we will post an updated version on this page. We will store the previous versions of this Privacy Policy in our documentation archive. We recommend you regularly review this page to ensure that you are always aware of our information practices and any changes to such.
14. **Contact us**
    1. If you have any questions, please send your inquiries to Service Support at [dpo@virtus.pro](mailto:dpo@virtus.pro) or send your request to us, in writing to Keru st. 95/3 Arabkir, 0033 Yerevan, Armenia. We will aim to respond to you within 30 days from receipt of request.
    2. All correspondence received by us from you (written or electronic inquiries) is classified as restricted-access information and may not be disclosed without your written consent. The personal data and other information about you may not be used without your consent for any purpose other than for response to the inquiry, except as expressly provided by law.
    3. The e-mail address of our DPO is [dpo@virtus.pro](mailto:dpo@virtus.pro).

Only the English version of this document is legally binding. Any translations of this document into other languages are provided for your convenience only.