

Privacy Policy

1. Data Controller

Data controller of your personal data is G2A.COM Limited with its registered office at 31/F, Tower Two, Times Square, 1 Matheson Street, Causeway Bay, Hongkong, <https://www.g2a.co/contact/> (being “G2A.COM”, “we”, “us”) under the Personal Data (Privacy) Ordinance (Cap. 486) (“PDPO”) and under the General Data Protection Regulation (“GDPR”).

2. Purposes and legal bases for processing

From time to time we may collect your personal data including but not limited to your name, mailing address, telephone number, email address, date of birth, IP, login name, payment instrument and transaction details and unique identifiers assigned to you for the following purposes:

Purpose	Legal basis for processing
To provide you with our products and services and administer your account in relation to such products and services, in particular to process your transaction, subscriptions and registration for our products and services – in accordance with your agreements with us	Entering into and performing a contract
To detect, investigate and prevent fraud, to maintain the security of our systems, to protect our property and safety as well as property and safety of our employees	Legitimate interests
To conduct research and statistical analysis in order to improve and develop our business, products and services	Legitimate interests
To provide you marketing information about our Group products and services as well as relevant third-party products and services:	Consent
<ul style="list-style-type: none">• by using direct marketing;	Consent
<ul style="list-style-type: none">• by adapting our websites, offers and advertising to your interests;	Consent
To comply with applicable EU laws and regulations, in particular regulatory and anti-money laundering obligations	Compliance with a legal obligation
To comply with applicable non-EU laws and regulations, in particular regulatory and anti-money laundering obligations	Legitimate interests

3. Direct Marketing

Where you have given your consent and have not subsequently opted out, we may also use your name, mailing address, telephone number and email address to send promotional materials to you and conduct direct marketing activities in relation to G2A.COM products and services, and products services offered by other members of the Group, or products and services offered by relevant third-parties.

If you do not wish to receive any promotional and direct marketing materials or do not wish to receive specific types of promotional and direct marketing materials or do not wish to receive such materials through a specific means of communication, you can unsubscribe or change your settings by clicking the link provided in the marketing materials you receive. You can also unsubscribe here [link] or contact us through one of the communication channels set out in the "Contact Us" section below.

Where you have given your consent and have not subsequently opted out, we may also collect information about what is watched and bought by you, at what price, in what amount or whether did you add specific products to the cart but did not buy them and use it to create a profile of your interests on the basis of content that we think was interesting for you (for example because you added it to the cart) as well as content that other users similar to you have found engaging. By using [this profile of your interests we can adapt our marketing materials by replacing the default content with content more relevant to your interests (for example we can show you games or other products that we think you might like instead of the default offers).

4. Recipients of the personal data

We may transfer your personal data to the following categories of recipients:

- other users of our products and services where this is necessary to perform our agreements with you, for example when you purchase a game from a seller on the G2A Marketplace or transfer funds to the G2A Wallet of another user;
- other members of the Group;
- agents, contractors, advisors or third parties who provide administrative, telecommunications, computer, payment, debt collection, data processing, legal or other services to G2A.COM;
- financial institutions, payment service providers (such as banks, payment institutions or electronic money institutions) as well as card organizations (such as VISA or MasterCard) – in connection with our payment services;
- persons and institutions that are allowed to request your personal data under applicable laws and regulations through a court order, subpoena or other legal process, such as supervisory bodies, regulators or law enforcement bodies;
- other parties as notified to you at the time of collection.

G2A operates internationally. If personal data is transferred from European Union outside European Economic Area, we make sure that adequate level of personal data protection is assured, for example by signing standard contractual clauses for transfer of data.

6. Retention of data

We will retain your personal data for as long as we have lawful grounds to do so.

- personal data required to provide services, for the time of providing such services and after that, for the time required by legal provisions (e.g. on accountancy) or to handle possible claims
- personal data that must have been collected for anti-money laundering legislation requirements, including for identification, screening and reporting, as a rule for 5 years after the termination of our relationship, unless we are required to retain this information for the purposes of court or administrative proceedings, or 8 years to handle possible claims
- personal data processed on the basis of your consent, as a rule until such consent is withdrawn
- personal data processed on the basis of a legitimate interest.

6. Your rights

Under the PDPO, you have the right to verify whether we hold your personal data, to obtain a copy of the data, and to correct any data that is inaccurate. You may also request us to inform you of the type of personal data held by us. All data access requests shall be made using the form prescribed by the Privacy Commissioner for Personal Data ("Privacy Commissioner") which may be found on the official website of the Office of the Privacy Commissioner or via this link: <https://www.pcpd.org.hk/english/publications/files/Dforme.pdf>

Pursuant to the GDPR you also have the following rights:

- Right to be informed.
- Right to erasure.
- Right to restriction on processing.
- Right to portability.
- Right to lodge a complaint with a supervisory authority.

If you have any request or questions about this Privacy Policy or how we use your personal data, please contact us iod@g2a.com.