

# Privacy & Cookie Policy

LuckyCrush

## □ What's the privacy policy for?

At LuckyCrush, protecting your personal data is a priority!

The purpose of this privacy policy is to provide you with information about the way we process your personal data.

You can rest assured that when collecting and managing your data, we are fully compliant with the (good old) "Informatique et Libertés" law of 1978 (the French data protection act) and also with the (very popular) European data protection regulation of 27 April 2016 (hereafter referred to as the "**GDPR**").

## What is personal data?

During your use of our website (hereafter referred to as the "**Site**"), which is accessible online at the address [www.luckycrush.live](http://www.luckycrush.live), we may ask you to provide us with personal data concerning you in order to use our services (hereafter referred to as the "**Services**").

The term "**personal data**" refers to all data making it possible to identify you as an individual.

## □ Which personal data is collected by LuckyCrush?

During our activities and via the Services which we propose, we may gather a certain amount of information concerning you, including your gender, e-mail address, username, country of residence, photos, phone number, IP address, chat messages, video chat screenshots, last name, first name, address, data concerning your transactions on the Site (payments and payouts - payment information is only collected by our payment processors), billing information (to generate your invoice when you request a payout), company registration number, currency and copy of your identity card. We also would like to inform our users that we use FingerPrintJS to track users' source and activity on the site. This allows us to optimize our advertising activity. You can find everything about the FingerPrintJS' privacy policy here: <https://dev.fingerprintjs.com/docs/privacy-policy>

These data may be collected when you use our Site or when you use our Services.

We remind you that you have to be 18 or over to use our Services.

## □ Who is the data controller?

Hello World SAS, a simplified joint-stock company, registered in the Trades & Companies Register of Paris under the n° 838 199 917, having its registered office at 128 rue de la Boétie, 75008 Paris.





E-mail address: [hello@luckycrush.live](mailto:hello@luckycrush.live)

Phone number: +33753904021



## 1. The use of your personal data

### On which bases are your data collected and used?

 <b>Contract</b>	 <b>Legitimate Interest</b>	 <b>Legal Obligation</b>	 <b>Consent</b>
This collection is necessary to implement the contract concluded when you use our Services on our Site.	When you voluntarily provide us with personal data, we collect it in order to better meet your requests for information on our Site.	When the processing of your data is necessary to comply with the legal obligations to which we are subject.	This involves the collection and storage of your personal data via cookies used on our Site or the sending of information and prospection material.

### For which end purpose(s) are your data collected and used?

			
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Managing your access to our Services accessible via the Site and their use.	The preparation of business statistics and those concerning visits to our Site.	Compliance with our legal and regulatory obligations.	For more information on Cookies, please read our attached Cookies Policy.
Creating a database of users, registered members and prospects.	Personalising replies to your requests for information.	In order to detect fraud and use of our Services that would appear to be contrary to our terms and conditions or/and illegal.	
	Sending information or prospection material.		

**NB/** Any data we request on the site is necessary for the operation of the feature you are trying to use when we ask for this data. We do not ask for any personal data that we deem unnecessary in order to limit the amount of personal information you have to provide to us. If you do not wish to provide this personal information, you are free not to use the feature that requires this data. In general, you alone decide whether or not to provide us with the required information.

## 2. Recipients of the collected data

The following will have access to your personal data:

- (i) Our team,
- (ii) The services handling inspection activities (including the auditors of corporate accounts),
- (iii) Our processors and external services, and in particular (non exhaustive list):
  - SecurionPay (payment processing)
  - CardBilling (payment processing)
  - Any other payment processor you may see on the payment page.
  - Google Analytics (Analytics)
  - Any digital product and marketing analytics tool you may see in the cookies
  - AWS (Servers and hosting)
  - Google (Advertising and analytics)
  - MongoDB (Database)
  - Vonage (Video chat)
  - PostAffiliate Pro (Affiliate links)
  - IPQualityScore (Email and IP address verification)
  - Twilio (2FA SMS)

Not forgetting the (much less fun) public authorities, legal officers (bailiffs, notaries, etc.), ministerial officers and debt collection organisations.

**Your personal data will never be transferred to, leased to or exchanged with third parties.**

## 3. Personal data retention period

□ **User's data:**

The data is stored for the whole length of your registration to our Services and for a period of:

- Three (3) years from your unsubscription date concerning the use of the data for prospection purposes. At the end of this three (3) year period, we may contact you again to find out if you wish to continue receiving commercial communications from us.
- One (1) year as from the exercise of the right of access or rectification, in the event of exercise of this right, concerning data relating to identity documents.
- A minimum of three (3) years as from the date on which you exercise your right of opposition concerning information making it possible to exercise your rights.
- Five (5) years from your unsubscription date concerning compliance with legal and regulatory obligations and in order to make it possible to establish proof of a right or a contract.
- Thirteen (13) months concerning the cookies mentioned in the article below,
- One (1) year as from the date on the recording concerning the use of screenshots of videos and chat messages recorded randomly, only in order to detect fraud and use of our Services that would appear to be contrary to our terms and conditions or/and illegal.

#### **□ Credit card data:**

No worries, your bank details are safe with our payment service providers, who ensure the proper functioning of your purchases and fees on our Site.

In order to be able to carry out your transactions, our payment service providers collect and store personal data relating to your credit card in our name and on our behalf. We do not have access to these data.

The data relating to your credit card are kept for the duration of the commercial transaction, and for the following purposes:

- for the entire duration of your registration on our Site only if you allowed the storage of your bank details in order to facilitate your subsequent purchases by ticking the dedicated box at the time of payment of your purchase.
- Thirteen (13) months following the debit date or fifteen (15) months following the debit date to take into account the possibility of using deferred debit payment cards, for the purposes of proof in the event that the transaction is disputed, in intermediate archives.

The data relating to the visual cryptogram or CVV2, written on your credit card, are not stored.

The names of the payment processors and a maximum of their contact information are available on the payment page. You can contact them at any time if you have any questions or requests.

## **4. Security**

No worries here! We (and our processors) have taken all necessary precautions in addition to the appropriate organisational and technical measures to protect the security, integrity and privacy of your personal data.

## **5. Hosting**

Your data are kept and stored for the whole duration of its processing, on the servers of the company Amazon Web Services (AWS) and Google located in the European Union.

## **6. Transfer outside the European union**

Regarding the tools we use (see article 2 on recipients of the collected data, concerning our processors), your personal data may be transferred outside the European Union. The transfer of your data within this framework is secured by the following safeguards:

- Either these companies have adhered to the "Privacy Shield", which has been deemed to offer an adequate level of protection by the European Commission decision dated 12 July 2016 (please see the [adequacy decision](#)). To learn more about the protection offered by the Privacy Shield, you can consult its [website](#);
- Either we have concluded a specific contract governing the transfer of your data outside the European Union with them, based on the standard contractual clauses between a data controller and a processor approved by the European Commission.

## **7. Cookies**

For more information on Cookies, please read our attached Cookies Policy.

## 8. Your rights

### What are your rights concerning your data?



#### Right to information

This is precisely why we drafted this privacy policy



#### Right of access

You have the right to access all of your personal data at any time



#### Right to rectification

You have the right to rectify any of your personal data which is inaccurate, incomplete or outdated at any time



#### Right to limitation

You have the right to demand that the processing of your personal data be restricted in certain cases described in art.18 of the GDPR



#### Right to data portability

You have the right to receive your personal data in a readable format and to demand its transfer to the recipient of your choice



#### Right to be forgotten

You have the right to demand that your personal data be deleted and to prohibit any future collection



#### Right to submit a complaint

You have the right to contact the relevant supervisory authority (the CNIL in France), if you feel that the processing of your personal data violates one of the applicable laws or regulations



#### Right to object

You have the right to oppose the processing of your personal data. However, please note that we may continue to process it despite this opposition, on legitimate grounds or to defend our rights before the courts.

Regarding prospecting, you may oppose this at any time via the unsubscribe link located at the bottom of each of our prospecting emails.



#### Right to leave instructions for after your death

concerning the storage, deletion and communication of your personal data, designating the person responsible for implementing these if necessary.

You may send them to a digital trusted third party certified by the CNIL (French data protection authority) in the case of general instructions, or to the contact details below for your specific instructions. You can modify or revoke your instructions at any time.

You may exercise the above-mentioned rights by writing to us at [hello@luckycrush.live](mailto:hello@luckycrush.live)

or the following address for those who prefer to contact us by post: Hello World SAS, 128 rue de la Boétie, 75008 Paris, France.

You should be able to prove your identity by any means. If we have any doubt regarding your identity, we could ask you to provide us with additional necessary information such as a copy of a signed identity document.

## **9. Applicability date**

This privacy policy takes effect on 10 January 2021.

## **10. Modifications**

We reserve the right to partially or wholly modify this privacy policy at any time at our sole discretion.

These modifications will take effect as from the publication date of the new privacy policy. Your use of the Site once these modifications have taken effect constitutes your acknowledgement and acceptance of the new privacy policy. Failing this, if this new privacy policy is unacceptable to you, you must no longer access our Site.

## **11. Credits**

Credits for the pictograms: designed by Gregor Cresnar, Thomas Soto, Iyikon, Bezier Master, Alina Oleynik, Jaro Sigrist, Three Six Five, Rflor, Rama, AomAm, Por Suppasit, and Pedro Santos from Noun Project.

## **Appendix – Cookies policy**

### **1. What is a Cookie?**

When browsing our Site, cookies, pixels, tags and other trackers (hereafter referred to as the “**Cookies**”) are installed on your computer.

A cookie is a small file, often encrypted, that is stored in your browser or device and is identified by a name. It is installed when you visit a site or application. Each time you return to the said site or application, the Cookie is retrieved from your browser or device. This ensures that each time you visit the site or application, the browser is recognized.

The installation of these Cookies is likely to enable us to access your browsing data and/or personal data concerning you.

### **2. Your Cookies preferences**

#### **□ Cookies that can be installed without consent**

Some cookies do not require your consent, such as:

- Technical or functional Cookies that are necessary for the operation of the Site;
- Certain Cookies for audience measurement or Cookies that enable to test different versions of the Site for the purpose of optimising editorial choices.

#### **□ Acceptance or refusal of Cookies subject to your express consent**

All other Cookies require your consent. These include Advertising Cookies, Social Networking Cookies, Content Personalization Cookies and some Audience Analysis Cookies. You may freely choose to accept or decline the use of these Cookies.

You can accept or refuse these Cookies the first time you browse the Site.

You are free to withdraw your consent and more generally to change your preferences at any time in your browser settings. Note that the site reserves the right to block the access to the whole site or some features if you block some necessary cookies. Note that you can find a list of all the cookies used on the site in your browser settings.

#### **□ Your browser settings**

It is possible to set your browser to accept or reject certain Cookies.

Each browser offers different settings:

- For Internet Explorer: go to the "Settings" menu, then "Internet Option". Click on "Privacy" and then "Advanced Privacy Settings";



- For Chrome: go to the “Settings” menu, then click on “Confidentiality and Security”. Finally, click on “Authorisation” and “Cookies and website data”;
- For Safari: go to the application “Settings”, then go to “Safari”. Click on “Confidentiality and Security”. You can now choose to block all Cookies;
- For Iphone: go to the “Settings” menu, then “Safari”, click on “Cookies”. You can now choose to block all Cookies;
- For Android: go to “Chrome”, click on the tag “ ” at the top right of the screen, then on “Site settings” and finally on “Cookies”. You can now choose to accept or block all Cookies.

Here are a few additional resources to learn how to see cookies used by a website and how to delete them:

- <https://www.wikihow.com/View-Cookies>
- <https://www.webtoffee.com/how-to-identify-cookies-your-website-installs-on-the-browser/>
- <https://www.cookieserve.com/>

#### Appendix - List of the cookies we use

##### luckycrush.live Cookies overview

##### *User Authentication tokens:*

- uhidB
- vtk
- ftk
- utk

##### *User tracking:*

- Google analytics cookies

##### *'In house' (all are First-Party):*

- referer
- request\_url
- aid
- bid
- cid
- aff\_id
- maid
- mbid
- mcid

##### *PostAffiliate Pro*

- PAPVisitorId

#### *Others*

- lang : selected user language
- adult-confirmed : age confirmation popup

IMPORTANT: all of the cookies are First-Party cookies except those from Google Analytics