



## PRIVACY POLICY / GDPR

Version: April 20, 2023

This privacy notice for Destiny ('Company' 'we', 'us', or 'our'), describes how and why we might collect, store, use, and/or share ('process') your information when you use our services ('Services'), such as when you:

1. Visit our website at [www.vadestiny.com](http://www.vadestiny.com), or any website of ours that links to this privacy notice.
2. Engage with us in other related ways, including any sales, marketing, or events.

**Questions or concerns?** Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at [privacy@vadestiny.com](mailto:privacy@vadestiny.com).

## SUMMARY OF KEY POINTS

**What personal information do we process?** When you visit, use, or navigate our Services, we may process personal information depending on how you interact with Destiny and the Services, the choices you make, and the products and features you use. Learn more about personal information you disclose to us below.

**Do we process any sensitive personal information?** We do not process sensitive personal information.

**Do we receive any information from third parties?** We do not receive any information from third parties.

**How do we process your information?** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about how we process your information below.

**In what situations and with which parties do we share personal information?** We may share information in specific situations and with specific third parties. Learn more about when and with whom we share your personal information below.

**How do we keep your information safe?** We have organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe below.

**What are your rights?** Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more about your privacy rights below.

**How do you exercise your rights?** The easiest way to exercise your rights is by visiting [www.vadestiny.com/contact](http://www.vadestiny.com/contact), or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws. Want to learn more about what Destiny does with any information we collect? Review the privacy notice in full.





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## 1. WHAT INFORMATION DO WE COLLECT?

### PERSONAL INFORMATION YOU DISCLOSE TO US

*In Short:* We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you [contact us](#).

**Personal Information Provided by You.** The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

1. names
2. phone numbers
3. email addresses
4. usernames
5. contact preferences
6. contact or authentication data
7. mailing addresses
8. billing addresses

**Sensitive Information.** We do not process sensitive information.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

### INFORMATION AUTOMATICALLY COLLECTED

*In Short:* Some information - such as your Internet Protocol (IP) address and/or browser and device characteristics - is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services.

This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

1. *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this



[www.VADestiny.com](http://www.VADestiny.com)



[hello@VADestiny.com](mailto:hello@VADestiny.com)

log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).

2. *Device Data.* We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
3. *Location Data.* We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

## 2. HOW DO WE PROCESS YOUR INFORMATION?

*In Short:* We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

**WE PROCESS YOUR PERSONAL INFORMATION FOR A VARIETY OF REASONS, DEPENDING ON HOW YOU INTERACT WITH OUR SERVICES, INCLUDING:**

1. **To facilitate account creation and authentication and otherwise manage user accounts.** We may process your information so you can create and log in to your account, as well as keep your account in working order.
2. **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.
3. **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
4. **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
5. **To fulfil and manage your orders.** We may process your information to fulfil and manage your orders, payments, returns, and exchanges made through the Services.
6. **To enable user-to-user communications.** We may process your information if you choose to use any of our offerings that allow for communication with another user.
7. **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.
8. **To send you marketing and promotional communications.** We may process the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time. For more information, see 'WHAT ARE YOUR PRIVACY RIGHTS?' below).
9. **To deliver targeted advertising to you.** We may process your information to develop and display personalised content and advertising tailored to your interests, location, and more.
10. **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
11. **To determine the effectiveness of our marketing and promotional campaigns.** We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.



12. **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

### 3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

*In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.*

The General Data Protection Regulation (GDPR and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

1. **Consent.** We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
2. **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
3. **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
  1. Send users information about special offers and discounts on our products and services.
  2. Develop and display personalised and relevant advertising content for our users.
  3. Support our marketing activities.
  4. Diagnose problems and/or prevent fraudulent activities.
  5. Understand how our users use our products and services so we can improve user experience.
4. **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
5. **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

### 4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

*In Short: We may share information in specific situations described in this section and/or with the following third parties.*

We may need to share your personal information in the following situations:

1. **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

### 5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

*In Short: We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our [Cookie Policy](#).



## 6. HOW LONG DO WE KEEP YOUR INFORMATION?

***In Short:** We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than twelve (12) months past the start of the idle period of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 7. HOW DO WE KEEP YOUR INFORMATION SAFE?

***In Short:** We aim to protect your personal information through a system of organisational and technical security measures.*

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

## 8. DO WE COLLECT INFORMATION FROM MINORS?

***In Short:** We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at [privacy@vadestiny.com](mailto:privacy@vadestiny.com).

## 9. WHAT ARE YOUR PRIVACY RIGHTS?

***In Short:** In some regions, such as the European Economic Area (EEA) and United Kingdom (UK), you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

In some regions (like the EA and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below. We will consider and act upon any request in accordance with applicable data protection laws.





If you are located in the EA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your [Member State data protection authority](#) or [UK data protection authority](#).

If you are located in Switzerland, you may contact the [Federal Data Protection and Information Commissioner](#).

**Withdrawing your consent:** If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

**Opting out of marketing and promotional communications:** You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, or by contacting us using the details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below. You will then be removed from the marketing lists. However, we may still communicate with you - for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

## ACCOUNT INFORMATION

If you would at any time like to review or change the information in your account or terminate your account, you can:

1. Log in to your account settings and update your user account.
2. [Contact us](#) using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. You may also [opt out of interest-based advertising by advertisers](#) on our Services. If you have questions or comments about your privacy rights, you may email us at [privacy@vadestiny.com](mailto:privacy@vadestiny.com).

## 10. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## 11. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

*In Short:* Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.





California Civil Code Section 1798.83, also known as the 'Shine The Light' law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.)

## 12. DO WE MAKE UPDATES TO THIS NOTICE?

*In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this privacy notice from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## 13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO), Thomas Sterba, by email at [privacy@vadestiny.com](mailto:privacy@vadestiny.com).

## 14. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

You have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please visit: [www.vadestiny.com/contact](http://www.vadestiny.com/contact).

