

**Privacy and Cookie Policy
of the Website rabato.com**

General provisions

1. The Privacy Policy defines the rules for the processing of personal data collected through the website available at rabato.com (hereinafter: the “**Website**”).
2. The owner of the Website and the data controller is Curious Limited with its registered office in Gibraltar, address: Suite 4, 4 Giro’s Passage, GX11 1AA, Gibraltar, entered in the relevant register under the number GICO.113940-94 (hereinafter: the “**Controller**”).
3. In the matters concerning personal data, the Controller may be contacted as follows:
 - a. by email at: rabato.ads@gmail.com;
 - b. by traditional mail sent to the Controller’s registered address indicated in item 2 above.
4. The Controller shall process personal data collected through the Website in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.04.2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), hereinafter the “**GDPR**”.
5. The capitalised words shall have the meaning assigned to them in the terms and conditions of this Website.
6. The Services available on the Website are not addressed to persons below the age of 16. The Controller of personal data does not envisage deliberate collection of data concerning persons below the age of 16.
7. The Controller shall make every effort to protect the privacy and information available to it, concerning the Website Users. The Controller shall exercise due care in the selection and application of the technical measures, including programming and organisational measures, which ensure protection of the data processed, in particular it shall safeguard the data from unauthorised access, disclosure, loss and destruction, unauthorised modification, and also from their processing in breach of the legislation in force.
8. The Controller processes the following categories of personal data:
 - a. data on the activity on the Website;
 - b. data on complaints, claims and requests;
 - c. data on marketing services.
9. Provision of personal data by the User is voluntary, but it may be a condition for the supply of Services by the Controller through the Website.
10. The Controller may amend the Privacy Policy. The Users shall be notified about any amendment to the privacy policy at least 14 days in advance by a message on the Website.

The purposes and legal grounds for the processing of personal data

1. Personal data of the Users are collected for the newsletter subscription and for the performance of the agreement concerning an electronically supplied service (Article 6(1)(a) of the GDPR).
2. The User shall provide the following data: email address, name.
3. Additionally, when using the Website, the collected information may include: IP address assigned to the User’s computer or an external IP address of the Internet provider, domain name, browser type, time of access, operating system type, or ID address.
4. Navigation data may also be collected from the Users, among others, information on the activities undertaken on the Website, including links and references they used (Article 6(1)(f) of the GDPR).
5. For the establishment, exercise or defence of legal claims, and for the defence against legal claims in proceedings before court and other enforcement authorities, we may process data necessary to prove the existence of the claim or as provided for in legal requirements, court order or other legal procedure (Article 6(1)(f) of the GDPR).

6. For the handling of complaints, claims and requests and answering questions of the Users, we may process the personal data provided by the User in complaints, claims and requests, or in order to provide the answer to questions contained in another form, and also the data pertaining to the provided Services being the grounds for the complaint, claim or request, and the data contained in the documents attached to the complaints, claims and requests (Article 6(1)(f) of the GDPR).
7. For the marketing of the Services of the Controller and partner services, including remarketing, we may process the personal data provided by the User when subscribing for a newsletter, data pertaining to activities of the User on the Website, including the activities which are registered and stored through cookies, and in particular activity history, search history, clicks on the Website, history and your activity related to our communication with you. In the case of remarketing, we may use the data on the User's activity in order to reach them with the marketing messages outside the Website. For that purpose, the Service Provider may also use the services of third party service providers. Such Services involve displaying of the Service Provider's messages on the websites other than the Website. To learn more, please refer to the provisions concerning cookies.

Recipients of personal data

1. Personal data of the User are transferred to the service providers engaged by the Controller for operating the Website. Depending on the contractual arrangements and the circumstances, such entities have the status of processors or controllers.
2. Processors include, among others, providers of the hosting service, accounting services, marketing systems, traffic analysis systems for the Website, systems to analyse effectiveness of the marketing campaigns. A detailed list of providers may be found at: <http://www.youronlinechoices.com>.
3. The service providers referred to in item above operate at the direction of the Controller or determine the purposes and ways of processing of personal data by themselves.
4. The Controller shall disclose personal data to competent public authorities if it receives a relevant request.

Personal data processing period

1. Personal data of the Users processed on the basis of the consent of the User are stored by the Controller until the consent is revoked, and after it is revoked - for a period corresponding to the limitation period of claims which the Controller may pursue and which may be pursued against the Controller. As a general rule, limitation periods of claims are 6 years, and for claims related to business activity such periods are 3 years, unless a specific stipulation provides otherwise.
2. Navigation data may be used for an improved User experience, for the analysis of statistical data and for adaptation of the Website to the preferences of the Users, and also for administration of the Website.
3. The data are stored for the period corresponding to the lifecycle of the cookies saved on the devices or until they are deleted from the User's device by the User.
4. Personal data concerning preferences, behaviours and selection of marketing content may be used as a basis for automated decision making in order to determine the sales capabilities of the Website.

The rights of the data subject

1. The User may withdraw any consent they have given to the Controller (Article 7(3) of the GDPR). Withdrawal of consent shall take effect from the time it is made and shall not affect the processing of data by the Controller before its withdrawal. Withdrawal of consent shall not entail any negative consequences for the User. The User may lose access to the services or functionalities of the Website which may be provided by the Controller only on the basis of the User's consent.

2. The User may, at any time, object – on grounds relating to their particular situation - to the processing of their personal data, including profiling (Article 21 of the GDPR).
3. If the User unsubscribes from the newsletter by email, this shall be equivalent to their objection to the processing of their personal data performed for the purposes of performance of this Service.
4. If the objection is reasonable, the User’s personal data referred to in the objection shall be erased, unless the Controller is required to process them on another legal basis.
5. The User has the right to request erasure of all or some of the personal data - the so-called “right to be forgotten” - (Article 17 of the GDPR) where one of the following grounds applies:
 - a. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - b. the User withdraws consent on which the processing is based;
 - c. the User objects to the use of their data for marketing purposes;
 - d. personal data have been unlawfully processed;
 - e. personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Controller is subject;
 - f. personal data have been collected in relation to the offer of information society services.
6. Regardless of the submitted requests for erasure of personal data, in connection with the objection or with the withdrawal of consent, the Controller may retain personal data insofar as their processing is necessary for the establishment, exercise or defence of legal claims, and also for compliance with a legal obligation which requires processing under Union or Member State law to which the Controller is subject.
7. The User has the right to request restriction of processing of their personal data (Article 18 of the GDPR). Pending consideration of the request, the User will not be able to use the functionalities or services which require processing of the data covered by the request. In addition, the Controller shall not send any messages to the User.
8. The User has the right to request restriction of the use of personal data where one of the following applies:
 - a. the accuracy of the personal data is contested by the User, for a period enabling the Controller to verify the accuracy of the personal data, not longer than 7 days;
 - b. the processing is unlawful and the User opposes the erasure of the personal data and requests the restriction of their use instead;
 - c. personal data are no longer needed for the purposes for which they have been collected or used, but they are required by the User for the establishment, exercise or defence of legal claims;
 - d. the User has objected to the processing of their data: in this case the restriction shall apply pending the verification whether - on grounds relating to particular situation - the protection of interests, rights and freedoms of the User overrides the interests of the Controller in the processing of personal data of the User.
9. The User has the right to obtain from the controller confirmation as to whether or not personal data concerning them are being processed (Article 15 of the GDPR), and where that is the case, the User has the right:
 - a. to access their personal data;
 - b. obtain information on the purposes of the processing; the categories of personal data concerned; the recipients or categories of recipients to whom the personal data have been or will be disclosed; the envisaged period for which the User’s data will be stored the criteria used to determine that period (where indication of the envisaged period of the processing of data is not possible); the existence of the User’s rights under the GDPR; and the right to lodge a complaint with a supervisory authority; the source of data; automated decision making, including profiling; and safeguards applied in connection with the transfer of such data outside the European Union;
 - c. to obtain a copy of their personal data;

10. The User has the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning them (Article 16 of the GDPR). Taking into account the purposes of the processing, the User who is a data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement, upon sending a request to the Controller's email address.
11. The User has the right receive the personal data concerning they have provided to the Controller, and then to transmit those data to another controller of their choice (Article 20 of the GDPR). The User also has the right to have the personal data transmitted directly from the Controller to another controller, where technically feasible. In this case, the Controller shall transmit the User's personal data in the csv file format, which is a commonly used and machine-readable format allowing to transmit the received data to another controller of personal data.
12. Whenever the User submits any of the requests referred to in the items above, the Controller shall consider them (i.e. accept or reject the User's request) immediately, but not later than within a month after receipt of the request. This period may be extended for a further two months due to the complex nature of the request or the number of requests, whereas the Controller shall inform the User to this effect before lapse of a month after receipt of the request and shall state the reason for such extension.
13. The User may submit complaints, inquiries and requests concerning the processing of their personal data and exercise of their rights.
14. The User has the right to lodge a complaint with a supervisory authority, in particular in the Member State of their habitual residence, of their place of work or of the alleged infringement.
15. Requests for access, amendment, erasure, restriction of processing, lodging of a complaint, as well as requests concerning data portability referred to in this paragraph should be submitted by email, to the address of the Controller: rabato.ads@gmail.com.

Cookies

1. The Website uses the so-called cookies, which are saved by the Controller in the device on which the User uses the Website, where the web browser settings allow. A cookie contains, among others, the name of the domain of its origin, the period of validity and randomly assigned identifying number. The information collected by cookies helps do adapt the Website to the Users' needs and allows to develop aggregate data on the general statistics concerning visiting the Website.
2. The Website uses the following types of cookies:
 - a. session cookies, which are deleted from the User's device after the end of the browser session, do not allow the downloading of any personal data or confidential information from the Users' devices;
 - b. persistent cookies, which are stored in the memory of the User's device until deleted or expired, do not allow the downloading of any personal data or confidential information from the Users' devices.
3. First-party cookies are used by the Controller to create anonymous statistics concerning the ways of using the Website in order to enhance the Website.
4. Third-party cookies are used by the Controller for the following purpose:
 - a. to collect statistical data via analytical tools - Google Analytics, Google Ads, Google AdSense (the administrator for the third-party cookies is Google Ireland Ltd. with its registered office in Ireland; the privacy policy of Google is available at the following links:
 - <https://policies.google.com/privacy>,
 - <https://policies.google.com/technologies/partner-sites>;

5. Web browsers allow the Users to limit or disable cookies' access to devices. Such settings may limit the ability to use the Website in respect of the functions which require cookies.
6. The Controller may collect IP addresses of the Users to create statistical analyses, diagnose technical problems, enhance the Website and ensure safety.
7. Responsibility for maintaining the privacy rules on the websites to which the links and references on the Website lead rests with the operators running them.
8. Using the browser settings or using the service configuration, the User may by themselves and at any time change the settings concerning cookies, specifying the conditions for their storage and access to the User's device. These settings may be changed by the User so as to block the automatic cookie use in the web browser settings or to inform about their saving on the device in each individual instance. Detailed information about cookie use and options is available in the settings of the software (web browser) used by the User.