

Blue Hills Club

Privacy Policy

03.11.2019

1. Data Protection Overview

General Information

Below is a simple overview of what happens to your personal information when you visit our website. Personal information is any data by which you can be identified. Detailed information on data protection can be found in our privacy policy below.

Data Collection on Our Website

Who is responsible for collecting data on this website? The data collected on this website are processed by the website operator. The operator's contact details can be found in the website's mandatory legal notice.

How Do We Collect Your Data?

Some data are collected when you provide them to us. These can be, for example, the data that you enter in a contact form. Other data are collected automatically by our IT systems when you visit the website. These data are mainly technical data such as the browser and operating system that you use or when you visited the page. These data are collected automatically as soon as you visit our website.

What Do We Use Your Data for?

Part of the data is collected to ensure the proper functioning of the website. Other data may be used to analyse how visitors use the website.

What Rights Do You Have in Relation to Your Data?

You always have the right to request information about your saved data, their origin, recipients and the purpose of their collection, free of charge. You also have the right to request rectification, blocking or deletion. You can contact us at any time using the address provided in the legal notice if you have additional questions on privacy and data protection issues. You can also, of course, file a complaint with competent regulatory authorities.

Analytics and External Tools

When you visit our website, a statistical analysis of your online behaviour may be conducted. This mainly happens by using cookies and analytics. The analysis of your online behaviour is usually anonymous, i.e. we cannot identify you by these data. You can object to this analysis or prevent it by not using certain tools. Details can be found in the following privacy policy. You can object to this analysis. Below we will tell you how to use your options in this respect.

2. General Information and Mandatory Information

Data Protection

The operators of this website take the protection of your personal data very seriously. We treat your personal data as confidential and in accordance with the statutory data protection regulations and this privacy policy.

If you use this website, a variety of personal data will be collected. Personal information shall mean any data by which you can be identified. This privacy policy explains what information we collect and what we use it for. It also explains how and for what purpose this happens.

Please note that data transmitted over the Internet (for example, by e-mail) may have security breaches. Complete protection of your data from access by third parties is impossible.

Notice of the Party Responsible for This Site

The party responsible for the data processing on this website is:

Address: 31 Isis St Earlsfield, London, United Kingdom

E-mail: support@bluehills.club

The responsible party shall mean a natural person or legal entity who/which alone or jointly with others decides on the purposes and methods of processing personal data (names, e-mail addresses, etc.).

Revocation of Your Consent to the Processing of Your Data

Many data processing operations are only possible upon your explicit consent. You can revoke your consent at any time with future effect. An informal e-mail with this request is sufficient. The data processed before we receive your request may still be legally processed.

Right to File Complaints with Controlling Authorities

If there has been a violation of data protection legislation, the affected person can file a complaint with competent regulatory authorities. The competent regulatory authority for matters relating to data protection legislation is the European Union Data Protection Officer.

Right to Data Transferability

You have the right to have the data we process on the basis of your consent or pursuant to a contract be automatically delivered to you or to a third party in a standard machine-readable format. If you require a direct transfer of data to another responsible party, this will only be done to the extent technically possible.

SSL Encryption

This website uses SSL encryption for security reasons and to protect the transmission of sensitive content such as requests which you send to us as the website operator. You can discern an encrypted connection in the browser address bar when it changes from "http: //" to "https: //" and a lock icon is displayed in the browser address bar.

If SSL encryption is activated, the data you transmit to us cannot be read by third parties.

Encrypted Payments on This Website

If you enter into a contract which requires that you should send us your payment information (for example, a direct debit account number), we will need these data to process your payment.

Payment transactions are only conducted through SSL encrypted connections. You can discern an encrypted connection in the browser address bar when it changes from "http: //" to "https: //" and a lock icon is visible in the browser bar.

In the case of encrypted communication, any payment details you send to us cannot be read by third parties.

Countering Advertising E-mails

We hereby expressly prohibit the use of contact details published in the context of the website's legal notice requirements in relation to sending advertising and information materials not explicitly requested. The website operator reserves the right to take specific legal actions in the event of receiving undesirable advertising materials such as e-mail spam.

3. Data Protection Officer

Data Protection Officer

We have appointed a data protection officer in our company.

Address

E-mail: mary.w@bluehills.club

4. Basic Provisions

This Policy describes the general principles of Personal Data processing at 'bluehills.club'. Specific details of Personal Data processing may also be included into agreements entered into or to be concluded between the Client and 'bluehills.club' and are presented at 'bluehills.club'.

'bluehills.club' ensures the confidentiality of Personal Data under the current legislation and has implemented appropriate technical and organisational measures to protect Personal Data from unauthorised access, illegal processing or disclosure, accidental loss, alteration or destruction.

'bluehills.club' may use authorised processors for Personal Data Processing. In such cases, 'bluehills.club' takes necessary steps to ensure that such data processors process Personal Data in accordance with instructions given by 'bluehills.club' and in accordance with applicable legislation and demands adequate security measures.

5. Data Collection on Our Website

Some of our web pages use cookies. Cookies do not harm your computer and do not contain viruses. Cookies help make our website more user-friendly, efficient and safe. Cookies are small text files which are stored on your computer and saved in your browser.

Most of the cookies we use are so-called "session cookies". They are automatically deleted after your visit. Other cookies remain in the memory of your device until you delete them. These cookies enable your browser to be recognised the next time you visit the website.

You can set your browser to inform you about the use of cookies so that you can decide, on a case-by-case basis, whether to accept or reject cookies. Alternatively, your browser can be set to automatically accept cookies under certain conditions or to reject them permanently, or to automatically delete cookies when you close your browser. Disabling cookies may limit the functionality of this website.

The cookies that are necessary to enable electronic communication or to provide certain functions that you want to use (such as shopping carts) are stored in accordance with Article 6 Paragraph 1 Letter f of DSGVO. The website operator has a legitimate interest in the storage of cookies in order to provide an optimised service without technical errors. If other cookies (for example, those used to analyse your online behaviour) are also stored, they will be treated separately in this privacy policy.

Server Log Files

The website provider automatically collects and saves information which your browser automatically transmits to us in "server log files":

Browser type and browser version

Operating system used

URL

Hostname of the connecting computer

Request time

Server IP address

These data will not be combined with data from other sources.

Personal data can be obtained from the Client when the Client uses financial services and from external sources such as public and private registries or other third parties.

The categories of personal data that 'bluehills.club' collects and processes primarily, without limitation, are as follows:

Identification data in applications for opening an account, subscriptions or other forms such as name and personal identification code, date of birth, data relating to an identification document (for example, a copy of passport, ID card), personal description and photograph, as well as any other information that you provide to us to prove your right to use our services, including information which you provide when registering to use the Application, downloading or registering the Application, subscribing to any of the 'bluehills.club' services, entering into any transaction in the Application or the website;

Contact details such as telephone number, e-mail address or address of filing an application for certain products, residential address (if applicable), language of communication;

Data on relations with legal entities, such as data provided by the Client or obtained from public registries or through a third party to conduct transactions on behalf of the respective legal entity, legal representatives (acting with appropriate permission or on any other basis), counteragents and parties to the contract, sources of funds, ultimate beneficial owners (UBO), the general manager of the company; a shareholder; a member of the board or other management body;

Data about habits, preferences and satisfaction, such as activity of using services, services used, personal settings, survey responses, lifestyle, hobbies, clients' satisfaction;

Data obtained and/or created during the fulfilment of an obligation arising from law, for example, data obtained as a result of inquiries made by investigating authorities, notaries, tax administrators, courts and bailiffs, information about income, credit obligations, ownership of property and debt balances;

Data on the origin of assets, such as data on the Client's partners to the transaction and business activities;

Data relating to services, such as performance or non-performance of agreements, transactions conducted, use of ATMs, concluded and expired agreements, applications submitted, requests and complaints, interests and fees for services;

Data on participation in games and campaigns, such as points scored, prizes won in games or campaigns;

Family data, such as information about the Client's family, heirs and other related persons;

Professional data such as education or professional career;

Financial data such as accounts, property, transactions, credits, income and liabilities (if applicable);

Depending on the 'bluehills.club' product selected by the Client, data that enables 'bluehills.club' to carry out due diligence measures in respect to the prevention of money laundering and financing of terrorism and to ensure compliance with international sanctions, including the purposes of the business relations and whether the Client is a politically exposed person;

Depending on the 'bluehills.club' product selected by the Client, data on the Client's tax residency, such as country of residence, taxpayer's identification number, citizenship;

Communication data are collected when the Client communicates with 'bluehills.club' by phone, visual and/or audio recordings, e-mail, messages and other communication channels, such as social media, data relating to the Client's visit to 'bluehills.club' or communication through other channels of information (for example, chat);

Location data are processed in an electronic communication network or by using electronic communication services, indicating the location of the terminal equipment of electronic communication, including the location of the terminal equipment (address), the address of the connection point, GPS, Wi-Fi, etc.

'bluehills.club' may collect and store information (including personal information) locally on the Client's device using such mechanisms as browser web storage and application data caches.

'bluehills.club' may use various technologies to collect and store information when the Client visits 'bluehills.club' and this may include the use of cookies or similar technologies to identify the Client's browser or device.

6. Goals of and Grounds for Personal Data Processing

'bluehills.club' processes Personal Data only for specific and necessary purposes on specific legal grounds, including the legitimate interests of 'bluehills.club'.

'bluehills.club' processes Personal Data primarily:

to manage relations with clients in general, as well as to provide and administer access to financial services offered by 'bluehills.club';

to provide services and perform concluded contracts (transactions). Processing is executed on the basis of law and agreement (transaction);

to assess creditworthiness and risks;

to notify the Client about changes in services;

to manage the web pages and the Application of 'bluehills.club' for internal operations including troubleshooting, data analysis, testing, statistics and research;

to improve the web pages and the Application of 'bluehills.club' so that the content is presented in the most efficient way for you and your computer;

to allow participation in the interactive features of the 'bluehills.club' service when the Client decides to do so;

to measure or understand the efficiency of advertising which 'bluehills.club' provides to the Client and others, and to provide the Client with relevant advertising;

to help 'bluehills.club' better understand the financial circumstances and behaviour of the Client, according to which 'bluehills.club' can take decisions on management of the Client's account;

to protect the interests of the Client and/or 'bluehills.club' and check the quality of services provided by 'bluehills.club', as well as for the purpose of providing evidence of a commercial transaction or other business communication (recorded conversations) based on the performance of an agreement or in order to take steps on the Client's request prior to entering into an agreement or compliance with a legal obligation or the Client's consent or the legitimate interests of 'bluehills.club' in order to prevent, limit and investigate any misuse or illegal use or disruption of financial services or the quality of 'bluehills.club' certification of services, establishment, performance, assignment and defence of legal requirements;

to provide additional services; to conduct client surveys, market analysis and statistics; to offer services to the Client at 'bluehills.club' or carefully selected cooperation partners, including personalised offers upon the Client's consent;

to conduct client surveys, market analysis and statistics; to organise games and campaigns for the Client based on the legitimate interest of 'bluehills.club', to improve services, increase the quality of client service and development of new products and services;

depending on the product, 'bluehills.club' offers legal compliance and identity verification. To comply with applicable law, for example, in relation to the implementation of the principles of responsible crediting, prevention, detection of, investigation into and reporting of possible money laundering, financing of terrorism, if the Client is subject to financial sanctions or is a politically exposed person;

to prevent misuse of financial services and ensure adequate provision of services. To authorize and control access to digital channels and their functioning, to prevent unauthorised access to them and their misuse, as well as to ensure the security of information on the basis of performing the agreement or taking measures on the Client's request before the conclusion of the agreement. To improve technical systems, IT infrastructure, customise the display of a service on the device, and develop payment services 'bluehills.club', for example, by testing and improving technical systems and IT infrastructure;

to conduct transactions within the 'bluehills.club' system and process incoming and outgoing payments.

7. Advertising and Direct Marketing

Advertising and direct marketing communications from 'bluehills.club' (for example, about services and related campaigns of 'bluehills.club') are sent to Clients who have agreed to receive direct marketing and commercial communications from 'bluehills.club'. These clients receive commercial communications and direct marketing communications from 'bluehills.club' through their preferred communications media. 'bluehills.club' may sell its services to existing clients on the basis of legitimate interest.

The client can give his/her consent to receiving commercial communications from 'bluehills.club' by visiting 'bluehills.club' and registering on the website, as well as by signing the questionnaire service.

The client's consent to receiving commercial communications is valid until revoked. Clients have the right, at any time and free of charge, to object to the processing of their Personal Data for direct marketing purposes. To exercise this right, please contact 'bluehills.club'. Clients can also refuse to receive advertising and commercial communications by using the link provided in the e-mail message or by following other instructions provided in this direct marketing message.

8. Grounds for Access to and Use of Personal Data

'bluehills.club' has access to personal data and uses them in the following cases:

the Client intends to conclude or has concluded a contract with 'bluehills.club';

the Client has given his/her consent;

it is possible to process personal data on the basis of legislative acts;

for the purposes of our legitimate interests, such as, for example:

to improve the quality of the 'bluehills.club' services, to ensure our operational consistency and sustainability, the completeness of services, adapting them to the expectations of the Client in order to achieve the maximum Client's satisfaction;

to lodge a claim or defend in any legal action and take other legal actions to avoid or minimise losses;

systematic monitoring and prevention of illegal actions; continuous assessment of respective risks (for example, unauthorised use of payment cards or any other means of payment issued to the Client etc.).

If the Client fails to provide 'bluehills.club' with the personal data necessary to conclude and/or perform the agreement or provisions required by law or in accordance with the agreement, 'bluehills.club' may not be able to provide services to the Client.

9. Providers and Recipients of Personal Data

'bluehills.club' uses the personal data that the Client provides to 'bluehills.club' when the Client seeks services and uses them, when the Client fills in Client information forms, sends requests or lodges claims, and documents of 'bluehills.club' on the website, in the application, by video surveillance, equipment or telephone records as specified above.

Besides, 'bluehills.club' may collect your personal data from other sources, such as:

other financial institutions; Ministry of Finance, Department of Statistics, Board of the State Social Insurance Fund, State Enterprise Register Centre, law enforcement agencies, other registers and institutions; natural persons, when they provide data on their spouses, children, other relatives by blood or marriage, guarantors, borrowers, mortgagees, etc.; documents intended for us and received from natural persons or legal entities during the performance of their contractual obligations before us or obligations arising out of law (information from contracts, reports, etc.);

legal entities in which you are a representative, employee, counteragent, shareholder, member, owner, etc. of the corresponding legal entity;

partners or other legal entities that provide their services with our help.

'bluehills.club' may collect personal information by tracking technology tools and services. Another case is when 'bluehills.club' collects and generates information when the Client provides it to 'bluehills.club', for example, by identifying him/herself or providing a comment by electronic means. Besides, 'bluehills.club' may receive information from suppliers. 'bluehills.club' may combine information received from different sources.

Personal data are transferred to other recipients, for example:

Authorities (e.g. law enforcement agencies, tax authorities, supervisory authorities);

Other banks and financial institutions, payment and other service providers involved in the execution of a transaction to conduct transactions in the system;

Auditors, legal and financial advisors or any other processor authorised by 'bluehills.club';

Third parties that maintain registers (for example, credit bureaus, population registers, business registers or other registers containing Personal Data);

Participants and/or parties associated with domestic, European and international payment systems such as SWIFT;

Collectors upon assignment of claims;

Courts, a non-judicial dispute resolution body and bankruptcy or insolvency administrators;

Other persons associated with the provision of 'bluehills.club' services such as postal service providers, analytics service providers or any other service providers.

10. Newsletters

If you wish to receive our newsletters, we need a valid e-mail address as well as information allowing us to confirm that you are the owner of the specified e-mail address and that you agree to receive these newsletters. No additional data are collected or are only collected on a voluntary basis. We only use these data to send the requested information and do not pass them on to third persons.

You can revoke your consent to the storage of your data and e-mail address and their use for sending the newsletters at any time, for example, by using the "unsubscribe" link in a newsletter. Data processed before we receive your request may still be legally processed.

The data provided when subscribing to the newsletters will be used to distribute the newsletters until you unsubscribe, when the specified data is deleted. The data that we store for other purposes (for example, e-mail addresses for your personal account) remain unchanged.

11. Plugins and Tools

Google Web Fonts

This page uses web fonts provided by Google to consistently represent fonts. When you open the page, your browser loads the required web fonts into the browser cache to display texts and fonts correctly.

To do this, your browser must establish a direct connection to the Google servers. In this way, Google recognises that our website was accessed via your IP address. The use of Google Web Fonts is in the interest of a uniform and attractive presentation of our website. If your browser does not support web fonts, your computer uses a standard font.

Further information on the processing of user data can be found at <https://developers.google.com/fonts/faq> and in Google's privacy policy at <https://www.google.com/policies/privacy/>.

12. Geographic Processing Area

As a rule, Personal Data are processed within the European Union / European Economic Area (EU / EEA).

13. Storage Period

'bluehills.club' stores Personal Data to achieve the goals set out in this Privacy Policy, unless the storage period is specified or permitted by the applicable laws. 'bluehills.club' uses statutory criteria to determine the storage period of data, such as claims handling, protection of rights, problem solving, periods of limitations etc.

The storage period may be based on agreements with the Client, legitimate interests, or the applicable laws (for example, laws relating to the provision of consumer loans, accounting, anti-money laundering, civil law etc.).

14. Providers of Payment Services

Our website accepts payments via the CoinPayments payment system.

Data Security:

Your personal information is safe with us! It is encrypted and transmitted to us via SSL128Bit. Our websites are protected by technical means from damage, destruction, unauthorised access.

To provide information and withdraw funds:

They receive free information about your saved data at any time without explanation. You can always block us to correct the collected or deleted data. You can always give us permission to collect and use data without giving any reason. Apply to support@bluehills.club.

15. Rights of the Client as a Data Subject

The client (data subject) has rights in relation to the processing of his/her data, which in accordance with the applicable laws, are classified as Personal Data. As a rule, there are the following rights:

To demand the correction of his/her Personal Data if they are inadequate, incomplete or incorrect

To object to the processing of your Personal Data if the use of Personal Data is based on a legitimate interest, including profiling for direct marketing purposes (for example, receiving marketing offers or participating in surveys)

To demand the deletion of your Personal Data, for example, those processed on the basis of consent, if he/she has withdrawn the consent. This right does not apply if the Personal Data to be deleted are also processed on other legal grounds, such as the agreement or obligations based on the applicable laws

To restrict the processing of your Personal Data in accordance with the applicable laws, for example, while 'bluehills.club' assesses whether the Client has the right to have his/her data deleted

To receive information whether his/her Personal Data are processed by 'bluehills.club', and if so, to access them

To receive his/her Personal data, which were provided by him/her and which were possible, to transfer these data to another service provider (data transferability)

To withdraw your consent to the processing of your Personal Data

Not to be subject to fully automated decision taking, including profiling, if such a decision has legal consequences or similarly significantly affects the Client. This right does not apply if the decision is necessary to conclude or implement the agreement with the Client, if the decision is allowed in accordance with the applicable laws or if the Client has provided his/her explicit consent

'bluehills.club' makes every effort so that the Client could to exercise his/her rights and to answer all questions that the Client has regarding this Policy and the questions provided herein. The Client may submit a request regarding the exercise of the aforementioned rights, as well as any complaints, notices or inquiries (hereinafter referred to as the "Request") to the data protection officer of 'bluehills.club' by e-mail to support@bluehills.club marked "Data Protection Officer" or at your nearest customer service office.

'bluehills.club' will respond to the Client's Request within no more than thirty (30) calendar days from the date of receipt of the Request. In exceptional circumstances that require additional time, 'bluehills.club', having sent you an appropriate notification, will have the right to extend the period for submitting the requested data or considering the claims set forth in the Request up to sixty (60) calendar days after the date of the Client's Request.

16. Principles of Personal Data Protection

The principles that 'bluehills.club' adheres to during the collection and use of personal data entrusted to 'bluehills.club', as well as personal data obtained from other sources, are as follows:

personal data are processed in a legal, fair and transparent manner (principle of legality, fairness and transparency);

personal data are collected for specific, explicit and legitimate purposes and is not processed further in a manner incompatible with these purposes (principle of limitation of purpose);

personal data are adequate, updated and only those that are required in respect to the purposes for which they are processed (principle of data minimisation);

processed personal data are accurate and, if necessary, are updated (principle of accuracy);

personal data are stored in a form which allows the identification of data subjects for no longer than it is necessary, taking into account the purposes for which the data are processed (principle of limitation of storage);

personal data are processed in such a way that the application of appropriate technical or organisational measures would ensure adequate security of personal data, including protection against unauthorised data processing or illegal data processing, as well as against accidental loss, destruction or damage (principle of integrity and confidentiality).

In the process of collecting and using personal data entrusted to 'bluehills.club', as well as data obtained from other sources, 'bluehills.club' undertakes:

to process personal data only for explicit and lawful purposes;

to refrain from processing personal data for purposes other than those specified in this Policy, unless otherwise provided by the respective legislation;

to process personal data in a lawful, accurate, transparent manner and ensure the accuracy, identity and security of processed personal data;

to ensure that unnecessary personal data are not processed;

to process personal data no longer than it is necessary for the purposes for which personal data are processed;

to bear responsibility for compliance with the principles set out in this Policy, and be able to prove their compliance;

to perform other duties arising out of the laws.

17. Contact Information

Clients can contact 'bluehills.club' with any requests, withdrawal of consent, requests to exercise the rights of data subjects and complaints regarding the use of Personal Data.

Contact details of 'bluehills.club' are available at - '<https://bluehills.club>'.

Contact details of the Designated Data Protection Officer are: support@bluehills.club.

18. Period of Validity of and Amendments to this Privacy Policy

'bluehills.club' has the right to introduce amendments to the Policy at any time unilaterally in accordance with the applicable laws, notifying the Client about any amendments through the 'bluehills.club' website no later than one month before the amendments enter into force.