

# PRIVACY POLICY FOR GIGALINKED

*We last updated these terms on January 15, 2024*

## 1. Introduction

### 1.1 Purpose and Scope

**1.1.1** This Privacy Policy explains how GigaLinked collects, uses, discloses, and protects the personal data of individuals (“Users” or “you”) who visit our website <https://gigalinked.com>, use our related applications and hosting services, or otherwise interact with us.

**1.1.2** By accessing or using our services, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. This Policy should be read in conjunction with our **Terms of Service** (the “TOS”) and any other referenced documents.

### 1.2 Controller Information

**1.2.1** GigaLinked is stationed in Northern Ireland, acting as the controller for your personal data.

**1.2.2** If you have any questions, concerns, or requests about this Privacy Policy or your personal data, please contact us at:

- **Email:** [support@gigalinked.com](mailto:support@gigalinked.com)
- **Phone:** +44 (73598 30634)

#### 1.2.3 Data Protection Officer (DPO)

- **Name:** Kerem Aydin
- **Phone:** +44 (73598 30634)
- **Email:** [kaydin@gigalinked.com](mailto:kaydin@gigalinked.com)

### 1.3 Relation to Terms of Service

**1.3.1** This Policy forms part of our Agreement with you, as defined in our TOS. In the event of any conflict between the TOS and this Privacy Policy with respect to personal data handling, this Privacy Policy shall prevail.

## 2. Data We Collect

### 2.1 Types of Personal Data

**2.1.1 Contact Details:** Name, email address, phone number, and billing address.

**2.1.2 Account Information:** Username, password, and service usage metrics (e.g., server configurations, user preferences).

**2.1.3 Financial Information:** Partial payment data (e.g., transaction history). We do not store full credit/debit card numbers directly on our servers, supported by a PCI-compliant

gateway.

**2.1.4 Technical/Usage Data:** IP addresses, browser type, operating system, device identifiers, and access logs.

**2.1.5 Communication Data:** Emails, tickets, live chat transcripts, or other messages exchanged with us.

## **2.2 Voluntary and Mandatory Data**

**2.2.1** Some information is **required** for us to deliver our services (e.g., contact/billing details). Failure to provide this information may limit our ability to fulfill your requests or provide the requested service.

**2.2.2** You may also provide optional data (such as preferences or optional profile details), which helps us improve user experience but is not strictly necessary for service provision.

## **3. How We Use Your Data**

### **3.1 Service Provision and Account Management**

**3.1.1** We primarily process your data to deliver the services you have ordered from us, maintain your account, handle billing, and provide customer support in line with Section 2 of the TOS.

### **3.2 Communication and Notifications**

**3.2.1** We use your contact details to respond to inquiries, send important updates (e.g., service status, policy changes), or notify you of relevant information concerning your account or usage.

Thought for a couple of seconds

Below are **revised, user-friendly** texts for the two sections you highlighted, **3.3 (Legal and Regulatory Requirements)** and **9 (Your Rights)**. These versions expand on your existing language and provide a bit more clarity, without overwhelming users with too much legal jargon.

### **3.3 Legal and Regulatory Requirements**

**3.3.1** We may process or retain certain personal data as required by **UK law** for purposes such as tax filing, accounting, fraud prevention, and lawful requests from public authorities. For example, we might need to keep payment records to satisfy **HMRC** (Her Majesty's Revenue and Customs) reporting obligations, or share information if we receive a valid court order. This aligns with Section 10 of our TOS regarding legal compliance, dispute resolution, and cooperation with law enforcement.

**3.3.2** We only disclose the specific data needed to fulfill these obligations, and we limit access to individuals in our organization or external advisors (e.g., accountants, legal counsel) who genuinely need it to comply with the law.

### **3.4 Marketing and Optional Services**

**3.4.1** With your **explicit consent**, we may send you marketing emails about new products, promotions, or offers. You can withdraw consent at any time by unsubscribing or contacting support@gigalinked.com.

### **3.5 Legitimate Interests**

**3.5.1** In some cases, we process your data under **legitimate interests**, such as safeguarding our infrastructure, detecting abuses (e.g., DDoS or spam), and improving services. Refer to the TOS (Section 4.2 Malicious Activity) for how we handle fraudulent or abusive uses of our platform.

## **4. Legal Basis for Processing**

### **4.1 Consent**

**4.1.1** We rely on user consent for optional email newsletters, certain cookies, or other explicitly opted-in features.

### **4.2 Contractual Necessity**

**4.2.1** If you purchase or use our services, we must process certain personal data to fulfill our **contractual obligations** (e.g., provisioning game servers, managing your account).

### **4.3 Legal Obligations**

**4.3.1** We may process or keep certain personal data to meet our legal and regulatory obligations under UK law. This includes, for example, requirements in the Data Protection Act 2018, UK GDPR, and tax or accounting regulations that require us to maintain business records for a specific period.

**4.3.2** In addition, there may be times when we must share personal data to comply with lawful requests from public authorities (such as law enforcement). If a valid warrant, subpoena, or other legal directive is presented, we will disclose the necessary information only to the extent required by law. This helps ensure that GigaLinked, its users, and the wider public remain protected from illegal or harmful activities.

### **4.4 Legitimate Interests**

**4.4.1** Activities like website analytics, minimal direct marketing to existing customers, or anti-fraud measures may fall under our legitimate interests, as outlined in the TOS (especially around system security and user account integrity).

## **5. Cookies and Similar Technologies**

### **5.1 Cookie Usage**

**5.1.1** We use **cookies** to enhance website functionality, store user preferences, and analyze traffic. Essential cookies are necessary for core site operations, while optional cookies (e.g., analytics, marketing) require your consent.

## **5.2 Managing Cookies**

**5.2.1** You can configure your browser settings to reject non-essential cookies. However, disabling cookies may limit certain features on our site or services.

## **5.3 Third-Party Integrations**

**5.3.1** We may embed third-party services (e.g., payment gateways, analytics providers) that set their own cookies. Please refer to their respective cookie policies for details.

# **6. Data Sharing and Transfers**

## **6.1 Service Providers**

**6.1.1** We may share data with third-party vendors (e.g., payment processors, domain registrars, hardware providers) strictly to perform core functions **only** to the extent needed to deliver or enhance our services.

## **6.2 Legal Compliance**

**6.2.1** If required by law, court order, or law enforcement request, we may disclose personal data to the appropriate authorities. This aligns with Section 10.3 of our TOS about legal remedies and potential cooperation with authorities.

## **6.3 International Transfers**

**6.3.1** Where data is transferred outside the UK/EEA, we ensure **adequate safeguards** (e.g., Standard Contractual Clauses) are in place to protect your information in compliance with **UK GDPR**.

# **7. Data Retention**

## **7.1 Retention Periods**

**7.1.1** We store personal data only as long as necessary to fulfill the purposes described in Section 3 of this Policy or comply with legal obligations.

**7.1.2** If we terminate or delete your account (per TOS Section 10.2), we will securely dispose of or anonymize your personal data unless retention is required by law (e.g., financial records).

## **7.2 Deletion Requests**

**7.2.1** You may request deletion of your personal data at any time if it's no longer needed for legitimate or contractual purposes. Some data (like invoices) may remain for statutory retention periods.

## 8. Data Security

### 8.1 Technical and Organizational Measures

**8.1.1** We employ industry-standard security safeguards (e.g., encryption, firewalls, access controls) to prevent unauthorized access, loss, or misuse of personal data.

**8.1.2** Passwords and sensitive data are hashed or encrypted at rest, consistent with the measures outlined in Section 2.3.1 of the TOS regarding account credentials.

### 8.2 Incident Response

**8.2.1** If a **data breach** occurs that poses a risk to your rights or freedoms, we will notify the relevant supervisory authority (e.g., ICO in the UK) and, where necessary, affected individuals in accordance with our legal obligations.

## 9. Your Rights

### 9.1 UK GDPR Rights

**9.1.1** Under the **UK GDPR** (as supplemented by the **Data Protection Act 2018**), you have several rights relating to your personal data:

- **Right of Access:** You can request a copy of the personal data we hold about you.
- **Right to Rectification:** If you believe the information we have is inaccurate or incomplete, you can ask us to correct or update it yourself in the client area.
- **Right to Erasure (“Right to be Forgotten”):** You can, in specific situations, request we delete your data (e.g., if it’s no longer needed for the original purpose, or if you withdraw consent where consent was the only legal basis).
- **Right to Restrict or Object to Processing:** You may request that we temporarily or permanently stop processing some or all of your personal data under certain circumstances (e.g., where data accuracy is contested, or where processing is based on legitimate interests you oppose).
- **Right to Withdraw Consent:** If we rely on your consent as our sole legal basis, you can withdraw it at any time for the specific activity it covers.

### 9.2 Exercising Your Rights

**9.2.1** To invoke any of these rights, please contact us at **support@gigalinked.com**. We may ask for proof of identity (such as a photo ID or confirmation of account details) to ensure we only disclose personal data to the correct individual.

**9.2.2** We aim to respond within **30 days** as required by UK data protection laws. If your request is complex or involves multiple data sources, we may extend this timeframe and will notify you accordingly.

**9.2.3** If you’re unsatisfied with our response or feel we’re not handling your request properly, you have the right to lodge a complaint with the **Information Commissioner’s Office (ICO)** or pursue other legal remedies.

## 10. Links to Other Websites

**10.1.1** Our website or services may contain links to third-party sites with their own privacy practices. We are not responsible for the privacy policies or content on those external sites.

**10.1.2** We encourage you to review the third-party site's privacy statement whenever you navigate away from our platform.

## 11. Children's Privacy

**11.1.1** While our TOS sets the minimum user age at **15**, we do not knowingly collect personal data from children under this age without verifiable parental consent. If you believe we have inadvertently collected data from a minor, please contact us at [support@gigalinked.com](mailto:support@gigalinked.com), and we will take steps to delete it.

## 12. Updates to This Policy

**12.1.1** We may modify this Privacy Policy to reflect changes in our practices or legal obligations.

**12.1.2** If significant updates occur, we will notify you via email or a prominent notice on our site, in accordance with the TOS (Section 1.5, "Changes to These Terms").

**12.1.3** Continued use of our services after such notifications indicates your acceptance of the revised Policy.

## 13. Contacting Us

**13.1.1** If you have any concerns, requests, or feedback regarding this Privacy Policy, or want to exercise your data protection rights, please contact us at:

- **Email:** [support@gigalinked.com](mailto:support@gigalinked.com)
- **Phone:** +44 (73598 30634)

We will handle your inquiry promptly and do our best to resolve any questions or concerns you may have.

## 14. Complaints

**14.1.1** If you believe your data has not been handled appropriately or have unresolved privacy-related concerns, you have the right to lodge a complaint with the **Information Commissioner's Office (ICO)** in the UK. For more details, please visit <https://ico.org.uk>.

## 15. Final Acceptance

**15.1.1** By continuing to use any of our services, creating an account, or otherwise engaging with GigaLinked, you confirm that you have read, understood, and agree to this Privacy Policy in full. If you do not agree, you must cease using our services immediately.