

Privacy Policy

This privacy policy (the “**Vostok Capital Management Ltd. Privacy Policy**”) notice provides you with details of how Vostok Capital Management Ltd, a limited liability company (Company Number 991025) formed under the laws of Switzerland with its registered address at Chemin des Rubiettes 10, 1222 Vesenz, Switzerland (“**Vostok Capital Management Ltd**”) collects and processes your Personal Data (as defined in Section 3 below) through your use of the Vostok Capital Management Ltd website located at <https://tip-n-go.com> and any sub-domains used in connection with or related to the same and any future versions (the “**Vostok Capital Management Ltd Website**”) as well as Vostok Capital Management Ltd’s mobile applications (the “**Vostok Capital Management Ltd App**”) and proprietary software (the “**Vostok Capital Management Ltd Software**”). Together, the Vostok Capital Management Ltd Website, the Vostok Capital Management Ltd App and the Vostok Capital Management Ltd Software constitute the “**Vostok Capital Management Ltd Platform**”.

By providing us with your data, you warrant to us that you are over 13 years of age.

Vostok Capital Management Ltd is the data controller and we are responsible for your Personal Data (Vostok Capital Management Ltd is also referred to as “we”, “us” or “our” in this privacy notice).

1. CONTACT DETAILS

Our full contact details are:

Vostok Capital Management Ltd.
Chemin des Rubiettes 10, 1222 Vesenz, Switzerland

Email address: info@tip-n-go.com

It is important that the information Vostok Capital Management Ltd. holds about you is accurate and up to date. Please inform us of any changes to your personal information by emailing us at the email address above.

2. PURPOSE OF DATA PROCESSING

We process your data in order to provide you with the Vostok Capital Management Ltd Platform and all associated services.

3. TYPES OF DATA COLLECTED AND PROCESSED

“**Personal Data**” means any information capable of identifying an individual (and does not include anonymised data). Vostok Capital Management Ltd may process the following categories of Personal Data about you:

- **Communication Data**
“**Communication Data**” includes any communications that you send to Vostok Capital Management Ltd, whether through the contact form on our website, via email, text message, social media messaging, social media posting or by any other means. Vostok Capital Management Ltd processes this data for the purposes of communicating with you. We also process it to keep records and to establish, pursue or defend legal claims. Vostok Capital Management Ltd’s lawful ground for this type of processing is our legitimate interest in replying to communications we receive, keeping records, and establishing, pursuing or defending legal claims.
- **Customer Data**
“**Customer Data**” includes: (1) data provided by you in opening an account on the Vostok Capital Management Ltd Platform (or by someone opening an account on your behalf). Such data may include your name, title, email address, phone number, and other contact details and, in certain circumstances, your photograph; (2) data relating to any payments you make or receive using the Payment Processors associated with the Vostok Capital Management Ltd Platform (such as the amount, date and recipient of payments); and (3) contact details optionally provided by Customers when submitting reviews. Vostok Capital Management Ltd processes this data to enable you to access and use the Vostok Capital Management Ltd Platform, to keep records of any payments you make or receive, and to enable follow-up on Customer reviews by the Owners who use the Vostok Capital Management Ltd Platform. Vostok Capital Management Ltd’s lawful ground for this processing is the provision (or prospective provision) of services to you.
- **Usage Data**
“**Usage Data**” includes data about how you use the Vostok Capital Management Ltd Platform together with any data that you post on the Vostok Capital Management Ltd Platform, including any reviews. Vostok Capital Management Ltd processes this data to operate the Vostok Capital Management Ltd Platform and to make sure that appropriate content is provided to you. Vostok Capital Management Ltd also processes this data to ensure the security of the Vostok Capital Management Ltd Platform, to maintain back-ups of information and to enable the publication and administration of the Vostok Capital Management Ltd Platform. Vostok Capital Management Ltd’s lawful ground for such processing is our legitimate interest in enabling the proper administer of the Vostok Capital Management Ltd Platform and our business.
- **Technical Data**
“**Technical Data**” includes data about your use of the Vostok Capital Management Ltd Platform, and includes:
 - your IP address, log-in details, and browser details;
 - the duration, number and frequency of your visits to Vostok Capital Management Ltd Website pages and the Vostok Capital Management Ltd App, and your page views and navigation paths; and

- time zone settings and other details regarding the devices with which you access the Vostok Capital Management Ltd Platform.

This technical data is produced by analytics tracking system. Vostok Capital Management Ltd processes this data to analyse your use of the Vostok Capital Management Ltd Platform, to administer the Vostok Capital Management Ltd Platform and our business, to deliver website content and advertisements to you, and to analyse the effectiveness of our advertising. Vostok Capital Management Ltd's lawful ground for processing this type of data is our legitimate interests to enable the proper administration of the Vostok Capital Management Ltd Platform and to develop our business and marketing strategies.

- **Marketing Data**

"Marketing Data" includes data regarding your communication and marketing preferences and your preferences regarding Vostok Capital Management Ltd and third parties. Vostok Capital Management Ltd processes this data in order to deliver relevant content and advertisements to you and to analyse the effectiveness of this advertising. Vostok Capital Management Ltd's lawful ground for processing this type of data is our legitimate interests in studying how Users use our products and services, developing such products and services, and determining our marketing strategy.

Vostok Capital Management Ltd may use Customer Data, Usage Data, Technical Data and Marketing Data to deliver relevant content, advertisements and other marketing communications to you and to determine the effectiveness of such advertisements. Vostok Capital Management Ltd's lawful ground for this is our legitimate interest to develop our business.

- **Sensitive Data**

"Sensitive Data" is data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, membership in trade unions, and health, or genetic and biometric data. VOSTOK CAPITAL MANAGEMENT LTD DOES NOT COLLECT ANY SENSITIVE DATA ABOUT YOU.

Vostok Capital Management Ltd may be required to collect Personal Data by law. Vostok Capital Management Ltd may also do so under the terms of the contract between Vostok Capital Management Ltd and you. If you do not provide Vostok Capital Management Ltd with that data when requested, Vostok Capital Management Ltd may not be able to perform the relevant services.

Vostok Capital Management Ltd will only use your Personal Data for the purpose for which it was originally collected or, if necessary, a reasonably compatible purpose. If Vostok Capital Management Ltd is required to use your Personal Data for a new and unrelated new purpose, Vostok Capital Management Ltd will inform you of the grounds for this use.

Vostok Capital Management Ltd may process your Personal Data without your knowledge or consent where this is required or permitted by law.

4. PERSONAL DATA COLLECTION

Vostok Capital Management Ltd may collect data about you when you provide the data directly to us (for example, by completing a form on the Vostok Capital Management Ltd Platform, by opening an account, by sending us emails or messages, or by providing us with feedback). Vostok Capital Management Ltd may collect certain data from you automatically as you use the Vostok Capital Management Ltd Platform. Please see Vostok Capital Management Ltd's cookie policy for more details: <https://tip-n-go.com/terms-and-conditions>

Vostok Capital Management Ltd may receive data about you from third parties such as analytics providers, advertising networks and search information providers based outside of the EU, and from providers of payment and technical services.

5. MARKETING COMMUNICATIONS

Vostok Capital Management Ltd's lawful ground for processing your Personal Data to send you marketing communications is either your consent or our legitimate interest in developing our business.

Under the applicable law, Vostok Capital Management Ltd may send you marketing communications if:

- You have requested information from Vostok Capital Management Ltd or purchased goods or services from Vostok Capital Management Ltd; or
- You have provided Vostok Capital Management Ltd with your details when entering a competition or registering for a promotion or free resources; and
- In the case of either (a) or (b) above, you have not opted out of receiving those marketing communications.

Vostok Capital Management Ltd will obtain your express opt-in consent before sharing your Personal Data with any third party for their marketing purposes.

You can ask Vostok Capital Management Ltd or any third parties to stop sending you marketing messages at any time by: (1) following the opt-out link on any marketing communication you receive; or (2) emailing us at the email address set out in Section 2 above.

Where you opt-out of receiving marketing communications, this will not apply to Personal Data provided to us as a result of the use of a product or service or other transactions.

6. DISCLOSURES OF YOUR PERSONAL DATA

Vostok Capital Management Ltd may be required to share your Personal Data with the following parties:

- Providers of IT and system administration services;
- Professional advisers including lawyers, bankers, auditors and insurers; Tax authorities (including HM Revenue & Customs);
- Other regulators and authorities in Switzerland and other relevant jurisdictions who may require reporting of our activities in certain circumstances; and
- Third parties to whom Vostok Capital Management Ltd sells, transfers, or merges parts of our business or our assets.

Vostok Capital Management Ltd requires all third parties to whom we transfer your data to respect the security of your Personal Data and to treat it in accordance with the law. Vostok Capital Management Ltd only allows such third parties to process your Personal Data for specific purposes that comply with this Privacy Policy and that have been agreed to by Vostok Capital Management Ltd.

In the case of Staffs using the Vostok Capital Management Ltd Platform to connect to a Payment Processor to receive payments of tips via such Payment Processor, Vostok Capital Management Ltd may be required to share Personal Data with your employer or accountants and other professionals working on your employer's behalf for the purposes of: (1) verifying your employment; and (2) enabling such persons to operate payroll and tax procedures.

Vostok Capital Management Ltd may also share Personal Data with such employers for the purposes of implementing schemes for the pooling of tips.

7. INTERNATIONAL DATA TRANSFERS

Vostok Capital Management Ltd is subject to the provisions of the General Data Protection Regulations that protect your Personal Data. If Vostok Capital Management Ltd transfers your data to third parties outside of the EEA, we will ensure that certain safeguards are in place to ensure a similar degree of security for your Personal Data. Therefore:

- Vostok Capital Management Ltd may transfer your Personal Data to countries that the European Commission have approved as providing an adequate level of protection for Personal Data; or
- Where Vostok Capital Management Ltd uses certain service providers who are established outside of the EEA, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give Personal Data the same protection it has in Europe.

If none of the above safeguards is available, Vostok Capital Management Ltd may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

8. DATA SECURITY

Vostok Capital Management Ltd has put in place security measures to prevent your Personal Data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. Vostok Capital Management Ltd allows access to your Personal Data only by those employees and partners who have a business need to know such data. Such persons will only process your Personal Data on Vostok Capital Management Ltd's instructions, and they must keep it confidential.

Vostok Capital Management Ltd has established procedures to deal with any suspected Personal Data breaches. Vostok Capital Management Ltd will notify you and any relevant regulator of a breach if we are legally required to.

9. DATA RETENTION

Vostok Capital Management Ltd will only retain your Personal Data for as long as necessary to fulfil the purposes for which we collected it (including for the purposes of satisfying any legal, accounting, or reporting requirements).

When determining the appropriate period for the retention of data, Vostok Capital Management Ltd considers the following factors with respect to the relevant data: amount; nature and sensitivity; potential risk of harm from unauthorised use/disclosure; processing purposes; and legal requirements.

For tax purposes, the law may require Vostok Capital Management Ltd to keep basic information about our customers (including contact and identity details and financial and transaction data for six years after they stop being customers).

In some circumstances, Vostok Capital Management Ltd may anonymise your Personal Data for research or statistical purposes in which case Vostok Capital Management Ltd may use this information indefinitely without further notice to you.

10. YOUR RIGHTS

Under data protection laws you have rights in relation to your Personal Data, including the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

More information about these rights is available at: <https://www.edoeb.admin.ch/edoeb/en/home/data-protection.html>

If you wish to exercise any of your rights, please email Vostok Capital Management Ltd at the email address set out in Section 2 above.

You will not be charged any fee to access your Personal Data (or to exercise any of the other rights). However, Vostok Capital Management Ltd may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Vostok Capital Management Ltd may also refuse to comply with your request in these circumstances.

Vostok Capital Management Ltd may be required to request specific information from you to help confirm your identity and ensure your right to access your Personal Data (or to exercise any other rights). This is a security measure to ensure that Personal Data is not unlawfully disclosed to any person. Vostok Capital Management Ltd may also contact you to ask you for further information in relation to your request to speed up our response.

Vostok Capital Management Ltd endeavours to respond to all legitimate requests within one month. It may on occasion take longer than one month to respond if your request is particularly complex or you have made numerous requests. In this case, Vostok Capital Management Ltd will notify you.

11. PERSONAL DATA REQUIRED

Providing your personal data as described herein is fundamentally necessary for us to provide you with services via the Vostok Capital Management Ltd-Platform. Therefore, if you do not want to provide your personal data, we will not be able to provide you with such services.

12. THIRD-PARTY LINKS

The Vostok Capital Management Ltd Platform may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. Vostok Capital Management Ltd does not control these third-party websites and we are not responsible for their data management procedures. When you leave the Vostok Capital Management Ltd Platform, we encourage you to read the privacy statement of each website you visit.

13. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Vostok Capital Management Ltd Platform may become inaccessible or not function properly. For more information, please see our Cookie Policy at: <https://tip-n-go.com/terms-and-conditions>

14. VOSTOK CAPITAL MANAGEMENT LTD PLATFORM USAGE – TERMS AND CONDITIONS

By browsing and using the Vostok Capital Management Ltd Platform, you are agreeing to comply with and be bound by the Vostok Capital Management Ltd Terms of Service available at: <https://tip-n-go.com/terms-and-conditions>