

AFFILIATE TOP PRIVACY POLICY

This Affiliate Top Privacy Policy describes Horna Limited policies and procedures on the collection, use, and disclosure of Your information (including personal data) when You participate in the Affiliate Top Affiliate Program through the website affiliate.top (hereinafter the 'Website'), and/or other Our services and tells You about Your privacy rights and how the law protects You.

This Affiliate Top Privacy Policy is an integral part of the [Affiliate Top Affiliate Agreement](#).

The information You provide is collected and processed by Horna Limited, a company registered in accordance with the laws of Hong Kong with registration number 3331076, located at Rm 7B, One Capital Place, 18 Luard Road, Wan Chai, Hong Kong, (hereinafter - the 'Company', 'We', 'Us', or 'Our'), providing access to the Website.

We assure You that We take all measures necessary to ensure the confidentiality of the personal data that You provide to Us.

We encourage You to carefully read this Affiliate Top Privacy Policy. By registering on the Website, You fully and unconditionally agree to its terms.

INTERPRETATION AND DEFINITIONS

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following definitions.

The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Affiliate Top Privacy Policy:

'You' means the individual or representative of a legal entity accessing or using the Website.

'Cookies' means small files that are placed on Your computer, mobile device, or any other device by a website, which contain the details of Your browsing history on that website.

Any other terms are interpreted in accordance with the [Affiliate Top Affiliate Agreement](#).

1. THE INFORMATION YOU PROVIDE TO US

1.1. Like most websites, We use Cookies.

Some Cookies are necessary for the normal operation of the Website and are used without obtaining Your additional permission. These files include the following:

- a) Cookies needed to identify the source from which the transition was made to the Website;
- b) Cookies containing Your session ID on the Website.

We also collect and process data about Your device, including the IP address (Internet Protocol address), browser type, browser version, browser configuration (hereinafter the 'Usage Data').

1.2. When registering on the Website, We ask You to provide Us your email address. You may also enter Your phone number, Telegram account, and Skype ID.

In the future, You have the option to enter Your country, phone number, Telegram account, Skype ID, and traffic sources in Your Personal Account on the Website.

1.3. We also ask You to provide Your payment details (including type and number of Your e-wallet, account holder name (if applicable), telephone number (if applicable), city (if applicable), first and last name (if applicable), date of birth (if applicable)), or bank details (including account number, bank name, account holder name (if applicable), beneficiary name (if applicable), tax ID number (if applicable), Your address (if applicable), Your telephone number (if applicable), and Your email address (if applicable)).

1.4. For Your identification, We may request You to provide:

- the spread (page) of Your passport with Your photograph and personal data, or the front and back of Your ID card, or Your driver's license;
- personal identification number, date of birth, nationality, address of residence, registration number for tax authorities.

1.5. We collect and store data on Your activity on the Website, as well as information contained in web server reports (including the interface language, browser type, and date and time of the last visit).

1.6. From time to time, We may ask You to fill out questionnaires in order to improve Our Affiliate Program, for statistical purposes, or to comply with applicable laws.

Sometimes when filling out a form You will be asked to provide Your name and email address.

1.7. When contacting the Company's Affiliate Support Service, We ask You to include Your first and last name, and email address.

1.8. If You become a winner in Our promotions, We may ask You provide Us Your first and last name, address, and phone number, so We can send You a prize.

1.9. Anytime, We may send You presents or promotional gifts in order to promote our Affiliate Program. In such cases, You will be asked to provide Us Your first and last name, address, and phone number.

2. HOW WE USE THE INFORMATION YOU PROVIDE

2.1. The information We receive about You allows Us to provide You with the possibility to participate in the Affiliate Program, develop Our existing services, and create new ones.

2.2. The data collected when visiting the Website is necessary for its operation and subsequent analysis, as well as to provide You with information in the most convenient way for You.

For example, such data makes it possible to determine the appropriate language of the Website user interface.

2.3. The data provided during registration (including phone number, Telegram account, country, and email address) is used to contact You and provide You with the most accurate and personalized information.

Moreover, the data obtained by Us during identification is necessary to ensure the legality and security of the Company's services.

2.4. Your payment information (including bank details) is used by the Company to pay You Affiliate and/or Referral Payouts.

2.5. Information about Your activity on the Website, as well as information from web server reports, is used to protect You and block scammers from accessing Your Account.

2.6. We may use Your email address in order to send You system notifications and advertising materials.

You have the right to unsubscribe from the Company's mailing list at any time by clicking on the 'Unsubscribe' link in any email from the Company, by deactivating the corresponding option in Your Personal Account, or by contacting the Company's Affiliate Support Service via email address support@affiliate.top.

We are committed to promptly responding to a request from You to unsubscribe from all types of emails.

2.7. From time to time, We may send You email notifications about changes in the operation of the Website or the terms of service provision.

2.8. Moreover, We need your data in order to personalize the content of the Website and show You relevant advertising.

2.9. The data You provide when contacting the Company is necessary in order to establish the circumstances of Your request and provide a complete answer in the shortest possible time.

In the event We need to use the information provided for other purposes, We always ask for Your consent.

In the event of automated processing of Your personal data, We ensure that such processing does not have any impact on You.

3. RETENTION OF YOUR PERSONAL DATA

We will retain Your personal data only for as long as is necessary for the purposes set out in this Affiliate Top Privacy Policy. We will retain and use Your personal data to the extent necessary to comply with Our legal obligations (for example, if We are required to retain Your data to comply with applicable laws), resolve disputes, and enforce Our legal agreements and policies.

Any personal data that We process for any purpose or purposes shall not be kept for longer than are necessary for that purpose or those purposes.

4. YOUR RIGHTS

4.1. Your principal rights regarding Your personal data are as follows:

(a) **The right to access**

This enables You to receive a copy of the personal data We hold about You;

(b) **The right to rectification/correction**

This enables You to have any incomplete or inaccurate data We hold about You corrected; however, We may need to verify the accuracy of the new data You provide to Us;

(c) **The right to erasure**

This enables You to ask Us to delete or remove Your personal data where there is no good reason for Us to continue processing it;

(d) **The right to restrict or object to processing**

This enables You to initiate the suspending of the processing of Your personal data;

(e) **The right to withdraw consent**

However, this will not affect the lawfulness of any processing carried out before You withdraw Your consent.

4.2. This list of rights is not complete and may include other rights established by applicable law.

4.3. Please note that Your right to demand that We suspend or terminate the processing of Your personal data and/or delete it is not absolute and may be limited by applicable law.

In addition, exercising this right may serve in some cases as a basis for termination of the Affiliate Agreement with You.

5. TRANSFER OF YOUR PERSONAL DATA

5.1. Your information may be transferred to — and maintained on — computers located outside of Your state, province, country, or other governmental jurisdiction, where the data protection laws may differ from those of Your jurisdiction.

5.2. Your consent to this Affiliate Top Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

5.3. The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Affiliate Top Privacy Policy, and no transfer of Your personal data will take place to an organization or a country unless there are adequate controls in place, including the security of Your data and other personal information.

6. DISCLOSURE OF YOUR PERSONAL DATA

6.1. Your personal data may be disclosed for the following purposes:

- **Business Transactions**

If the Company is involved in a merger, acquisition, or asset sale, Your personal data may be transferred. We will provide You with notice before Your personal data is transferred and becomes subject to a different privacy policy.

- **Law Enforcement**

Under certain circumstances, the Company may be required to disclose Your personal data if required to do so by applicable law or in response to valid requests by public authorities (e.g., a court or a government agency).

- **Other Legal Requirements**

The Company may disclose Your personal data in the good faith belief that such action is necessary to:

- comply with a legal obligation; and/or
- protect and defend the rights or property of the Company; and/or
- prevent or investigate possible wrongdoing in connection with the using of the Website and/or Advertiser's Website, and/or Advertiser's Mobile Application; and/or
- protect the personal safety of Our clients and/or clients of Our clients; and/or
- protect against legal liability.

7. THE INFORMATION WE PROVIDE TO THIRD PARTIES

7.1. We do not share Your personal data with third parties who are not affiliated with Your activity on the Website.

7.2. Third parties to whom We may transfer Your personal data process them on Our behalf and strictly in accordance with Our requirements, instructions, and this Affiliate Top Privacy Policy.

Such third parties may include:

- 1) a limited number of Our employees and employees of Our affiliates;
- 2) professional auditors;
- 3) professional dispute resolution organizations;
- 4) payment systems;
- 5) payment system providers.

7.3. If You become a winner in Our promotions, We may provide Your first and last name, address, and phone number, to Our partners and/or a postal or courier service to send You a prize.

7.4. We may provide Your first and last name, address, and phone number, to Our partners and/or a postal or courier service in order to send You presents or promotional gifts.

7.5. We may also transfer information to countries outside the European Economic Area. The level of protection of personal data in those countries may vary.

However, Our partners in such jurisdictions are always bound by contractual obligations to maintain an adequate level of protection of any transmitted data, and We take all possible measures to ensure the confidentiality of the information You provide.

In the event the Company participates in mergers or acquisitions, it may be necessary to transfer Your personal data to Our future partners, and We guarantee the confidentiality of that data.

7.6. With Your prior consent, We may provide information about You to companies, organizations, or individuals not listed in this Affiliate Top Privacy Policy.

8. PROTECTING TECHNICAL INFORMATION

8.1. To ensure the security of the information You provide, We have implemented special rules and technical measures to protect that information.

8.2. We use a Secure Sockets Layer (SSL) encryption system for transmitted data.

9. PASSWORDS

9.1. When registering on the Website, You specify Your email address and set Your own password for Your Account.

9.2. We do not have the right to make changes to such data and cannot be held responsible for how You ensure its confidentiality.

9.3. We ask You to immediately report any unauthorized or other suspicious activities related to the use of Your Account.

10. THE USE OF OUR SERVICES BY MINORS

10.1. The Website is an open resource, but is not intended for use by persons under the legal age in accordance with applicable law.

10.2. In the event that We become aware that a minor has provided or attempted to provide their personal information to register on the Website, We delete such information from the Company's servers.

11. CHANGES

11.1. From time to time, We may make changes to this Affiliate Top Privacy Policy, but the content of such changes will never limit Your rights with respect to Your personal data to a greater extent than is established by applicable law.

11.2. In the event of changes, they enter into force from the moment of posting the amended text of the Affiliate Top Privacy Policy on the Website, unless a different deadline is specified for the changes to enter into force. We inform You of such changes via email.

11.3. If You do not agree to the amended edition of the Affiliate Top Privacy Policy, We ask You to stop using the Website and block Your Account by contacting the Company's Affiliate Support Service via email address support@affiliate.top.

11.4. In the case of a discrepancy between the text of this Affiliate Top Privacy Policy in English and the text in other languages, the version of the Affiliate Top Privacy Policy in English shall prevail.

12. CONTACTS

If You have any questions or would like to receive additional information regarding the processing of Your personal data, to check what is being processed, or to withdraw Your consent to such processing, You may contact us at dataprotection@affiliate.top.

Effective February 1, 2025