

VIBO TIPS OU - PRIVACY POLICY

1. INTRODUCTION

This Privacy Policy explains how VIBO TIPS OU (“Company,” “we,” “us,” or “our”) collects, uses, discloses, and protects your personal data when you use our services through the VIBO Platform (“Platform”). It applies to all registered service providers (“you,” “your,” or “Service Provider”) who use the Platform to collect Tips.

We are committed to protecting your privacy and processing your personal data in accordance with the General Data Protection Regulation (GDPR) and other applicable laws of the Republic of Estonia.

This Privacy Policy only applies to the use of your personal data obtained by us, whether from you directly or from a third party. It does not apply to personal data collected by third parties during your communications with those third parties or your use of their products or services.

Any definitions used in this Policy shall have the meanings given to them in the Vibo Tips Terms and Conditions.

2. DATA CONTROLLER

The data controller responsible for your personal data is:

VIBO TIPS OU

Narva mnt 7-557, Kesklinna linnaosa, Tallinn, 10117, Estonia

Email: support@vibo.tips

Registration No.: 16917338

3. TYPES OF PERSONAL DATA WE COLLECT

Identity Data	First name; last name. Your selfie. Audio and video of the verification process. ID number, date of issue, expiration date, country of issuance, your ID photo
Contact Data	Delivery addresses; billing addresses; email address; telephone number; social media handles.
Registration Data	First name; family name; date of birth; gender; country; nationality; username; e-mail address, phone number, any other personal data that you may provide when you register an Account with us.

Identity Data	First name; last name. Your selfie. Audio and video of the verification process. ID number, date of issue, expiration date, country of issuance, your ID photo
Employment Data	We may collect and process data about when and where you have worked to support tip-sharing functionality.
Financial Data	Bank account details; card information details (for Payouts).
Transaction Data	Details about payments made between you and us; details of products purchased from us. Login and Platform usage information.
Profile Data	Account username; password; profile picture or avatar; purchase/order details; interests and preferences; contact preferences; the content of any complaints or enquiries you send us. Your occupation.
Technical Data	IP address and device data

4. PURPOSES AND LEGAL BASIS FOR PROCESSING

We process your personal data for:

- Account registration and management
- Tip processing and payouts
- Identity verification and fraud prevention
- Customer support
- Legal obligations (AML/CTF compliance)
- Platform improvement and security
- Communication of legal or operational updates

Purposes of Data Processing

Use of the Platform

The Account applicants will need to complete the registration form, providing all required Identity Data, Contact Data, Registration Data;

Financial Data and Profile Data. We will use this data in order to process your registration.

Once the account is registered, we will process your Identity Data, Contact Data, Registration Data and Profile Data to identify you when you log in to your Account.

We will also process Technical Data so that we can administer your Account and contact you about your account.

We will also collect and process Technical Data when you use certain features and functionality of the Platform. This data helps us understand how you use our Platform so that we can improve it.

It is necessary for us to use your personal data to perform our obligations in accordance with the Agreement we have with you, or it is in our legitimate interest to use personal data in such a way to ensure that we provide access to the Platform and our Services in a secure and effective way and so that we can make improvements to the Platform.

Rendering of the Services

We collect and maintain personal data that you submit to us to ensure that the tips are treated in the way you decide, which can include sharing those tips with others. We may collect and process your personal data whether you are interacting with us on your own behalf or on behalf of any organisation you represent. The personal data we process may include your Contact Data, Registration Data, and Financial Data (where applicable). We process this information so that we can fulfil the supply of Services, maintain our user databases and to keep a record of how our Services are being used.

It is necessary for us to use your personal data to perform our obligations in accordance with the Agreement that we have with you, or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that we provide the Services in an effective, safe and efficient way.

5. DATA SHARING

We may share data with:

- Payment service providers
- Identity verification providers

- Legal/regulatory authorities
- Cloud/IT service providers

We only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations.

6. INTERNATIONAL TRANSFERS

Transfers outside the EEA are safeguarded by standard contractual clauses or equivalent protection. You acknowledge that your personal data may be transferred outside the EEA where it will be stored and processed by us and our suppliers in order to provide our Platform and our Services.

7. DATA RETENTION

As to the personal data that we process in connection with functioning of our Platform and the supply of our Services, we may retain your personal data for up to six years of its provision to us and in compliance with our data protection obligations. We may then destroy such files without further notice or liability.

Where we process personal data in connection with the registration and use of your Account on our Platform, we may retain your personal data for up to six years from the date that the relevant account is terminated (and in compliance with our data protection obligations). We may then destroy such files without further notice or liability.

Where we process any other personal data, we will retain relevant personal data for up to three years from the date of our last interaction with you (and in compliance with our data protection obligations). We may then destroy such files without further notice or liability.

8. YOUR RIGHTS

With regards to the Privacy Policy, you have the following rights with regards to the data processing: right of access, rectification, erasure, restriction, objection, portability, withdrawal of consent, complaint to Estonian Data Protection Inspectorate.

9. SECURITY

We provide up-to-date technical and organizational security measures according to the highest standards in the industry, including 2FA and

encryption.

10. COOKIES

Please, see Cookies Policy.

11. CHANGES

We may make unilateral changes to this Policy. We strive to notify you at least 14 days before such changes take effect, however, we are under no obligation to do it. Therefore, we recommend that you regularly re-read the Policy to get yourself acquainted with any changes hereto.

12. CONTACT

If you have any enquiries or complaints about the this Privacy Policy, submit a written claim or an enquiry regarding the Platform and the Services via the following communication channels:

By e-mail: support@vibo.tips

By registered mail to the address: VIBO TIPS OU, Address: Harju maakond, Tallinn, Kesklinna linnaosa, Narva mnt 7-557, 10117;

We shall answer your claim in writing within 30 days since the date of its receipt. The answer will be sent to your e-mail provided at the time of registration of the Account or amended by You thereafter.