



Privacy Notice

Intro

Protecting your personal data and maintaining your trust is at the core of everything we do. This Privacy Notice (“**Privacy Notice**”) applies to our website: <https://rubyplay.com/> (“**Website**”) and explains how we collect, use, and safeguard your personal data when you interact with the Website.

About us

The Privacy Notice explains how **Rubyplay Limited** (“**Company**” or “**we**”) acts as the Controller of your personal data processed through the Website.

To review, correct, or erase your personal information, to object to processing, to transfer your personal data to another party, or to fulfil other rights you may find at the end of the Privacy Notice, please email us at dpo@rubyplay.com.

Our contact address: 14, Soho Office Space, The Strand, Fawwara Building, 1-Imnsida, Gzira, GZR 1401, Malta.

How we handle your personal data

As a Controller, we decide how and why your personal data is processed for activities such as:

- providing products and services
- detecting and monitoring fraudulent activity on our Website
- meeting regulatory compliance requirements
- enhancing and improving our products
- contacting you
- tracking the visitor’s activity on the Website.

Lawful bases for processing

To process your personal data, we rely on the following lawful bases:

- performance of the contract — for the processing necessary for the negotiating on, conclusion, and performance of a contract with you
- legitimate interest — for the processing aimed at the development of our services, taking into consideration your interests, rights, and expectations
- legal obligation — for the processing as required by applicable laws (for example, to comply with tax or KYC/AML regulations) or if requested by a law enforcement agency, court, supervisory authority, or another state-authorized public body
- consent — for additional specific purposes.

Where did we get your personal data from?

We collect personal data from various sources to ensure the seamless provision of our services and compliance with applicable laws. Below is an overview of how we obtain your personal data:

Directly from you:

- through our Website when you fill out forms, subscribe to newsletters, or communicate with us directly

Automatically through technology:

- Website: data such as your IP address, device information, and browsing behavior may be collected when you visit our Website.
- cookies and tracking technologies. We use cookies and similar tools to enhance your experience and analyse service usage.

We process your data in the following ways

When you visit our Website

Purpose	Lawful basis	Data	Storage period	Data recipients
<i>To collect data via the Contact Form</i>	Performance of the contract	Name, Company name, Email, Phone number, Message text	3 years	<i>Rubyplay Limited</i>
<i>To collect cookies and technical data (e.g. IP address, device/browser info) for website functionality, security, and analytics</i>	Legitimate interest (for necessary cookies) Consent (for analytics cookies)	Cookie identifiers, IP address, Browser type/version, Device/OS info, Date/time of access	3 years	<i>Google Analytics</i>

If you are using our career page, it is operated by Talenlyft and we do receive access to the data you submit (such as CVs, cover letters, etc.). However, since it is processed on Talenlyft's side, we encourage you to consult their [privacy notice](#) for details on how they handle your personal data.

Cookies

Cookie	Domain	Description	Duration	Type
<i>__cf_bm</i>	rubyplay.com	This cookie, set by Cloudflare, supports Cloudflare Bot Management.	1 hour	Necessary
<i>bcookie</i>	linkedin.com	LinkedIn sets this cookie to track the use of embedded services.	1 year	Advertisement

<i>li_gc</i>	linkedin.com	LinkedIn sets this cookie to store a visitor's consent regarding using cookies for non-essential purposes.	6 months	Functional
<i>lidc</i>	linkedin.com	LinkedIn sets the lidc cookie to facilitate data center selection.	1 day	Functional
<i>ga*</i>	rubyplay.com	Google Analytics sets this cookie to store and count page views.	1 year 1 month 4 days	Analytics
<i>_ga</i>	rubyplay.com	Installed by Google Analytics, this cookie calculates visitor, session, and campaign data and tracks site usage for analytics reports (it stores information anonymously and assigns a randomly generated ID to each visitor).	1 year 1 month 4 days	Analytics
<i>_pk_id.*</i>	rubyplay.com	Set by to store a unique user ID.	1 year 1 month	Analytics
<i>_pk_ses.*</i>	rubyplay.com	Set to store a unique session ID for gathering information on how users use the website.	1 hour	Analytics
<i>wp-wpml_current_language</i>	rubyplay.com	WordPress Multilingual plugin sets this cookie to store the current language/language settings.	Session	Functional

<i>wpEmojiSettingsSupports</i>	rubyplay.com	WordPress sets this cookie when users interact with emojis on a WordPress site. It helps determine whether the browser can display emojis correctly.	Session	Necessary
<i>cookieyes-consent</i>	rubyplay.com	CookieYes sets this cookie to remember users' consent preferences so that those preferences are respected on subsequent visits to the site (it does not collect or store personal information).	1 year	Necessary

With whom do we share your personal data?

We can share your personal data with third parties without harming you and in full compliance with applicable law. In addition, we have implemented organisational and technical measures to ensure the security of personal data during data transfer to third parties.

Third parties	Description
Analytics tools	We use analytics tools to understand and promote our business.
Contractors, services providers on the Website	We cooperate with service providers and contractors to provide you with their services, operate, develop and improve the features and functionality of the Website, fulfil your support requests, complete payment transactions, etc.
Providers of the services our team use	We use CRM systems, messengers, and other services in our organisation to provide you with our services.
State authorities, courts, law enforcement agencies, etc	We may be obliged to transfer some of your data to tax authorities, courts, law enforcement agencies, and other governmental bodies: <ul style="list-style-type: none"> to comply with a government request, court order, or applicable law; to prevent unlawful use of the Website to protect against claims of third parties to help prevent or investigate fraud.
To get a detailed list of the third-party recipients of your personal data, contact us.	

To share your data, we may rely on the following lawful bases, depending on the case: consent, compliance with the law, and performance of a contract.

International data transfers

We may share your personal data with third parties located in countries outside the one where your data was originally collected. This may include countries outside the European Economic Area (“EEA”).

It’s important to note that some of these countries may not have the same level of data protection as those in the EEA. When we transfer your personal data to countries outside the EEA or to countries not recognised by the European Commission as having [adequate data protection laws](#), we ensure your personal data is protected in line with applicable laws.

We do this by either:

- relying on specific legal exceptions (e.g., when the transfer is necessary to fulfil a contract or for legal claims) or
- putting appropriate safeguards in place, such as using Standard Contractual Clauses approved by the European Commission.

If you would like more details about how we protect your personal data during these transfers, please feel free to contact us at dpo@rubyplay.com.

Safeguards implemented to protect your personal data

We have implemented a comprehensive set of technical, organisational and physical measures to protect your personal data against unauthorised access, loss, misuse, or disclosure.

These measures include:	
<ul style="list-style-type: none">• data encryption• secure servers• access controls• regular security audits• staff training on data protection practices• non-disclosure agreements (NDA)	<ul style="list-style-type: none">• transfer protection• internal policies and instructions• video monitoring• limited access to premises• backups.

Additionally, we work with trusted service providers who are contractually required to implement equivalent protections. By continuously monitoring and updating our security protocols, we ensure that your personal data remains secure and compliant with applicable data protection laws.

Your rights

Your privacy rights: EU and UK

To request information about the processing of your personal data and get access to the personal data held about you

You have a right of access that gives you the right to obtain a copy of your personal data, as well as other supplementary information.

To request that any incorrect, inaccurate or incomplete personal data be corrected

You have the right to have inaccurate personal data rectified.

To request that personal data be erased when it is no longer needed or if processing is unlawful.

You have the right to have personal data erased. This is also known as the “right to be forgotten”. The right is not absolute and only applies in certain circumstances. Contact us if you want to learn more about this right.

To request the restriction of processing your personal data in specific cases

You have the right to restrict the processing of your personal data in certain circumstances. This is an alternative to requesting the erasure of their data.

To receive your personal data in a machine-readable format and transfer it to another controller (“data portability”)

You have the right to data portability, which gives you the right to receive personal data you have provided to us in a structured, commonly used and machine-readable format. It also gives you the right to request us to transmit those data directly to another controller.

To object to the processing of your personal data for marketing purposes, or if there are grounds relating to your particular situation.

You have the right to object to the processing of your personal data at any time.

Not to be subject to a decision based solely on automated processing

You have the right to request that decisions based on automated processing of their personal data, which significantly affect them, are made by natural persons and not only by computers.

To withdraw your consent at any time

The GDPR gives you a specific right to withdraw consent at any time.

To lodge a complaint with a supervisory authority

You, as a data subject, have the right to lodge a complaint with a supervisory authority. You may find it [here](#).

If you have any questions about the protection of your personal data or would like to exercise any of your rights, you can contact us by email at dpo@rubyplay.com.

UK residents enjoy the same rights but may lodge a complaint at the local authority– the Information Commissioner’s Office.

You can contact them at 0303 123 1113 or go online at www.ico.org.uk/concerns.

Your privacy rights: United States

If you are a resident of the United States, certain federal or state-specific rights may apply. These include:

Right	Description	Area	
Right to access	You can request an explanation of the processing of your personal data.	<ul style="list-style-type: none">● California● Colorado● Connecticut● Indiana● Iowa	<ul style="list-style-type: none">● Montana● Tennessee● Texas● Utah● Virginia.
Right to correct	You can change the data if it is inaccurate or incomplete.	<ul style="list-style-type: none">● California● Colorado● Connecticut● Indiana	<ul style="list-style-type: none">● Montana● Tennessee● Texas● Virginia.
Right to delete	You can send us a request to delete your personal data from our systems.	<ul style="list-style-type: none">● California● Colorado● Connecticut● Indiana● Iowa	<ul style="list-style-type: none">● Montana● Tennessee● Texas● Utah● Virginia.

Right to portability	You can request all the data you provided to us and request to transfer data to another controller.	<ul style="list-style-type: none"> ● California ● Colorado ● Connecticut ● Indiana ● Iowa 	<ul style="list-style-type: none"> ● Montana ● Tennessee ● Texas ● Utah ● Virginia.
Right to opt out of sales	The right to opt out of the sale of personal data to third parties.	<ul style="list-style-type: none"> ● California ● Colorado ● Connecticut ● Indiana ● Iowa 	<ul style="list-style-type: none"> ● Montana ● Tennessee ● Texas ● Utah ● Virginia.
Right to opt out of certain purposes	The right to opt-out of processing for profiling/targeted advertising purposes.	<ul style="list-style-type: none"> ● Colorado ● Connecticut ● Indiana ● Montana 	<ul style="list-style-type: none"> ● Tennessee ● Texas ● Utah ● Virginia.
Right to opt out of processing of sensitive data	The right to opt-out of processing of sensitive data.	<ul style="list-style-type: none"> ● California. 	
Right to opt in for sensitive data processing	The right to opt in before processing of sensitive data.	<ul style="list-style-type: none"> ● Colorado ● Connecticut ● Indiana ● Montana 	<ul style="list-style-type: none"> ● Tennessee ● Texas ● Virginia.
Right against automated decision-making	A prohibition against a business making decisions about a consumer based solely on an automated process without human input	<ul style="list-style-type: none"> ● California ● Colorado ● Connecticut ● Indiana ● Iowa 	<ul style="list-style-type: none"> ● Montana ● Tennessee ● Texas ● Virginia.
Private right of action	The right to seek civil damages from a controller for violations of a statute.	<ul style="list-style-type: none"> ● California. 	

Please note! Some states do not have privacy laws. The rights of residents of such states are governed by U.S. federal law. If your state is not on the list, please [contact us](#).

Do not sell my personal information

California residents have the right under the California Consumer Privacy Act (“**CCPA**”) to opt out of the “sale” of their personal information by a company governed by the CCPA.

Rubyplay Limited does not sell your personal information to anyone nor use your data as a business model.

However, we support CCPA by allowing California residents to opt out of any future sale of their personal information. If you want to record your preference that we will not sell your data in the future, please contact us via dpo@rubyplay.com.

Do-not-track requests

California residents visiting the Website may request that we do not automatically gather and track information about their online browsing movements across the Internet.

Such requests are typically made through web browser settings that control signals or other mechanisms that allow consumers to exercise choice regarding collecting personal data about an individual consumer's online activities over time and across third-party websites or online services.

Your privacy rights: Canada

If you are located in Canada, the Personal Information Protection and Electronic Documents Act ("PIPEDA") provides:

- right to access: you can request access to your personal information
- right to correction: if any information is incorrect, you may request corrections
- consent requirements: we require meaningful consent before collecting or using your data
- limiting use and retention: we only use your data for the purposes for which it was collected.

To exercise your rights under PIPEDA, please contact us at dpo@rubyplay.com.

If your complaint is not satisfied, you can file a complaint to the [Office of the Privacy Commissioner of Canada](#).

Automated decisions

We use neither automated decision-making nor your personal data to assess aspects of your personality (automated profiling) automatically.

Revision history

We may occasionally update the Privacy Notice to ensure it provides clear and up-to-date information about how we handle your personal data. When we do, we'll take reasonable steps to inform you, such as posting the updated notice on our Website.

You can access the most recent version of the Privacy Notice at any time on our Website.

You may see the revision history in the Table below:

Version	Date	Updates
1.0.	April 1, 2025	<i>The initial version of the Privacy Notice was published.</i>

This Privacy Notice is developed according to the General Data Protection Regulation ("GDPR"), other applicable privacy laws, and best privacy practices.

Existing laws and requirements for processing personal data are subject to change. In this case, we will publish a new version of the Privacy Notice on the Website.