



UMBRIEL LLC
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Privacy Policy

Information privacy is about giving individuals some control over when, how and to what extent information about themselves is communicated to others. eSIM.club, the provider of the eSIM.club service, is committed to providing Subscriber with privacy safeguards that are consistent with Subscriber's right to choose whether Subscriber wish to provide information about Subscriber'sself, and if Subscriber does provide it, the nature and quality of that information. By using the website and services, Subscriber agrees to the collection and use of Subscriber's information in accordance with this Privacy Policy. If Subscriber does not agree with this Privacy Policy, please do not use he website or the services.

Data controller

eSIM.club (referred to as "eSIM.club" in this policy) is the data controller of all personal data that is collected and processed for providing eSIM.club's services. eSIM.club. Is registered at the registrar of companies in **MBRIEL LLC 30 NORTH GOULD STREET, SHERIDAN, WY 82801** eSIM.club as a provider of the eSIM.club services, is committed to providing Subscriber with privacy safeguards that are consistent with Subscriber's right to choose whether to provide information about Subscriber'sself, and if Subscriber does provide it, the nature and quality of that information.

eSIM.club will always be open and honest about the way in which eSIM.club manage personal identifiable information.

By using the website and services, Subscriber agrees to the collection and use of Subscriber's personal data in accordance with this Privacy Policy. It's important Subscriber understands that by using our services, Subscriber gives to eSIM.club consent to collect, use, disclose, and retain Subscriber's personal data. eSIM.club will never read or listen to the content Subscriber is sharing privately. Subscriber can be sure that eSIM.club will only use Subscriber's information as described in this Policy. If Subscriber does not agree with this Privacy Policy, Subscriber should not use the website or our services.

Personal data eSIM.club collect and purpose for processing of personal data

Personal data means any information relating to an identified or identifiable natural person.

eSIM.club will collect personal data from the Subscriber that is necessary for the purposes of supplying to Subscriber the service Subscriber subscribes to, such as name, postal address, email address, and telephone number. eSIM.club may also collect information about Subscriber's location. This information is based on the cell tower locations used to transmit Subscriber's mobile phone call, or the local country access numbers dialed to use Subscriber's phone card.

In certain jurisdictions, eSIM.club may ask for a government issued personal identification number (ID) in limited circumstances including when setting up a wireless account and activating Subscriber's device as required by law. Except as provided herein, eSIM.club will not provide Subscriber's personal data to any other person unless eSIM.club ask Subscriber and Subscriber agrees, or unless eSIM.club is forced to do so by law.

Processing of special categories of personal data

eSIM.club will not collect or use information revealing Subscriber's racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation, or any other information considered sensitive.

Non-personal Information

eSIM.club may automatically collect non-personal information about Subscriber. This includes but not limited to technical information about Subscriber's mobile device, system and application software, and peripherals, the type of internet browser and IP address Subscriber use and the site which linked Subscriber to the eSIM.club's website. This information is used to assist eSIM.club in providing Subscriber with an effective website.

eSIM.club uses non-personally identifiable information for internal purposes and to help eSIM.club interact with visitors to the website. eSIM.club may also share non-personally identifiable information in the aggregate form with third parties to illustrate trends and patterns. Subscriber cannot be personally identified from this information.

What do eSIM.club use for and disclose Subscriber's personal data

eSIM.club will use Subscriber's personal data for customer service, to provide Subscriber with information that Subscriber may request, and to customize Subscriber's experience on the website or with the service. Subscriber's personal data is used by eSIM.club to respond to Subscriber's requests, process Subscriber's transactions, tailor offerings to Subscriber, and for general internal business purposes.

eSIM.club will use Subscriber's financial information (bank's account number, payment card number and other electronic payment measure's data) to bill Subscriber for products or otherwise process Subscriber's transactions. By making a purchase on the website or using the services, Subscriber consent to eSIM.club providing Subscriber's financial information to eSIM.club's billing service providers (credit card processor Adyen, PayPal) and to such third parties as eSIM.club determines for processing Subscriber's transactions. These third parties may include the credit card companies and banking institutions used to process the transaction. eSIM.club require all third parties to have appropriate technical and operational security measures in place to protect Subscriber's personal data, in line with EU law on data protection rules.

eSIM.club operates businesses in multiple jurisdictions. eSIM.club require all services providers to process Subscriber's information in a secure manner and in accordance with EU law on data protection. eSIM.club utilize standard means under EU law to legitimize data transfers outside the EU. If Subscriber has given additionally Subscriber's consent, eSIM.club may use Subscriber's personally identifiable information to contact Subscriber with information it thinks Subscriber should be interested in. If Subscriber does not want to receive this information, indicate that eSIM.club may not do so at the point on the website, where Subscriber gives eSIM.club Subscriber's personally identifiable information. If Subscriber change Subscriber's mind later, Subscriber may contact eSIM.club through Contact page. Email messages will also provide Subscriber with an opportunity to opt-out of receiving this information. Please note that changes to Subscriber's preferences may not be effective immediately. Please note that Subscriber's removal from these communications will only apply to the processing of Subscriber's data in the future and not to data that have already been processed as provided in this Privacy Policy.

If eSIM.club or part of this company as a eSIM.club department is sold to or merges with, another company, or declares bankruptcy, some or all of the data collected from Subscriber may be transferred to a third party as a result of the transfer of assets. eSIM.club may also disclose Subscriber's data when eSIM.club determines it necessary to comply with applicable laws or protect the interests or safety of eSIM.club or other website or service users.

Legal ground for processing personal data

Legal grounds for processing Subscriber's personal data are:

- processing is necessary for the performance of a contract to which the Subscriber is a party or in order to take steps at Subscriber's request prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which eSIM.club is subject;
- by accepting this privacy policy, Subscriber gives consent for the processing of Subscriber's personal data for sending Subscriber eSIM.club 's information and offers.

If Subscriber does not provide personal data referred in clause 2, eSIM.club will not be able to provide its services to Subscriber.

Community Functions

The website and services may make available to its users chat rooms, forums, message boards, and/or other community functions. Any information Subscriber disclose in these areas becomes public information and Subscriber should exercise caution when deciding to disclose Subscriber's personal, financial or other information.

Personal data security

eSIM.club will take reasonable steps to ensure that the data collected from Subscriber, use or disclose is accurate, complete and up-to-date.

eSIM.club will take all reasonable steps to ensure that the personal identifiable information held about Subscriber is protected from misuse and loss or from unauthorized access, modification or disclosure.

The data Subscriber provides to eSIM.club is protected using SSL (Secure Socket Layer) technology. SSL is the industry standard method of encrypting personal information and credit card details so that they can be securely transferred over the Internet.

eSIM.club will also take reasonable steps to destroy or de-identify Subscriber's personal data when eSIM.club no longer need it and it is not necessary retain data to comply with applicable laws.

Please note that eSIM.club retain personal data till it is necessary to provide eSIM.club services or till eSIM.club have a legal obligation to process it.

To determine the appropriate retention period, eSIM.club consider the amount, nature and sensitivity of the personal data and the purposes for which eSIM.club process it. eSIM.club must also consider periods for which eSIM.club might need to retain personal data in order to meet our legal obligations or to deal with complaints, queries and to protect our legal rights in the event of claims being made.

Subscriber's Data Protection Rights

Under certain circumstances, by law Subscriber have the right to:

- Request information about whether eSIM.club hold personal information about Subscriber, and, if so, what that information is and why eSIM.club are holding or using it.
- Request access to Subscriber's personal data (data subject access request). This enables you to receive a copy of the personal data eSIM.club hold about you.
- Request correction of the personal data that eSIM.club hold about you. This enables you to have any incomplete or inaccurate data eSIM.club hold about you corrected.
- Request erasure of Subscriber's personal data. This enables you to ask us to delete or remove personal data where there is no reason for us continuing to process it. You also have the right to ask us to delete or remove Subscriber's personal data where you have exercised Subscriber's right to object to processing.
- Object to processing of Subscriber's personal data where eSIM.club are relying on a legitimate interest (or those of a third party) and there is something about Subscriber's particular situation, which makes you want to object to processing on this ground. You also have the right to object when eSIM.club are processing Subscriber's personal information for direct marketing purposes.
- Object to automated decision-making including profiling, that is not to be subject of any automated decision-making by us using Subscriber's personal data or profiling of you.
- Request the restriction of processing of Subscriber's personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request transfer of Subscriber's personal data in an electronic and structured form to you or to another party (commonly known as a right to "data portability"). This enables you to take Subscriber's data from us in an electronically useable format and to be able to transfer Subscriber's data to another party in an electronically useable format.
- Withdraw consent . Then you have provided Subscriber's consent to the collection, processing and transfer of Subscriber's personal information for a specific purpose, you have the right to withdraw Subscriber's consent for that specific processing at any time. Once eSIM.club have received notification that you have withdrawn Subscriber's consent, eSIM.club will no longer process Subscriber's data for the purpose or purposes you originally agreed to, unless eSIM.club have another legitimate basis for doing so.

Anonymity

eSIM.club is committed to allowing our customers to conduct their activities through any of the services eSIM.club provide without being required to identify themselves. In some circumstances, such as providing to eSIM.club with credit card details, v eSIM.club obviously cannot deal with you anonymously. However, unless there are good practical or legal reasons that require you to be identified, eSIM.club will give you the option of operating anonymously or pseudo-anonymously.

Cookies, site tracking and links

A cookie is a piece of data temporarily stored on the user's hard drive containing information about the user. A cookie contains Subscriber's contact information and information to allow us to identify Subscriber's computer using eSIM.club services. The cookie helps the user to save time. For instance, by setting a cookie on our site, you do not have to log in using Subscriber's account more than once during each visit, thereby saving time while on our site. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify Subscriber's browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Sometimes, we use tracking software like Yandex.Metrica or Google Analytics to monitor client traffic patterns and site usage to help us develop the design and layout of the websites. This software does not enable us to capture any personal data.

This website may contain links to other sites. Please be aware that eSIM.club is not responsible for the privacy practices of such other sites. This privacy statement applies solely to information collected by this website.

Changes to the Privacy Policy

eSIM.club reserves the right to change the terms of this Privacy Policy. Any changes will be posted on this page. Notification will be sent also by email.