

# PRIVACY POLICY

**Effective date: 1 September 2025**

**Last updated: 14 June 2026**

This Privacy Policy explains how **Wizard Consulting EOOD** (“Wizard Consulting”, “we”, “us”, or “our”) collects, uses, stores, shares, and protects personal data in connection with the website <https://dragon4partners.com/> (the “Website”) and the services made available through it.

Wizard Consulting EOOD is established in Bulgaria and acts as a data controller for the personal data described in this Privacy Policy, unless otherwise stated.

## 1. Data Controller

### **Wizard Consulting EOOD**

2 Dragoy Bolyarin Str.  
2600 Dupnitsa  
Bulgaria

Website: <https://dragon4partners.com/>

Privacy contact: [privacy@wizarde.com](mailto:privacy@wizarde.com)

If you have any questions about this Privacy Policy or the way we process your personal data, you may contact us at the email address above.

## 2. Scope of This Privacy Policy

This Privacy Policy applies to personal data collected when you:

- visit or use the Website;
- contact us through a form available on the Website;
- communicate with us by email, Telegram, or other communication channels;
- apply to join or participate in our affiliate or partner programme;
- use an affiliate or partner account, where applicable;
- enter into a business relationship with us;
- receive marketing or other communications from us;
- otherwise interact with Wizard Consulting in connection with the Website or our services.

This Privacy Policy does not govern websites or services operated independently by third parties, even where links to such websites or services are available through the Website.

## 3. Personal Data We Collect

Depending on how you interact with us, we may collect the following categories of personal data.

### **3.1. Information You Provide to Us**

When you complete a contact or registration form or communicate with us, we may collect:

- your name;
- email address;
- Telegram username or other messenger username;
- telephone number, if provided;
- company or business information;
- country or location information;
- information contained in your message or inquiry;
- information regarding your website, traffic sources, marketing activities, or affiliate business;
- any other information you voluntarily provide to us.

### **3.2. Affiliate and Business Account Information**

If you become an affiliate, partner, contractor, or other business user, we may additionally process:

- account and login information;
- affiliate or partner identification details;
- information concerning campaigns and traffic sources;
- referral, conversion, performance, and statistical information;
- contractual information;
- commission and payment information;
- billing and invoicing information;
- payment or payout details;
- transaction history;
- records of communications with account managers or support personnel;
- information required to prevent fraud, abuse, or violations of our terms.

Where legally required, we may also request information necessary to verify identity, business status, payment entitlement, or compliance with applicable legal requirements.

### **3.3. Technical and Usage Data**

When you access the Website, certain information may be collected automatically, including:

- IP address;
- browser type and version;
- device type;
- operating system;
- language settings;
- date and time of access;
- referring website or URL;
- pages viewed;
- links clicked;
- session information;
- approximate geographic information derived from an IP address;

- cookie identifiers and similar online identifiers;
- technical logs and security information.

### **3.4. Cookies and Similar Technologies**

We may use cookies, pixels, tags, local storage, and similar technologies in connection with the Website.

These technologies may be used to:

- enable essential Website functionality;
- maintain security;
- remember user preferences;
- understand Website usage and performance;
- measure traffic and conversions;
- improve our services;
- support affiliate tracking;
- measure the effectiveness of advertising or marketing campaigns.

Further information is provided in Section 10 of this Privacy Policy.

## **4. Purposes of Processing**

We may process personal data for the following purposes:

### **4.1. Providing the Website and Services**

We process personal data to:

- operate and maintain the Website;
- provide requested functionality;
- register and administer affiliate or partner accounts;
- provide customer and partner support;
- respond to inquiries;
- manage our relationship with affiliates and business partners.

### **4.2. Performing Contracts**

Where you enter into a contract with us, we may process your data to:

- establish and administer the contractual relationship;
- calculate commissions or other payments;
- process payouts;
- maintain account and transaction records;
- communicate regarding the contractual relationship;
- enforce applicable contractual terms.

### **4.3. Security and Fraud Prevention**

We may process personal data to:

- protect the Website and our systems;
- identify suspicious activity;
- prevent fraud, abuse, manipulation, or unauthorized access;
- investigate potential violations of our terms;
- maintain technical and security logs;
- protect our legitimate business interests and the interests of our partners.

#### **4.4. Analytics and Website Improvement**

Where permitted by law, we may process usage information to:

- understand how visitors use the Website;
- monitor Website performance;
- identify technical problems;
- improve Website functionality and user experience;
- analyze the performance of our services and marketing activities.

Where analytics technologies require consent under applicable law, they will be used only after the required consent has been obtained.

#### **4.5. Marketing Communications**

Where permitted by applicable law, we may use your contact details to send information about:

- our services;
- affiliate opportunities;
- promotions;
- commercial offers;
- updates relevant to our business relationship.

Where consent is required, we will send such communications only after obtaining your consent.

You may withdraw your consent or opt out of direct marketing communications at any time.

#### **4.6. Legal and Regulatory Compliance**

We may process personal data where necessary to:

- comply with applicable laws and regulations;
- comply with accounting, tax, corporate, and record-keeping requirements;
- respond to lawful requests from courts, regulators, or public authorities;
- establish, exercise, or defend legal claims.

### **5. Legal Bases for Processing**

We process personal data in accordance with Regulation (EU) 2016/679 (the **General Data Protection Regulation**, or **GDPR**) and applicable Bulgarian data protection legislation.

Depending on the circumstances, our legal basis for processing may include:

### **Consent — Article 6(1)(a) GDPR**

We may rely on your consent, for example, for certain marketing activities or non-essential cookies.

Where processing is based on consent, you may withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing carried out before consent was withdrawn.

### **Performance of a Contract — Article 6(1)(b) GDPR**

We may process personal data where necessary to:

- enter into a contract with you;
- administer an affiliate or partner relationship;
- provide agreed services;
- calculate and process payments;
- perform our contractual obligations.

### **Compliance with a Legal Obligation — Article 6(1)(c) GDPR**

We may process information where this is necessary to comply with obligations imposed on us by applicable law.

### **Legitimate Interests — Article 6(1)(f) GDPR**

We may process personal data where necessary for our legitimate interests, provided that those interests are not overridden by your fundamental rights and freedoms.

Such legitimate interests may include:

- operating and improving our business;
- maintaining Website and network security;
- preventing fraud and abuse;
- managing business and affiliate relationships;
- protecting our legal rights;
- analyzing the effectiveness of our services;
- maintaining accurate business records.

Where required, we assess and balance our legitimate interests against the privacy rights of affected individuals.

## **6. How We Share Personal Data**

We do not sell personal data.

We may disclose personal data to third parties where reasonably necessary for the purposes described in this Privacy Policy.

Recipients may include:

- hosting and infrastructure providers;
- cloud service providers;
- IT and cybersecurity providers;
- CRM and customer support providers;
- analytics providers;
- affiliate tracking and attribution providers;
- email and communication service providers;
- payment and payout providers;
- accounting and professional advisers;
- legal advisers, auditors, and consultants;
- contractors and service providers acting on our behalf;
- public authorities, courts, regulators, or law enforcement authorities where required by law.

We require processors acting on our behalf to process personal data only in accordance with our instructions, applicable data protection laws, and appropriate confidentiality and security obligations.

We may also disclose personal data as part of a merger, acquisition, corporate reorganization, financing transaction, sale of assets, or similar corporate transaction, subject to applicable legal requirements.

## **7. International Transfers of Personal Data**

Some of our service providers or business partners may process personal data outside Bulgaria or outside the European Economic Area (“EEA”).

Where personal data is transferred outside the EEA to a country that has not been recognized by the European Commission as providing an adequate level of data protection, we will use an appropriate transfer mechanism where required by law.

Such safeguards may include:

- European Commission adequacy decisions;
- Standard Contractual Clauses approved by the European Commission;
- other transfer mechanisms permitted under Chapter V of the GDPR.

Where appropriate, supplementary technical and organizational measures may also be implemented.

You may contact us at [privacy@wizarde.com](mailto:privacy@wizarde.com) for further information about safeguards relating to international data transfers.

## 8. Data Retention

We retain personal data only for as long as reasonably necessary for the purposes for which it was collected, including for the purposes of satisfying legal, accounting, contractual, regulatory, or reporting requirements.

The applicable retention period depends on factors including:

- the nature of the information;
- the purpose for which it was collected;
- the duration of our relationship with you;
- applicable statutory retention requirements;
- the need to prevent fraud or abuse;
- the limitation periods applicable to potential legal claims.

For example, account and contractual information may be retained for the duration of our relationship with an affiliate or business partner and for an appropriate period thereafter where necessary to meet legal or contractual obligations or protect our legal rights.

Communication records may be retained for as long as necessary to respond to an inquiry and maintain an appropriate business record.

Technical and security logs may be retained for a period reasonably necessary for security, fraud prevention, troubleshooting, and system integrity.

Where personal data is no longer required, it will be deleted, anonymized, or otherwise disposed of in accordance with applicable law.

## 9. Data Security

We use appropriate technical and organizational measures designed to protect personal data against:

- unauthorized or unlawful access;
- unauthorized disclosure;
- accidental loss;
- alteration;
- destruction;
- misuse.

Measures may include access controls, authentication mechanisms, logging, security monitoring, encryption where appropriate, backups, and limitations on access to personal data.

However, no electronic transmission or storage method can guarantee absolute security.

## 10. Cookies

The Website may use cookies and similar technologies.

### **10.1. Strictly Necessary Cookies**

These cookies are required for the Website to function correctly and securely. They may be used for purposes such as:

- security;
- session management;
- load balancing;
- fraud prevention;
- remembering privacy preferences.

Where these cookies are strictly necessary to provide a service requested by you, consent may not be required.

### **10.2. Analytics Cookies**

Analytics technologies may help us understand:

- how visitors reach the Website;
- which pages they visit;
- how long they remain on pages;
- how users interact with Website functionality;
- whether technical problems occur.

Where required by applicable law, analytics cookies will be activated only after you have provided consent.

### **10.3. Advertising and Marketing Cookies**

Where used, advertising or marketing technologies may help:

- measure campaign performance;
- attribute visits or conversions;
- understand the effectiveness of advertisements;
- limit repetitive advertising;
- support relevant marketing activities.

Such technologies will be used subject to applicable consent requirements.

### **10.4. Managing Cookies**

Where applicable, you can manage your cookie preferences using the consent management mechanism provided on the Website.

You may also configure your browser to block or delete cookies. Please note that blocking certain cookies may affect Website functionality.

You may withdraw consent for non-essential cookies at any time through the available cookie settings, where such functionality is provided.

## **11. Communications Through Third-Party Platforms**

If you choose to communicate with us through Telegram or another third-party messaging or social media platform, that provider may independently process information about your use of its services.

Such processing is subject to the third party's own privacy policy and terms.

We recommend reviewing the relevant provider's privacy information before using such communication channels.

## **12. Your Rights Under the GDPR**

Subject to the conditions and limitations provided by applicable law, you have the following rights.

### **Right of Access**

You may request confirmation as to whether we process your personal data and obtain access to that data.

### **Right to Rectification**

You may request correction of inaccurate personal data or completion of incomplete data.

### **Right to Erasure**

In certain circumstances, you may request deletion of your personal data.

### **Right to Restriction of Processing**

You may request that processing of your personal data be restricted in circumstances provided by the GDPR.

### **Right to Data Portability**

Where processing is based on consent or a contract and is carried out by automated means, you may have the right to receive certain personal data in a structured, commonly used, machine-readable format and to transmit that data to another controller.

### **Right to Object**

Where we process personal data on the basis of legitimate interests, you may object to such processing on grounds relating to your particular situation.

You have the right to object at any time to the processing of your personal data for direct marketing purposes.

### **Right to Withdraw Consent**

Where processing is based on consent, you may withdraw your consent at any time.

Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

### **Rights Relating to Automated Decision-Making**

Where applicable, you may have rights in relation to decisions based solely on automated processing that produce legal effects or similarly significantly affect you.

We do not intend to make decisions based solely on automated processing that produce legal or similarly significant effects unless such processing is permitted by applicable law and appropriate safeguards are implemented.

## **13. How to Exercise Your Rights**

To exercise any of your data protection rights, please contact:

**Wizard Consulting EOOD**

Email: [privacy@wizardc.com](mailto:privacy@wizardc.com)

We may request additional information where reasonably necessary to verify your identity and protect personal data against unauthorized disclosure.

We will respond to requests within the time limits required by applicable data protection law.

There is normally no fee for exercising your GDPR rights. However, where permitted by the GDPR, we may charge a reasonable fee or refuse to act on requests that are manifestly unfounded or excessive, in particular because of their repetitive nature.

## **14. Right to Lodge a Complaint**

If you believe that the processing of your personal data infringes applicable data protection law, you have the right to lodge a complaint with a competent supervisory authority.

The supervisory authority in Bulgaria is:

**Commission for Personal Data Protection (CPDP)**

2 Prof. Tsvetan Lazarov Blvd.

1592 Sofia

Bulgaria

You may also have the right to lodge a complaint with the data protection supervisory authority in the EU/EEA Member State of your habitual residence, place of work, or place of the alleged infringement.

We encourage you to contact us first at [privacy@wizardc.com](mailto:privacy@wizardc.com) so that we have an opportunity to address your concerns.

## **15. Direct Marketing**

Where we send direct marketing communications, you may opt out at any time by:

- following an unsubscribe mechanism contained in the communication, where available; or
- contacting us at [privacy@wizardc.com](mailto:privacy@wizardc.com).

If you opt out of marketing communications, we may still send non-marketing communications that are necessary for the administration of your account, contractual relationship, transactions, security, or other services you have requested.

## **16. Children**

The Website and our affiliate services are intended for adults and business users.

We do not knowingly collect personal data from children through the Website for the purpose of allowing them to participate in our affiliate programme.

If we become aware that personal data relating to a child has been collected unlawfully, we will take appropriate steps to delete or otherwise process that information in accordance with applicable law.

## **17. Third-Party Links**

The Website may contain links to websites, platforms, or services operated by third parties.

We are not responsible for the privacy practices, security, or content of independently operated third-party websites and services.

We encourage you to review the privacy policies of any third-party services before providing personal data to them.

## **18. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time to reflect:

- changes to our services;
- changes to the way we process personal data;
- changes to applicable law;
- regulatory guidance;

- technical or organizational developments.

When we update this Privacy Policy, we will revise the “Last updated” date at the top of this page.

Where required by law, we will provide additional notice or obtain consent before implementing material changes.

## 19. Contact Us

For questions, requests, or concerns regarding this Privacy Policy or the processing of your personal data, please contact:

**Wizard Consulting EOOD**

2 Dragoy Bolyarin Str.  
2600 Dupnitsa  
Bulgaria

**Email:** [privacy@wizardc.com](mailto:privacy@wizardc.com)

**Website:** <https://dragon4partners.com/>