

# Privacy Policy

This Privacy Policy was posted on 01.02.2022 and from thereon becomes effective for new and existing users and visitors of Adtech LLC.

Adtech (referred to as “**Provider**” or “**we**” or “**us**” or “**our**”) a company registered in the Adtech LLC under registration number 44618044 as a limited liability company having its registered office at Odessa, 65059, 34A Admiralskiy Avenue, off. 514, Ukraine, is operating this Platform and services provided therein.

We are committed to protecting and respecting your privacy and handling your personal data in a secure and transparent manner. The personal data that we collect and process may vary depending on the service we provide to you.

This Privacy Policy:

- provides an overview of how Adtech collects and processes your personal data, and informs you about your rights under the EU General Data Protection Regulation (the “GDPR”) and any national law supplementing or implementing the GDPR;
  - Contains important information about, among others, the collection and use of personal data; the legal grounds and purpose for the processing of that data; disclosures of that personal data to third parties.

For the purposes of this Privacy Policy:

- when we refer to “personal data” we mean data which identifies or may identify you as an individual and which may include, *i.e.* your name, address, email, telephone number, date of birth, log data, online identifiers etc.;
- when we refer to “processing” we mean the handling of your personal data by us, including collecting, protecting, use and storing your personal data, and
- when we refer to our “Platform” we mean <https://adtech.com.ua>.

## Our Data Protection Principles

We adhere to the principles relating to processing of personal data set out in the GDPR therefore your personal data shall be:

1. Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency).

2. Collected only for specified, explicit and legitimate purposes (Purpose Limitation).
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed (Data Minimisation).
4. Accurate and where necessary kept up to date (Accuracy).
5. Kept in a form which preserves identification of data subjects for longer than is necessary for the purposes for which the data is processed (Storage Limitation).
6. Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage (Security, Integrity and Confidentiality).
7. Transferred to another country, if necessary, with appropriate safeguards being in place (Transfer Limitation).
8. Made available to data subjects and data subjects allowed to exercise certain rights in relation to their Personal Data (Data Subject's Rights and Requests).
9. Handled responsibly for and accountably for compliance with the data protection principles listed above (Accountability).

## 1. Data Controller

1.1 As an operator of this Platform and the services provided herein we are acting as a data controller with respect to your personal data and determine the purposes and means of the processing of that personal data.

1.2 We will ask you to consent to our use of cookies in accordance with the terms of our Cookies Policy ([hyperlink to the cookies policy](#)) when you first visit our Platform.

1.3 Our Platform incorporates privacy controls you can use to specify whether you would like to receive marketing, limit the publication or any other use of your information. You can access such privacy controls via [support@adtech.com.ua](mailto:support@adtech.com.ua).

## 2. How we collect your personal data

2.1 We obtain your personal data mainly through information you provide directly to us or through information provided by third parties. Below is a list of ways in which we collect your personal data.

Personal data collected directly from you:

- when you complete our registration forms, which are available on our Platform,
- when you enter and use our Platform, and/or performing contractual obligations, and

- when you contact us for any enquiries, complaints or for any other reason.

2.2. When you use our services, log files (activity logs) are automatically transmitted to us. As a general rule, this is not personal data.

#### Log Files

- Time and date of the visit;
- Information about user activity and transferred data volume;
- Server Logs (user agent, IP);

## 3. Personal Data We Use, Purposes and Legal Grounds

### 3.1. Generally we process your data for the following purposes:

- For corresponding with you,
- For advertising purposes such as the dispatch of our newsletter,
- On quality assurance and statistics,
- In order to provide our service,
- For your participation in our surveys,
- In order to improve our service.
- For processing of agreement with you,

### When processing your data, we pursue the following legitimate interests:

- The improvement of our offer,
- The protection of our systems against misuse,
- The production of statistics,
- The storage of our correspondence with you.

3.2. We may collect the following personal data from you depending on the service we provide to you. We will only process your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

<b>Type of Data</b>	<b>Purpose</b>	<b>Legal basis of processing</b>
<p><b>Log Data</b></p> <p>IP address, geographical location, browser type and version, operating system.</p>	<p>To analyse the operation of our Platform and services.</p>	<p>Consent and Legitimate interests.</p>
<p><b>Profile data</b></p> <p>Your name, email address.</p>	<p>Operating our Platform, providing our services, communicating with you.</p>	<p>Consent</p>
<p><b>Transaction data</b></p> <p>Name, email, your card details and/or e-wallet details and/or account number in the payment system, country or region and other transaction details.</p>	<p>The transaction data may be processed for:</p> <p>(a) the purpose of payments and keeping proper records of those transactions;</p> <p>(b) the purposes of fulfilment of our KYC and AML obligations;</p> <p>(c) the proper performance of our payment obligations to you.</p>	<p>Consent and Legitimate interest</p>
<p><b>Notification &amp; Correspondence data</b></p> <p>Name, e-mail, internal user ID</p>	<p>The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. As well as performing the contract we have with you.</p>	<p>Consent</p>

3.3. The provision of personal data is necessary and obligatory. Without the transmission of technically necessary information the presentation and functionality of our Platform and/or services is not guaranteed.

## 4. Information We May Provide to Third Parties

4.1. For the operation of our online presence, our Platform and our services we cooperate with various service providers. In addition, your data will be passed on to parties that are unavoidable for the fulfilment of contractual obligations or where there is a legal obligation to pass them on.

4.2. We may disclose your personal data to the third parties-service providers listed below. When we do so, we require those third parties to have appropriate technical and organisational measures in place to protect your personal data. We will not share any of your personal data for any purpose other than the purposes described in this privacy policy, nor will we sell your personal data to anyone.

Services for the operation of our Platform and services:

- CRM and analytics services
- Customer support software provider
- Email provider

Other services:

- Receivables management
- Support provider
- Newsletter providers
- Payment providers
- Telecommunications provider
- Postal, delivery and forwarding services
- Service provider for bookkeeping and invoicing
- Lawyers, auditors and tax consultants

4.3 We will share the data with the third parties- services providers only to the extent necessary for the purposes of fulfilment our obligations due to you.

4.4. We will share the data with governmental and regulatory bodies, including law enforcement authorities, in connection with enquiries, proceedings or investigations by such parties or in order to enable the Provider to comply with its legal and regulatory requirements.

## 5. International Transfers of Your Personal Data

5.1 Data is being transferred to countries outside the European Economic Area. We only transfer personal data to third countries where the EU Commission has confirmed an adequate level of protection or where we can ensure the careful handling of personal data by means of contractual agreements or other suitable guarantees, such as certifications or proven compliance with international security standards.

- USA (the standart contractual clauses)

## 6. Your data protection rights

You have the following rights in terms of the personal data we hold about you:

<b>The right to be informed</b>	Adtech is publishing this privacy policy to keep you informed as to what we do with your personal data. You can ask us for information regarding any data of yours that we keep at any time. This information concerns, among other things, the data categories we process, for what purposes we process them, the origin of the data if we did not acquire them directly from you and, if applicable, the recipients to whom we have sent your data.
<b>The right to access</b>	This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. You can obtain a copy of your data from us free of charge. If you are interested in other copies, we reserve the right to charge for the additional copies.
<b>The right to correction (rectification)</b>	You can request that we correct your data. We will initiate appropriate measures to keep the data of yours that we continuously process correct, complete, and up to date, based the latest information available to us.

<p><b>The right to erasure</b> <b>(The right to be forgotten)</b></p>	<p>You can request that we delete your data provided the legal requirements have been met. In accordance with Article 17 the GDPR, this can be the case if:</p> <ul style="list-style-type: none"> <li>• the data are no longer required for the purposes they were acquired or otherwise processed;</li> <li>• you revoke your consent, which is the basis of the data processing, and there is no other legal basis for the processing;</li> <li>• you object to the processing of your data and there are no legitimate reasons for the processing or you object to data processing for the purposes of direct advertising;</li> <li>• the data have been processed illegally.</li> <li>• Where the processing is not necessary:</li> <li>• To ensure adherence to a legal obligation that requires us to process your data</li> <li>• In particular with regard to legal retention periods</li> <li>• To assert, exercise or defend against legal claims</li> </ul>
<p><b>The right to restrict processing</b></p>	<p>You can request that we restrict the processing of your data if</p> <ul style="list-style-type: none"> <li>• You dispute the correctness of the data – for the period of time we need to check the correctness of the data;</li> <li>• The processing is illegal but you do not wish to have your data deleted and request a restriction of use instead;</li> <li>• We no longer need your data, but you need them to assert, exercise or defend against legal claims;</li> <li>• You have filed an objection to the processing, though it has not yet been decided whether our legitimate grounds outweigh yours.</li> </ul>
<p><b>The right to data portability</b></p>	<p>At your request, we will transfer your data– where technically possible – to another responsible entity.</p> <p>However, this right only applies if the data processing is based on your consent or is required to fulfill a contract. Instead of receiving</p>

	<p>a copy of your data, you can ask us to send the data directly to another responsible entity that you specify.</p>
<p><b>The right to object</b></p>	<p>You can object to the processing of your data at any time for reasons that arise from your special situation provided the data processing is based on your consent or our legitimate interest or that of a third party. In this case, we will no longer process your data. The latter does not apply if we are able to prove there are compelling, defensible reasons for the processing that outweigh your interests or we require your data to assert, exercise or defend against legal claims.</p>
<p><b>The right to withdraw consent</b></p>	<p>Withdraw the consent you gave us with regard to the processing of your personal data for certain purposes, such as to allow us to promote our products and services to you.</p>
<p><b>The right to complain</b></p>	<p>Adtech takes your rights very seriously. However, if you are of the opinion that we have not dealt with your complaints adequately, you have the right to submit a complaint to the data privacy protection authorities responsible.</p>

We endeavor to address all of your requests promptly.

## 7. Retaining and Deleting Personal Data

7.1 We will keep your personal data for as long as is necessary for the purpose for which we initially collected them. We will also retain your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

7.2 Once the retention period of your personal data lapses, we will ensure that your personal data are either irreversibly anonymised or securely destroyed.

## 8. Confidentiality and Security

8.1 We deploy various security measures such as encryption and authentication tools in line with the current state of the art to protect and maintain the security, integrity and availability of your personal data.

8.2 100% protection against unauthorised access in the case of data transfers across the internet or a website cannot be guaranteed, but we and our service providers and business partners do our utmost to protect your personal data in line with the prevailing data protection legislation by means of physical and electronic physical precautions. Among other things, we use the following measures:

- Strict criteria for authorisation to access your personal data on a “need-to-know” basis only and exclusively for the specified purpose;
- Transfer of acquired data in secured form;
- Storage of confidential data in our secure servers;
- Firewall safeguarding of IT systems to provide protection against unauthorised access, and
- Continuous monitoring of access to IT systems to detect and prevent the misuse of personal data.

8.3 If you have received a password from us in order to be able to access certain parts of our Platform, you are responsible for keeping this password confidential and for compliance with all other security procedures which we make you aware from time to time. We ask you not to share your password with anyone.

8.4. Our services are not specifically aimed at children and teenagers under the age of 18. If we become aware that a child has submitted information to us, we delete this information immediately. We encourage parents to instruct their children to never give out their real names, addresses, or phone numbers, without permission, when using the Internet.

8.5. Our Platform and/or services may contain links to other websites or applications for whose content, function and compliance we are not responsible. Please inform yourself about the data protection regulations of the respective web pages with the respective operators.

## **9. Cookies**

9.1 Our Platform uses cookies to distinguish you from other users of the Platform and provide contractual obligations in a high-quality level. This helps us to ensure its smooth operation in order to improve your experience. Please get acknowledged with details of our Cookies Policy here [URL].

## **10. Changes to this Privacy Policy**

10.1 We may update this Privacy Policy from time to time by publishing a new version on our Platform.

10.2 We will notify you appropriately when we make changes to the Privacy Policy and we will amend its revision date so that you know when we last amended it. We do however encourage you to review this statement periodically so as to always be informed about how we are processing and protecting your personal information.

10.3 We may notify you of changes to this Policy by email or through the private messaging system on our Platform.

# 11 Contacts

11.1 If you have any questions about our Privacy Policy or wish to obtain more details in relation to the personal data, we process about you, or wish to exercise any of your rights set out in Section 6, please contact us via Contact page or via Live chat or email us [support@adtech.com.ua](mailto:support@adtech.com.ua).

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