

Privacy Policy

LAST UPDATED: [01] [07], 20[20]

This Policy explains:
- how we collect and process your personal data;
- your legal rights as to your personal data.

Please, note!
In order to use our services (the website), you must agree to these terms and conditions.

Definitions
You may find the vocabulary of the definitions we use in the end of this Policy.

If you are under 18, please stop using our Site.

*You may **contact us** if you have any **questions** or **concerns** not addressed to in this Policy.*

*We are available by **email** or by **phone**.*

We collect:

- your login
- your email address

We do not use automated decision-making.

Be careful with your data on your health, biometrics, trade union

Introduction

This Privacy Policy ("**Policy**") is effective as of the date set forth above. ("**We**", "**Us**", "**Our**" and so on) is committed to honoring and encouraging the protection of your privacy (both our **Users**, who are registered, and **Visitors**, who browse the Site without registration).

This Privacy Policy describes how we collect and use the personal data (personal information) you provide us with through your use of the website (referred to as our "**Site**").

When you (as the User or as the Visitor) submit your personal information to the fields and forms or at the request and commands pushed through our Site, you expressly consent to our collection, use and disclosure (if necessary) of your personal information as explained in this Policy.

This Policy addresses activities the Company is conducting and the services offering on our Site.

This Policy does not apply to our partners mentioned on the Site.

We cannot control employees and contractors engaged by our partners. If you visit another site, which mention of, integrated API of or link to is placed on our Site, another person or entity may collect and use your personal information. Be sure to check their privacy policy before accepting their terms or services.

Please remember that **you must reach the age of 18 before deciding on using our Services.**

You should print a copy of this Policy for your records.

Data We Collect

We do not knowingly or intentionally collect any data on our Visitors. We may collect some data as a result of your query or other contact with us.

1. Information we ask you to provide us with

Account setup (creation or update of your account):

- ◆ Login
- ◆ Email address

membership, political opinions and other sensitive topics.

Cookies help us identify your device and enhance your user experience, so we may be sure your application or web version of the site works properly.

You may opt out, i.e. refuse to be tracked by cookies. We do not guarantee that the Site will work properly in this case.

Here you may find a list of the purposes we collect your data for.

We do not disclose your personal data unless we are legally compelled to do so or unless you consented to such disclosure.

Be aware that we will process your data in accordance with this

Later you may need to fill in the profile with the supplementary details:

- ◆ [...]

2. Information you provide us with

When you enter into negotiations with us or contact us to resolve a query related to the Site, we may collect the data you intentionally disclose to us. We will use it in order to get in contact with you and/or assist you in case of your request aiming at exercising your data subject right.

We treat the information as true data about you. We use these data in order to facilitate the communication between us, and provide you with the Site functionality. Please, do not post or add on your profile any information you do not want to be publicly available.

We do not run any automated decision-making devices or software including those based on all the data aggregated. However, we may apply the respective sanctions if we discover you are violating this Policy.

We do not receive any personal data on you when you visit the links placed on Site or use the services accessible via API. All the data you fill in there or provide our partners with is under their responsibility and is collected, used and disclosed pursuant to their privacy policies. Please, check their privacy policies before accepting their services.

We will additionally ask for your consent in case we need your data for the purposes not described in this Policy.

Cookies and Third-Party Technologies

Cookie is a small piece of data sent by the web-server to be stored by your device. Cookie may contain your unique identifier (see **Information created when you use our Site**) and typically serve to improve your experience of Internet surfing: for instance, due to cookies, you are able to browse pages you have once visited quickly, to set your unique options in “settings” menus, as well as monitor your way through the webpages in order to aggregate precise information about your navigation and preferences, so the site owners may analyze the information and offer you a better service and relevant ads in the future.

We do not use cookies collecting your personal data. Cookies of our Partners are subject to these Partners’ privacy policies.

How We Use Personal Data

Our Purposes

Our Site is aimed at informing you on our Service. Thus, we do not usually need your data as a Visitor. But we may process your data as User after registration. We will typically use your personal data you disclosed to us if you apply for a support or request to exercise your data subject right.

As we mentioned in **Data We Collect**, we will use your personal data for the following purposes:

- ◆ Creation of your profile on our Site, if agreed on by the Company and the User;

Policy as far as we retain ownership over the Site.

- ◆ Providing you with the required support in case of any queries and questions regarding the Site;
- ◆ Providing you with the information as to our Service offered via the Site;
- ◆ Complying with applicable law
- ◆ Obeying the requests and court or other authority decisions
- ◆ Technical and related support
- ◆ Statistics and analytics (if any data is collected)

Disclosure of Your Personal Data

The Company cannot be responsible for the use of any personal information that you disclose via the Site or during the direct contact with our team. You shall be aware of the information you share through the Site or conversation with the Company and its representatives, and thus you should post or disclose it carefully.

We ensure we always include the controls and warranties embodied in this Policy to the contracts and agreements we enter into with our partners and contractors whom we grant access to your personal data to.

Winding-Up, Bankruptcy or Company Purchase

In case our company is sold, is in the process of the merger or acquisition with another company, or is subject to winding-up regardless the cause, we ensure the respect for your privacy by applying this Policy to the personal data we have collected up to the moment of transfer of controllership over our company or its cease of activity and the following sale of assets if the latter takes place.

We will warn you about the next steps we are to pursue to protect your privacy, if such an occasion arises.

Grounds for Processing

We promise that we use the personal data we've obtained from you or on your behalf in a way that does not outweigh your rights and freedoms.

Despite this, we must comply with the GDPR requirements to the legal grounds for processing. The GDPR allows us to collect and process your personal data on the grounds as follows:

The processing is necessary to provide you with the Services and features available through our Site

To achieve this purpose, we may need Your registration information (such as login, email).

The processing is necessary to fulfill our legal obligations

The applicable laws depending on the relationship between you and our company may affect:

- ◆ the scope of personal data we collect,
- ◆ ways we process your personal data in,
- ◆ our ability to keep the confidentiality of your data and avoid their disclosure,
- ◆ duration of the planned retention, etc.

Where processing is necessary to protect the vital interests of individuals or public policy, we cannot refuse to provide the copies of your personal data we have collected or may have access to within the

In general, our grounds for processing are:

- ◆ *the necessity to fulfill our obligations under our contract embodied in the Terms or to form the contract with you;*
- ◆ *the obligation to fulfill our legal obligations imposed by the laws and/or state authorities;*
- ◆ *work on the enhancement of the user experience, safety, security and other legitimate interests we may pursue;*
- ◆ *your consent.*

functionality of the Site to the authorities and enforcement agencies in case of receipt of their legitimate decision or demand to do so.

The processing is necessary to secure our or third parties' legitimate interests

We may use the personal data we do collect and process (including yours) in order to maintain and enhance our user's safety and security, enabling or administering our business (quality control, consolidated reporting, customer service), transfer of ownership and so on.

Also, we will report to the police or other competent enforcement agencies in case we discover fraud or any other violations of the applicable law or suspicious behavior or actions committed on behalf of your account.

Pursuant to and as limited by your consent

We will notify you if we need to process your personal data for the purposes other than mentioned above. We will keep you informed and ask you to consent to such processing if it is needed.

Your Age

We reserve the right to implement any tools and techniques to reveal the impersonation, fraud and other crimes, and report them immediately to the appropriate state authorities and enforcement agencies, including the personal data associated with the activities which, at our own discretion, are suspicious and may raise concerns about their association with the violation of applicable laws.

We do not intend nor knowingly collect and process personal data of minors. We rely on the personal data we've receive from data subjects (including data as to a User's age and legal capacity).

By using or accessing our Site, you acknowledge that you are at least 18 years old and have all rights to enter into an agreement with us as to the receipt of Services and use of Site, as well as you give us the consent to collect and process your personal data for the purposes we mention in this Policy.

We appreciate your awareness as to the presence of minors (i.e. any persons under 18) among our Site users. If you know that we process personal data of individuals under 18 years old, please inform us by sending email.

Retention of Personal Data

We will store and process your personal data as long as your account is activated or the contract is valid and until the end of the retention period required by applicable law (i.e. for tax purposes). We will delete your personal data from our databases and request our processors to delete your personal data, too, upon your request for deletion of your account via the functionality of the Site or by email .

We may retain your personal data for a longer period or despite your request for erasure if its storage is justified by legal obligation or our legitimate interest to do so (i.e., your account has been previously noticed or suspected in participation in the fraudulent schemes, botnet, etc.).

You may request deletion of your personal data at any time by sending us an email at Executing your request, we will delete or anonymize any

You must be at least 18 years old to use our Site or App.

Please report any cases related to the use of our Site or App by minors.

We retain your data as long as you are active or the contract or law compels us to.

We may keep your personal data in case we have serious legal grounds to do so.

We will delete your personal data in case you stop using our Site for a few months.

Be careful while accessing links you are provided with within the Site!

Any data you disclose behind the link is collected and processed by the owner of the site available at the link you have previously accessed. Do not forget to read their Privacy Policy.

We must disclose your personal data in case a state authority will ask as to, provided the appropriate decision is put in place.

Sometimes we may disclose your data to third parties. But in this case we use NDAs and other tools to safeguard your privacy.

Our home is Estonia.

We use cloud services demonstrating their compliance with the latest standards of data privacy and security.

data that is not mandatory to be retained. Sometimes we may be unable to delete your account or personal data (for instance, in case of unsettled or unresolved dispute or claim, or in case we suspect you in being associated with a crime or other violation of applicable law, e.g. fraud, unsafe behavior, security incident). Upon the resolution or settlement of claim, conclusion of a criminal or administrative proceeding, or learning that our suspicion is unjustified, we will delete your personal data.

Data Sharing and Disclosure

Provided that we have your personal data, we may share the personal information we collect about you. Here we provide you with the list of our partners and third parties we share your personal data with.

Our subcontractors, service providers and business partners

We may grant access to your personal data, in full or in part, to our subcontractors, service providers and business partners. We implemented a need-to-know approach to range the scope of access granted to each category depending on the operations they ensure and purposes they need the personal data for.

Our subcontractors, service providers and business partners may include, for example:

- ◆ payment processors,
- ◆ cloud services providers,
- ◆ marketing and advertising platform providers,
- ◆ data analytics providers,
- ◆ development services suppliers,
- ◆ vendors assisting us in enhancement of the safety and security of our Site,
- ◆ auditors, accountants, lawyers and other professional service providers.

State authorities, enforcement agencies, courts

We may be legally obliged to disclose your personal data to the competent state authority, enforcement agency or a court in case we receive a mandatory request for such disclosure from them.

As we warned you earlier, we may be proactive and address the competent authority in case we suspect a violation of law to be committed in association with your account or persona via our Site or App.

Your consent

We will notify you of the purposes and scope of the disclosure and ask for your permission in case your personal data is to be shared with a third party not mentioned in this Policy.

Cross-border Transfer of Data

Our headquarters is in Estonia. We process and store your personal data using the Hetzner Online web hosting services. The servers are situated in Germany and Finland. You may check Hetzner's data security compliance here:

<https://www.hetzner.com/rechtliches/system-policies/>

<https://www.hetzner.com/rechtliches/datenschutz/>

The cloud service provider and its headquarters are as follows:

Hetzner Online GmbH
Industriestr. 25
91710 Gunzenhausen
Germany

Tel.: +49 (0)9831 505-0

Fax: +49 (0)9831 505-3

E-Mail: info@hetzner.com

Margit Müller is the data protection officer, data-protection@hetzner.com.

We implement suitable security measures to protect your privacy and increase the level of your safety and security of your personal data we use to provide you with the Services.

Some data may be accessed and processed within the territory of Ukraine and Russia. In order to secure the adequate level of protection, we implemented the Standard Model Clauses in the relationships with the engaged contractors based in Ukraine and Russia, so they are bound to preserve at least the same level of personal data protection as it is granted by the law applicable to us.

Your Rights

Rights under the GDPR

The GDPR reserves a scope of rights you may enjoy as to personal data protection. The list of rights protected by the GDPR is as follows:

- ◆ right of access (i.e. you may ask us to send you a copy of the data about you that we collected);
- ◆ right to rectification (i.e. you may ask us to correct the outdated or false data, or complete the data which is missing or incomplete)
- ◆ right to erasure (i.e. you may ask us to delete the personal data we retain, provided that the GDPR allows you to do so);
- ◆ right to restriction of processing (if processing may be restricted under the GDPR)
- ◆ right to object to processing (if the GDPR reserves your right to object as to certain kinds of processing or in certain circumstances)
- ◆ right to data portability (i.e. you may ask us to transfer a copy of your data to another organization or to you provided that the circumstances comply with the GDPR).

Please remember that we do not charge any fees in relation to exercising your rights protected by the GDPR. We typically do our best to answer you as soon as possible or within the reasonable period taking into account the complexity of the request, but in case we are processing a large amount of requests the answer may take us longer than you might expect.

You can send us the request via email, via the telephone number or via mail at the address Harju maakond, Tallinn, Lasnamäe Linnaosa, Punane tn 56, 13619. Please verify that your request comprises the details:

- ◆ your name,
- ◆ contact information,

You are free to enjoy your rights under the GDPR which are as follows:

- *right of access;*
- *right to rectification;*
- *right to erasure;*
- *right to restriction of processing;*
- *right to object to processing;*
- *right to data portability.*

We do not charge fees for answers or processing of your complaints.

Remember that you may withdraw your consent at any time.

- ◆ right you want to exercise, and, *where applicable*,
- ◆ your personal data in our processing,
- ◆ reason/justification behind such request.

Right to Withdrawal of Consent

The GDPR reserves your right to withdraw consent to processing of your personal data.

You may enjoy this right at any time you wish. Please remember, that the withdrawal of consent does not mean that the processing before the withdrawal is considered thus illegal.

We will verify your withdrawal of consent within 72 hours since the receipt of your request.

Data Protection Authority

In case you are convinced we are somehow infringing your personal data rights granted by the GDPR, you may lodge a complaint with the supervisory authority.

Our Data Protection Authority is in Estonia.

We would highly appreciate if you address us prior to lodging a complaint with the DPA. We are here to make your experience as pleasant as it shall be.

The Policy may be changed time to time.

Please read it regularly to ensure you are not missing anything.

In case you forget what the terms we use in this Policy mean, we have this short vocabulary.

Updates to the Privacy Policy

We may occasionally update this Policy. If we make significant changes, we will notify you of the changes on our Site or through others means, such as email. To the extent permitted under applicable law, by using our Site or our Services after such notice, you consent to our updates to this Policy.

We encourage You to periodically review this Policy for the latest information on our privacy practices.

Definitions

“We” means the company mentioned in Data Controller.

“You” means you as the User or a Visitor of the Site regardless your data is processed or not.

“Personal data” means any information relating to you and helping identify you (directly or indirectly), in particular by reference to an identifier such as your name, identification number, location data, an online identifier or to one or more factors which may enable a third person to identify you as a natural person.

“Data subject” means you and any living individual who is the subject of personal data held by us, including users of our Site and even our employees.

“Controller” means a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

“Processor” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

“Processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“Sensitive data” (also: **Special categories of personal data**) means personal data revealing 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 you, data concerning health or data concerning your sex life or sexual orientation.

“Site” means the website accessible at the link.