

# Private Joint Stock Company "Center of Computer Technologies "InfoPlus"

PRIVACY POLICY OF JSC "INFOPLUS"

This document clarifies the practices of collecting and processing personal data provided by persons (hereinafter referred to as the User or you) in connection with access to the website askod.ua (hereinafter referred to as the website) owned by the Private Joint Stock Company "Center for Computer Technologies "InfoPlus", EDRPOU 16400836, registered at 02002, Kyiv, st. Metropolitan Andrey Sheptytsky, 4a (hereinafter referred to as JSC "InfoPlus", the Company or we, us and ours).

If you do not agree to the terms of this Privacy Policy, please do not access or use the websites of JSC "InfoPlus".

#### **ENTRY**

We understand the importance of protecting your privacy and personal data and apply the highest standards of internal security measures and the latest technology to ensure that the data we collect from you is handled and stored securely and to ensure that your data is protected from unauthorized or unlawful processing and from accidental loss, destruction or damage.

#### **COLLECTION OF INFORMATION**

JSC "InfoPlus" collects information in order to provide better services to its users and to better understand visitors to its websites and what content they are interested in. When you access the website, we may collect and further process the following categories of data:

- Information requested when making inquiries to our Company (e.g., your name, email address, company name, country, etc.).
- Information that we may collect through automated means, such as IP address, browser type, provider, referring/exit pages, platform type, date/hour stamp, number of clicks, domain name and country/state of all visitors to InfoPlus websites.
  - We do not collect any information that could identify you without your permission.
- Please note that we use Google Analytics on our website to analyze and improve the performance of the website. If you want to know more about Google Analytics and his Policy "Don't track", Visit Page\_
   https://www.google.com/analytics/terms/us.html
- The period during which we store the information provided by you depends on the type of information, the purpose of its use, etc. As a general rule, we store your personal information for the time necessary to fulfill the purposes set out in this Privacy Policy, provide the services you ordered, etc.
- Except as required by law, the websites of JSC "InfoPlus" do not collect any special categories of personal information about you (this includes information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). JSC "InfoPlus" does not collect any information on criminal convictions and offenses.

We collect and process the above-mentioned data in order to fulfill our obligations to you and pursue legitimate interests, namely:

- providing access to the website and services provided by the Company;
- informing you of any changes and updates to the services we provide;
- compliance with applicable laws:

- provision of additional or related services;
- to provide marketing activities (send you news, updates, promotions, product information, event announcements, etc.);
  - improving the performance and functionality of our services;
- respond to inquiries you have sent to our Company; The above list may be updated depending on the development of services.

### PROCESSING OF PERSONAL DATA

Your personal data may be collected and processed:

• By the Company, within the framework of our internal systems, processes, relevant technical and organizational measures, in a manner that meets the requirements of safety standards and regulations;

and/or

- service providers and processors who have access and the right to use data only to the extent necessary to fulfill the obligations transferred to them by the Company (hereinafter referred to as the Subprocessors).
- These Sub-Processors perform tasks on our behalf and are contractually obligated not to disclose or use the information collected for any purpose other than those specified in this Policy, and may store and assist in facilitating the technical aspects of our services or perform functions related to the administration of services (collection and analysis) or as otherwise defined by the provisions of the contract.
- You expressly agree that the Company may, at its sole discretion, engage Subprocessors who comply with technical and organizational measures in a manner that complies with the requirements of the Law, the Regulations and the security standards provided for in this Privacy Policy and additionally with the policies applicable in the Company.
- If such Sub-Processors are located outside the Swiss Confederation or the European Union (hereinafter referred to as the EU) or the European Economic Area, the processing of personal data is or will be carried out in accordance with applicable law.
- Subprocessors are solely responsible for their acts and omissions, and for all obligations imposed on them. The Company shall not be liable in the event that information is disclosed as a result of a breach or non-compliance with the security of any such Sub-Processors, or in the event of non-compliance by the Sub-Processors with the above requirements.

#### **INCIDENT REPORTING**

- If the Company becomes aware of any breach of our security that results in the accidental or unlawful destruction, loss, alteration or unauthorized disclosure or access to (except for unsuccessful attempts or actions) of users' personal data on a system operated or otherwise controlled by us, we will notify you immediately and without delay in accordance with the procedure provided for in the relevant Law and Regulation.
- A notification will be sent to your e-mail address. It is solely the User's responsibility to provide us with an e-mail address and to keep this address valid and up-to-date.
- None of the data incident reports received from the Company can or will be construed as an endorsement of any error or liability with respect to data incidents.

# YOUR DATA PROTECTION RIGHTS

You can exercise your rights as a data subject at any time, namely:

Right to information: You can contact us with a request for information regarding the processing of your personal data. You must make your request clear so that we can provide you with the necessary information as soon as possible. Upon request, we will provide you with a copy of the personal data that is the subject of the processing. Please note that in certain cases defined by law, your right to receive information may be restricted;

- Right to rectification: You have the right to have inaccurate or out-of-date personal data rectified. In addition, you have the right to complete any of your personal data that is incomplete;
- Right to erasure: You have the right to have your personal data erased. Your right to erasure of your personal data depends, in particular, on whether it is necessary to retain your data at that time in order for us to comply with our statutory obligations;
- Right to restriction of processing: You have the right to request the restriction of the processing of your personal data;
- Right to withdraw consent: You have the right to withdraw your consent to the processing
  of your personal data at any time. Withdrawing your consent will not affect the lawfulness of any
  data processing that was carried out by us prior to your withdrawal, nor will it affect the processing
  of your personal information that is carried out on the basis of lawful processing grounds other
  than consent.

If you wish to access, correct, update, or request deletion of your personal information, you may do so at any time by contacting our Company. You have the right to opt out of marketing communications sent to you by JSC "InfoPlus" at any time. You can exercise this right by contacting us.

Similarly, if JSC "InfoPlus" collects and processes your personal information on the basis of your consent, you can withdraw your consent at any time You have the right to lodge a complaint with the data protection authority regarding the collection and use of your personal information, JSC "InfoPlus". For more information, please contact your local data protection authority.

You will not have to pay to access your personal information (or to exercise any other rights). JSC "InfoPlus" tries to respond to all legitimate requests within one month. Sometimes it may take longer if your request is particularly complex or you have made multiple requests. In this case, we will notify you.

#### COOKIE

You can set your browser to refuse all or some of your browser's cookies, or to warn you when websites set or access cookies. If you disable or refuse cookies, some parts of the websites of JSC "InfoPlus" may become inaccessible or not work properly.

#### LINK

The websites of JSC "InfoPlus" contain links, plugins and applications to various third-party websites. Clicking on these links or enabling these connections may allow third parties to collect or share data about you. JSC "InfoPlus" does not control the content, privacy policy or reliability of such third-party connections and is not responsible for them. We encourage you to read the privacy notice and privacy policy of every website you visit.

## **CHANGES TO THE PRIVACY POLICY**

JSC "InfoPlus" reserves the right to change or amend this Privacy Policy from time to time at its sole discretion. The changes can be viewed here or elsewhere on the websites of JSC InfoPlus. Your continued use of our Company's websites signifies your acceptance of those changes.

This version was last updated on November 15, 2021, historical versions of the Privacy Policy can be obtained by contacting us.

# **ЗГОДА**

By using the website, you consent to the collection, processing and receipt of your personal data as described in this Privacy Policy.

## **CONTACTS**

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