

EXFRAME OU PRIVACY POLICY

This Privacy Policy, alongside our User Agreement, governs the collection, processing, and use of your Personal Data. As mentioned in this Privacy Policy, "ExFrame OU", "we", "us" or "our" refers to ExFrame OU, a company registered under number 14929521, with its registered address: Tallinn, Estonia, Rävåla pst 8, 10143, is a data controller in accordance with this Privacy Policy, which sets out how the company, as a data controller, may use your Personal Data.

Pursuant to the Estonian Personal Data Protection Law No. RT I 2007, 24,127 (the "Law"), any questions regarding this policy should be directed to ExFrame OU at the following address: Tallinn, Estonia, Rävåla pst 8, 10143.

ExFrame OU and its affiliates undertake to do their best to protect your privacy and use the information collected about you to fulfill their contractual obligations and improve customer service.

Please read this document carefully to understand our position and policy regarding your Personal Data and how we will use it.

1. WHAT DATA WE COLLECT ABOUT YOU

We may collect and process the following data about you:

Information that you provide to us

You can provide us with information about yourself by filling out the appropriate forms on the website or by providing such information to us by phone, email, videoconference or by any other means. This information includes personal data specified when registering on the website at the time of filling out the User's questionnaire, as well as the payment instruments used by them, searching for a product, using any of the services that our website provides, when participating in discussions or any other functions for communication on our site, while participating in contests, promotions or surveys, and when you inform us about problems or problems with the site. For example, the data you provide to us may include your name and surname, your photos; your videos, your residential address; your citizenship, your tax residency, your phone number, your email address, your bank details, including account numbers and details of payment instruments, your date of birth, your education, your experience and current place of work, your sources of income and their amount.

Information that we collect about you

Each time you visit our website and use our services, we may collect data about you (including automatically), which for example may include the following information:

technical information, including the Internet Protocol (IP) address used to connect your computer to the internet, your login details, browser type and version, time zone settings, browser plug-in types and versions, operating system and platform; data about your visit to the site: including full information about the uniform locator of the resource position (URL), the route of page transitions on the site and when switching to / leaving the site (including date and time), about the products that you viewed or searched for, page response time, errors data downloads, length of time spent on certain pages, activity on the page (information such as scrolling and mouse movements, clicks), methods used to exit the page, as well as phone numbers that were used to contact the customer support center;

information about your geolocation. We may collect real-time location information from your device anytime you download or use our services. We may use this information to optimize our services.

general financial information and information specifically concerning the use of the services and opportunities provided by our website, including information about the transactions being conducted and their participants.

Information that we receive from other sources

We may obtain information about you if you use any of our other sites or our other services. We also work closely with third parties (including our business partners, subcontractors for the provision of technical services, payment services, support services, advertising networks, analytics/information retrieval providers, credit agencies) and may also receive information about you from them.

2. USE OF COOKIES

Cookies are usually stored on your computer's hard drive and help us identify your computer among others.

We may also use cookies stored in emails to help us confirm your receipt and response. We may also use a service provider(s) that may place cookies on your computer's hard drive and receive the information we select, to provide us with data on how our users and visitors navigate our site, what pages of the site they view, as well as data with general information about transactions.

The information collected from cookies is used to evaluate the performance of our site, analyze trends, identify problems our visitors may encounter when accessing our site, and preform administrative duties for the platform. We need this information to improve the quality of our service.

You agree that we may use the browser function known as "cookie" for the purposes stated above.

3. HOW WE USE YOUR PERSONAL DATA

We will use your Personal Data for the following purposes:

to fulfill the obligations under any contracts concluded with you, as well as to provide you with the information, products and services you have requested;

for verification and certification of the identity of the user;

to comply with the requirements of the legislation on the prevention of legalization (laundering) of income from crime, or the financing of terrorism;

to inform you about our other products and services, similar to those products and services that you have already purchased or information about them for which you were looking for;

to provide you with information about goods or services that we think you might be interested in, by us or by third parties designated by us. If you are already our client, we will contact you by electronic means of communication (by e-mail or via SMS) to inform you about products or services similar to those that were the subject of a previous sale or negotiation;

to inform you about changes related to our services;

to ensure that the content of our site is presented to you in the most efficient way and that it can be accessed from your computer;

to administer our site as well as to conduct internal operations, including troubleshooting, data analysis, testing, statistics collection and conducting surveys;

to improve our site and to make sure that our content is as accessible as possible for your computer's operating system;

to provide you with access to the interactive features of the site should you wish to use them;

to ensure the security of our website, our services, and your accounts;

to evaluate and understand the effectiveness of the advertising materials that we provide to you and other users, moreover, to provide you with the advertising information you need;

to provide support, respond and resolve your complaints and questions related to the use of our services and the functionality of our site.

4. DISCLOSURE OF YOUR PERSONAL DATA

We may transfer your Personal Data to any member of our group, which may include our subsidiaries and affiliates.

We may transfer your Personal Data to third parties, such as:

business partners, suppliers and subcontractors, in order to fulfill the obligations under the contracts that are agreed upon with them or with yourself;

advertisers and advertisement networks that ask for certain data to provide important advertising information to you and other users. We do not disclose the identity of our users, but only provide aggregated information (for example, we may report that 500 women under the age of 30 clicked on a certain ad on a certain day).

We may also use aggregated information to help advertisers reach a specific target audience (for example, women living in a specific area). We may also use the information we collect about users in order to meet the advertiser's requests and show advertising materials to a specific target audience;

analytics and search providers that help us improve and optimize our website. We may also disclose your Personal Data to third parties in the following cases:

if we sell or buy any business or assets. Users' personal data may be disclosed to a potential buyer or seller;

if ExFrame OU or all of its assets are redeemed by a third party, the personal information of users will be transferred as one of the assets;

if we are obliged to disclose or transfer the User's Personal Data in accordance with any applicable law or in compliance with the decisions of the relevant courts, requests of judicial and law enforcement agencies, or are forced to compel users to comply with the terms of agreements concluded with us; in case you need to protect your own rights, your property, our users or others. This includes exchanging information with companies and organizations in order to prevent fraud and reduce the likelihood of a default.

5. SECURITY AND STORAGE OF PERSONAL DATA

We use security measures to maintain the confidentiality of your Personal Data and to protect it from loss, misuse, alteration or destruction. Only authorized personnel of ExFrame OU have access to your Personal Data, and these employees are required to treat this information as confidential. The existing security measures will be reviewed from time to time in accordance with new legislation and technical innovations.

The information we receive from you may be transferred and stored outside the European Economic Area (EEA). Information about you may be processed by our employees or employees of service provider companies located outside the EEA. When storing or otherwise processing information by such third parties outside the EEA, we guarantee that we will notify such third parties of our obligations under this Privacy Policy and enter into a relationship with them, provided that they will be obliged to act with respect to your Personal Data, no less strictly than this Privacy Policy binds us. These employees may, among other things, process your requests, billing information and provide technical support. By providing us with your Personal Data, you consent to the transfer, storage and processing of your Personal Data. In turn, we will take all necessary measures to ensure that your personal data is processed in compliance with the security rules and in accordance with the provisions of this Privacy Policy.

Unfortunately, the transmission of information via the Internet cannot be completely secure. Although we make every effort to protect your Personal Data, we cannot guarantee a secure process for transferring your data to our site. In this regard, you are solely responsible for possible failures when transferring your data to the site. After receiving your Personal Data, we undertake to take all the necessary technical measures to protect it against unauthorized access.

6. BASIS FOR PROCESSING PERSONAL DATA

We collect and process your Personal Data only when we have a legal basis for such processing. Legal grounds include your registration as a User and filling out the questionnaire, the contract (in cases where processing is necessary to fulfill the terms of agreements between you and ExFrame OU, and the fulfillment of obligations required by law (in cases where is obliged ExFrame OU to request/receive, process, and store your Personal Data in order to comply with the requirements of applicable law, such as legislation related to legalization (laundering) of proceeds from crime, terrorist financing, and legitimate interest (for example, in cases where processing is necessary to protect you or us from certain threats (fraud , security, etc.), compliance with the provisions of applicable law, the proper level of our business (quality of services provided, identification of needs, preparation of reports), conclusion and execution of corporate transactions (sale of shares / shares, mergers, acquisitions), and others).

In cases where the basis for data processing is given consent, you have the right to withdraw it at any time.

7. YOUR RIGHTS

By contacting us, you can exercise your following rights:

- the right to delete your data (its entirety or a part of it);
- the right to change or rectify your data, in particular when the details are incorrect;
- the right to object or restrict the processing of your data;
- the right to access your data and/or a copy of your data that you have provided to ExFrame OU in a machine-readable format.

Please note that the exercise of some of your rights, depending on the situation, may limit, complicate or completely exclude the possibility of further cooperation.

Our site may contain active links from or to the sites of partner organizations, advertisers, and affiliated companies. If you click on any of the active links, please note that other sites have their own privacy policies,

and we are not responsible for the provisions of these policies. Please read the privacy policies of these sites before transferring your Personal Data to them.

7. ACCESS TO PERSONAL DATA

The Estonian Data Protection Act 2007 gives you the right to access the information stored about you. You can exercise your right to access under the Law. Each such request for access may be subject to a fee in accordance with current legislation.

8. STORAGE OF PERSONAL DATA

We will only retain your Personal Data for as long as we need it, considering the purposes described in this Privacy Policy and our own legal and regulatory requirements. In accordance with our record keeping obligations, we will retain account information and all Personal Data for at least five years from the date you close them.

We may access or store your Personal Data for a longer period if it is the subject of an official request or legal obligation, government investigation or investigation for possible violations of our terms or rules, as well as in other cases to prevent possible harm based on our reasonable considerations.

9. CHANGES TO THE PRIVACY POLICY

Any changes made to the Privacy Policy will be published on this page and, if necessary, sent to your email address. Please review the information regularly in order to familiarize yourself with the changes in our Privacy Policy.