

PRIVACY POLICY

INTRODUCTION

This Privacy and Cookie Policy (hereinafter referred to as the Policy) has been developed for the <http://ido-webinar.selezneva-navchania.com> website in order to explain to its users for what purposes and what kind of personal data is collected, processed, used and stored when using this website and when accepting the terms of the Public Offer.

The website is managed by the Website Administration (the Administration), which is recognized as the administrator (processor under the GDPR) and the owner (controller under the GDPR) of personal data.

Please read this Policy and its provisions carefully if you want to use the functions of this Website, have the opportunity to accept the Public Offer, consume services under the Agreement, receive technical support and/or obtain further personal access to the personal access to the Group chat and Telegram channel.

DEFINITIONS

Website (Site) – a set of software, information, and any other means logically interconnected with each other available on the Internet.

Personal data owner – a natural or legal person who determines the purpose of personal data processing, establishes the composition of this data and procedures for its processing, unless otherwise provided by law.

User – any individual who has access to the Website and uses the Website via the Internet.

Personal data – information or a set of information about an individual who is identified or can be specifically identified.

Public Offer (Agreement) – an offer of the Website Administration addressed to any person to conclude a public service agreement with them, which is posted on the Website or on one of the Website's web pages.

Personal data controller – a natural or legal person who is authorized by the personal data owner or by law to process this data on behalf of the owner.

Authorized persons – contractors of the Site Administration who have been granted access to personal data, in particular managers and supervisors under the Public Offer.

Mailing – electronic, text and/or multimedia messages to e-mail, contact phone number, User's accounts in Telegram, Viber, etc. with commercial and/or non-commercial offers from the Website Administration and/or third parties.

Personal data subject – an individual whose personal data is processed.

Services – a set of services from the entire range of services under the Public Offer provided to Users on the terms of the Public Offer.

Group chat / Telegram channel – a means for quick exchange of text messages between the club members in the social network Telegram. The right holder of the Group Chat is the Website Administration. Unlike the Group Chat, only the Contractor or its contractors can post informational messages in the Telegram channel.

Financial Agent – the STRIPE or PAYPAL payment system, which organizes and transfers funds on behalf of the Contractor using electronic methods of processing payments for the services provided on the website.

Cookies – a small piece of data (a text file) that a website stores on an electronic computing device (computer, phone, tablet, etc.) of the User when the User visits it.

1. GENERAL PROVISIONS

- 1.1. The Website Administration does not control and is not responsible for operations with personal data through:
 - services that ensure the full functioning of the Website and the process of payment for the courses available on it, in particular the services of the Financial Agent;
 - messengers and other means of communication that ensure communication between the Administration and users of the Website.
- 1.2. The Site Administration reserves the right to make any changes and amendments to this Policy in case of changes in the method, procedure and/or purpose of collecting, processing, using or storing personal data received by the Administration.

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2. CATEGORY OF PERSONAL DATA SUBJECTS

- 2.1. The category of personal data subjects may include Website Users who accept to the terms of the Privacy Policy and persons who have entered into an accession agreement with the Website Administration by accepting the Public Offer.

3. SUBJECT OF THE POLICY AND COMPOSITION OF PERSONAL DATA

- 3.1. This Policy imposes an obligation on the Website Administration and the Authorized Persons to not disclose and ensure the protection of the confidentiality of the Users' personal data.
- 3.2. The Policy establishes the purpose (purposes) and grounds for processing personal data, categories of personal data subjects, composition of personal data, procedure for processing personal data and Cookies, as well as the procedure for sending out mailings, consent to which was provided by the User of the Site.

3.3. Sources from which personal data used in accordance with this Policy is obtained:

- *Registration forms*: by filling in the forms by the User when choosing and purchasing a specific tariff of the Services.
- *E-mail*: by receiving/sending electronic messages when interacting with the Administration or Authorized Persons.
- *Telephone*: by making calls to communicate with the Website Administration or Authorized Persons.
- *Interaction with advertising*: interaction with advertisements about the services of the Website Administration on third-party websites.
- *Data from other sources*: social networks (for example, Telegram, Instagram, Facebook, market research, public and other sources from which the Website Administration or Authorized Persons have gained access to personal data.

3.4. The Administration collects only those personal data that has been provided knowingly and voluntarily provided by the User to use the Website, order services and/or communicate with the Administration or Authorized Persons.

3.5. When the User uses any of the sources specified in the Policy, the User's personal data is processed, which in certain cases may include:

- surname;
- first name;
- contact phone number;
- e-mail address.

3.6. The Site Administration reserves the right to automatically collect Cookies when the User visits the Site.

3.7. The Website Administration does not process personal data that poses a particular risk to the rights and freedoms of personal data subjects.

3.8. To pay for the services under the Public Offer, the User shall follow the link to the secure page of the Financial Agent. The User shall indicate the details of his/her payment card in the place provided. All payments are processed by the Financial Agent in accordance with the standards for protecting card details.

3.9. Personal data regarding bank accounts, bank cards, payment information, etc. shall be processed by the Financial Agent in accordance with the Privacy Policy or other documents of the Financial Agent.

4. **COMPOSITION AND PROCEDURE FOR PROCESSING COOKIES**

- 4.1. The Website Administration can use the Google Analytics web analytics service and advertising service offered by Google Inc. (hereinafter - "Google"). It also collects its own session cookies solely to track the statistics, optimize the website, and personalize the experience for each User.
- 4.2. Google Analytics and Google Ads can use cookies that are stored on the electronic device to facilitate the analysis of the use of the website and store information about the User's online behavior. Cookies do not harm the User's electronic device and do not contain viruses.
- 4.3. Google cookies may collect the following information:
- the addresses of the web pages of the Website that were viewed by the User;
 - addresses of previous web pages from which the Website was accessed;
 - browser language settings;
 - time, date and duration of the website visit;
 - information about the User's browser, including the name, version of the browser, etc.
- 4.4. This Privacy Policy provides for the possibility to process "session" and "persistent" Cookies:
- **"Session"** cookies are temporary and are stored only until the end of the browser session.
 - **"Persistent"** Cookies remain on the hard disk of the User's electronic computing device or on electronic media until the User deletes them.
- 4.5. The information about the use of the Website by the User created by the Google cookie is transmitted to and stored on a Google server in the United States of America. Google will use this information for the purpose of evaluating the use of the Website by the User, compiling reports on the Website's activity and providing other services related to the Website activity and Internet usage to the Website Administration. The IP address transmitted from the User's browser as part of Google Analytics or Google Ads will not be merged with any other data held by Google.
- 4.6. The website administration may process:
- **Necessary Cookies** help make the website usable by providing basic functions such as page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
 - **Statistical Cookies** help the Website Administration to understand how visitors interact with the Website by collecting and anonymously reporting information.

- **Marketing Cookies** are used to track Users of the websites. The purpose is to display ads that are relevant and attractive to the individual User and therefore more valuable to publishers.
- 4.7. The User has the right to refuse the use of Cookies by changing the appropriate settings in their browser software or by sending an e-mail to the Administration. In case of refusal to process Cookies, the User will not be able to use all the functions of the Website.

5. PURPOSE (GOAL) OF PERSONAL DATA PROCESSING

- 5.1. The processing of personal data under this Privacy Policy is carried out for the purpose (purpose) of the proper provision of services to the User by the Website Administration, namely:
- creating a list of participants in the Group chat and Telegram channel;
 - establishing communication with the User by adding the User's account to the Group Chat and Telegram channel, which is the subject of the Public Offer Agreement;
 - communicating with the User through platforms and services that enable the use of audio and video communication for the provision of services by the Website Administration;
 - sending mailing with the additional consent of the personal data subject to the e-mail address;
 - providing the User with effective customer and technical support in case of problems related to the use of the Website;
 - controlling the load on the Website;
 - analyzing the effectiveness of advertising campaigns whose traffic is directed to the Website;
 - conducting statistical and other research based on anonymized data.
- 5.2. The User's personal data may be used for other purposes not provided for in the Privacy Policy, which are necessary for the proper performance of the obligations imposed on the Website Administration and the Authorized Persons by the Public Offer.

6. GROUNDS FOR PROCESSING PERSONAL DATA

- 6.1. A person who has acquired full civil capacity in accordance with the current legislation of the state of his/her citizenship has the right to be a subject of personal data and to give consent to the processing of his/her personal data. If a person does

not have sufficient legal capacity, the consent to the processing of personal data of such a person shall be provided by parents, guardians (trustees), adoptive parents.

- 6.2. Consent to the processing of personal data is provided by the User by:
- marking a checkbox on granting permission to process personal data when visiting the Website; or
 - communicating with the Administration and/or the Authorized Persons via mobile communication means or by e-mail.
- 6.3. Consent to the processing of Cookies shall be granted by the User by ticking the box in the pop-up window.
- 6.4. The website does not provide for the processing of personal data prior to the moment of marking.
- 6.5. By granting consent to the processing of data in the manner prescribed by this Section, the User fully and unconditionally agrees to all provisions of this Privacy Policy. The User gives his/her consent to the Website Administration to collect, systematize, accumulate, store, clarify (update, correct), use, disseminate, depersonalize, block, destroy his/her personal data.
- 6.6. If the User does not consent to the processing of his/her personal data in the manner prescribed by this Policy, the User will not be able to receive the services provided for by the Public Offer.

7. PROCEDURE FOR PROCESSING PERSONAL DATA

- 7.1. The collected personal data is accumulated by entering it into the relevant database, which is stored electronically on the Internet using the technical capabilities of the Website.
- 7.2. The User's personal data shall be stored for the period necessary to provide services to the Customer under the Public Offer or until they are changed or deleted at the request of the latter.
- 7.3. Personal data is stored in the personal data base in electronic form under the jurisdiction of the UAE.
- 7.4. The Website Administration uses personal data for the proper provision of services to the User:

Last name

- 1) For communication with the Website Administration and Authorized Persons.
- 2) To identify the User as a party to the Public Offer Agreement

<i>First name</i>	<p>1) For communication with the Website Administration and Authorized Persons.</p> <p>2) To identify the User as a party to the Public Offer Agreement</p>
<i>E-mail</i>	<p>1) To provide the User with personalised access to the to the Group chat and Telegram channel;</p> <p>2) To send Newsletter*. *with the additional consent of the User</p> <p>3) For communication with the Website Administration and Authorized Persons.</p>
<i>Contact phone number</i> (and the Telegram account linked to it)	<p>1) For communication with the Website Administration and Authorized Persons;</p> <p>2) To provide the User with personalised access to the to the Group chat and Telegram channel.</p>
<i>Cookies</i>	To ensure that the personal data subject is able to use the website interface without hindrance

8. PROCEDURE FOR PROCESSING PERSONAL DATA FOR MARKETING PURPOSES

- 8.1. The Website Administration may send electronic, text and/or multimedia messages to the email address, contact phone number, or messaging platforms like Telegram and Viber, etc. with commercial and/or non-commercial offers from the Administration and/or third parties.
- 8.2. The purpose of the Newsletter is to provide access to the to the Creo Learning Platform, additional materials, homework, to inform the personal data subject about the products, services, events, etc. of the Website Administration and/or its partners, as well as to conduct anonymous surveys to study the opinion about products, services, events, etc.
- 8.3. The subject of personal data gives additional consent to the implementation of the Newsletter by the Website Administration by granting consent to the processing of personal data in accordance with the procedure specified in the Policy.
- 8.4. The subject of personal data has the right to unsubscribe from the Newsletter at any time by changing the settings via the link specified in the e-mail and/or by sending an application for unsubscription to the Website Administration.

9. ACCESS PROCEDURE FOR PERSONS PROCESSING PERSONAL DATA

- 9.1. The Website Administration processes personal data by means of automated processing and/or personally and/or with the involvement of third parties providing services or performing duties on behalf of the Website Administration, including processing of business analytics, customer service, marketing, and surveys.
- 9.2. The website administration keeps records of transactions related to the processing of personal data of the personal data subject using an automated system and stores such information for 1 (one) year from the date of the transaction.

10. RIGHTS AND OBLIGATIONS OF THE PERSONAL DATA SUBJECT

- 10.1. The personal data subject has the right to:
 - Receive information about the purposes for which his/her personal data is processed.
 - Receive information about the period during which personal data is processed.
 - Receive information about the algorithm of automated processing of personal data and the consequences of such processing.
 - Require the Website Administration to correct their inaccurate personal data without undue delay.
 - To make additions to incomplete personal data, including by submitting an additional application.
 - To require the Website Administration to delete personal data related to them without unreasonable delay.
 - Require the Website Administration to restrict the processing of his/her personal data.
 - Receive their personal data provided by the User to the Website Administration.
 - To object to the processing of their personal data.
 - Appeal against actions or omissions of the Website Administration.
- 10.2. In order to exercise their rights, the User shall send a scanned copy of the motivated written request to the e-mail address of the Website Administration from the e-mail address specified by the User in the form for purchasing a service tariff on the Website.
- 10.3. The personal data subject is obliged to:
 - To comply with the provisions of this Privacy Policy.

- In case of changes in the content of personal data in respect of which the personal data subject has given consent to processing, notify the Website Administration in the manner prescribed by this Privacy Policy.

11. RIGHTS AND OBLIGATIONS OF THE WEBSITE ADMINISTRATION

11.1. The Website Administration has the right to:

- Make changes to this Privacy Policy and not notify the subject of personal data except as provided for in this Privacy Policy.
- To stop providing services to the personal data subject provided for in the Public Offer and not to return the amount of money paid by the personal data subject for such services under the conditions provided for in the Public Offer and in case of withdrawal of consent to the processing of personal data.

11.2. The Website Administration is obliged to:

- Ensure the exercise of the rights of the personal data subject.
- Take the necessary organizational and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.
- Fulfill all the obligations imposed on the Website Administration by this Privacy Policy.

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12. CONDITIONS AND PROCEDURE FOR CHANGING, DELETING OR DESTROYING PERSONAL DATA

12.1. Procedure for making changes to personal data:

- The basis for making changes to personal data is a reasoned written application of the personal data subject sent to the e-mail address of the Website Administration from the e-mail address that the User specified in the form or provided to the Authorized Persons when purchasing services on the Website.
- The Website Administration shall check the content of the request of the personal data subject.
- Changes are immediately made to the personal data base from the moment the discrepancy is established in accordance with the stated requirements.

12.2. Procedure for deletion and destruction of personal data:

- The grounds are:

- Withdrawal of consent to the processing of personal data, i.e. objection to the processing of your personal data by sending a reasoned written request to the personal data subject.

- Expiration of the period of personal data processing provided for in this Privacy Policy.

- The website administration shall notify the personal data subject of the consequences of withdrawal of consent.
- The website administration deletes or destroys personal data without unreasonable delay.

12.3. In case of deletion or destruction of personal data as a result of withdrawal of consent to the processing of personal data, the Website Administration has the right to stop providing the services provided for in the Public Offer and not to refund the amount of money paid by the personal data subject for the services.

12.4. The Administration shall notify the subject of personal data of the change, deletion or destruction of personal data within ten (10) business days.

13. DISTRIBUTION AND CROSS-BORDER MOVEMENT OF DATA

13.1. The User's personal data may be disseminated (distributed, transferred) to authorized state and judicial authorities only if there are legal grounds and a corresponding request.

13.2. The Website Administration has the right to amend this Privacy Policy and provide for its right to disseminate personal data to third parties, if the receiving party provides and guarantees an appropriate level of data protection.

13.3. The Administration shall notify personal data subjects of changes to the dissemination of their personal data by sending a notification to the personal data subject's e-mail address. The personal data subject agrees to the updated version of the Privacy Policy by tacit consent.

13.4. If the personal data subject does not agree to the updated version of the Privacy Policy, the latter is obliged to send a withdrawal of consent in the manner prescribed by this Privacy Policy.

13.5. Cross-border transfer outside the territorial boundaries of the UAE occurs if the following grounds are available:

- the transfer is necessary on important grounds of public interest;
- transfer is necessary for the formation, exercise or defense of legal claims;
- the transfer is necessary to protect the vital interests of the data subject or other persons if the data subject is physically or legally incapable of giving consent.

14. MECHANISM OF PERSONAL DATA PROTECTION

- 14.1. The Website Administration shall take the necessary organizational and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.
- 14.2. In case of leakage, illegal dissemination of personal data caused by third parties, the Administration shall immediately, upon discovery of the fact of leakage and/or illegal dissemination of personal data, notify the personal data subjects by sending a message to the personal data subject's e-mail address.
- 14.3. The website and database in which personal data is stored shall operate with the use of measures to ensure the security of personal data.

15. LIABILITY OF THE PARTIES

- 15.1. The Website Administration shall be liable for any losses incurred by the User in connection with the misuse of personal data, except as provided for in this section.
- 15.2. In case of loss or disclosure of personal data, the Website Administration shall not be liable if such personal data:
 - became or were public at the time of loss or disclosure;
 - were received from a third party before it was received by the Website Administration;
 - were disclosed with the consent of the User.

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16. DISPUTE RESOLUTION PROCEDURE

- 16.1. The User and the Website Administration shall resolve all disputes and disagreements arising from the relations covered by this Privacy Policy through negotiations.
- 16.2. Disputes not resolved by the Parties shall be settled in court. Claims shall be filed with the court at the location of the Administration.

17. FINAL PROVISIONS

- 17.1. The Website Administration has the right to make changes to this Privacy Policy without the consent and notification of the User, except as provided for in this Privacy Policy.
- 17.2. The new Privacy Policy comes into force from the moment it is posted on the website, unless otherwise provided by the new version of the Privacy Policy.

- 17.3. Informed consent to the newsletter, the Notice on Cookies processing and other provisions in any form regarding the processing of personal data posted on the website are integral parts of this Privacy Policy.

Website Administration:

Company FREEFLOW SOLUTION SERVICES – FZCO

Registered address: IFZA Business Park, DDP, PO Box 342001, Dubai, United Arab Emirates

Registration number: DSO-FZCO-42278

Trade license number: 44456

Email: cryptoinvestor.from.01@gmail.com