# **Privacy Policy**

#### I. General provisions

This Privacy Policy (hereinafter referred to as the Policy) is an official document developed in accordance with the current legislation of the Ukraine and approved by Shevchenko Igor Valerievich (hereinafter referred to as the "Company"), and determines the order of processing and protection of information about individuals (hereinafter referred to as the "Users") who use the services, information, services, programs and products of the Company using the website of the company utify.io (hereinafter referred to as the Site).

User's use of the Site means consent to this Privacy Policy and the terms of processing of User's personal data. In case of disagreement with the terms of the Privacy Policy, the User must stop using the Site.

The purpose of this Privacy Policy is to ensure the protection of the rights and freedoms of individuals and citizens when processing their personal data. Processing of personal data is carried out by the Company in compliance with the principles of good faith, lawfulness of the purposes and methods of processing of personal data, compliance of the purposes of processing of personal data with the purposes predetermined and stated in the collection of personal data, compliance with the volume and nature of processed personal data, methods of processing of personal data to the purposes of processing of personal data.

This Regulation regulates the process of processing of personal data by the Company, namely, actions and operations performed with or without the use of automation means with personal data, including the collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion and destruction of personal data.

#### II. Personal data collection

The purpose of processing personal data is to fulfill the Company's obligations to Users in relation to the use of the Site and its services.

Processing of personal data of users is carried out with the consent of the subject of personal data for processing of his personal data.

Personal data means any information related to the subject of personal data and which can be used to identify a certain person or to communicate with him/her.

The company is collecting the following information:

- last name, first name, patronymic of the User;
- date of birth of the User;
- Gender of the user;
- postal address and place of residence of the User;
- User's contact phone number;
- User's e-mail address;
- information about the User's bank cards (full name, card number, cvv code).

Also the Company has the right to request other personal data of the User with a view of performance of the obligations arising from the contract concluded between the Company and the User.

The Company does not verify the accuracy of personal information provided by the User, believing that the User is acting in good faith, prudently and making every effort to keep such information up to date. The User has the right to change (update, supplement) the provided personal information or part of it at any time.

#### III. Storage and use of personal data

Personal data of Users is stored exclusively on electronic media and processed using automated systems, except in cases when non-automated processing of personal data is necessary in connection with the fulfillment of the requirements of current legislation of the Ukraine or in order to fulfill obligations arising from the contract concluded between the Company and the User.

The personal data collected by the Company is used for the purpose:

-User registration on the Site;

-providing a personalized service;

-access to the services that the User wishes to use;

-connection with the User, including for sending notices, requests and information related to the use of the Site, processing requests and applications of the User, to send e-mail marketing messages related to the services of the Company and / or its partners;

-improving the quality of the Site, client service and increasing the convenience of its use.

-Sending notices to the User related to the execution of the agreement concluded between the Company and the User, as well as notifications about new products, services and special offers.

The user has the opportunity to unsubscribe from the newsletter at any time by informing the Company of these contacts for feedback, as well as making changes in the settings of your profile on the site.

#### IV. Transfer of personal data

The Company does not transfer personal data of Users to third parties, except for the cases directly provided by the current legislation of the Ukraine, as well as this Regulation.

Processing of personal data of the User is carried out without limitation of the term, in any legal way, including in information systems of the personal data with use of means of automation or without use of such means.

The user agrees that the Company has the right to transfer personal data to third parties, in particular, to courier services, postal organizations, telecommunication operators, etc., only for the purposes provided by this Privacy Policy. Also the Company transfers personal data of the User to the third parties under the instruction of the User.

The Company has the right to transfer the User's personal information to some third parties for processing on behalf of the Company or when it is necessary for the provision of services with the above described purposes in mind. The Company requires third parties to strictly observe the confidentiality of the information transmitted and prohibits the use of the User's personal information for their own commercial purposes.

#### V. Termination of personal data processing

The User has the right to withdraw his consent to the processing of personal data at any time by sending a written notice to the Company. Withdrawal of the User's consent to the processing of personal data leads to the destruction of records containing personal data in the systems of

personal data processing of the Company, which may make it impossible to use the services and facilities of the Site.

#### VI. Personal data protection

To ensure the protection of personal data of the User in accordance with the Law "On Personal Data" of 01.06.2010 № 2297-V the Company takes all necessary precautions.

When processing personal data, the Company takes the necessary legal, organizational and technical measures to protect personal data of Users from illegal or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data.

Such measures, in accordance with Law No. 01.06.2010 № 2297-V "On Personal Data", include

-Determination of threats to personal data security when processing them in personal data information systems;

-Application of organizational and technical measures to ensure security of personal data during its processing in personal data information systems;

-application of the information security measures that have passed through the established procedure of conformity assessment of the information security means;

-Assessment of the effectiveness of measures taken to ensure the security of personal data prior to the commissioning of the personal data information system;

-Detecting unauthorized access to personal data and taking action;

-Restoring personal data modified or deleted as a result of unauthorized access to it;

-establishment of rules for access to personal data processed in the personal data information system, as well as ensuring registration and accounting of all actions taken with personal data in the personal data information system;

-control over the measures taken to ensure the security of personal data and the level of security of personal data information systems;

-recording of machine data carriers of personal data;

-Monitoring of users' actions, conducting of proceedings on the facts of violation of personal data security requirements.

The Operator shall not be held responsible for the actions of third parties who have gained access to the User's information as a result of using the Internet or the Site's services, and for the consequences of using the data and information, which, by the nature of the Site, are available to any Internet user.

The User has the right to contact the Company regarding the Company's Privacy Policy or data processing by the Company.

### VII. Final provisions

The present Regulation is subject to amendment, completion in case of appearance of new legislative acts and special normative documents on personal data processing and protection. The new Privacy Policy comes into effect from the moment it is posted on the Company's Website, unless otherwise provided by the new version of the Privacy Policy.

The present Regulation is an internal document of the Company and it placement on the official Site of the Company.

Control of execution of requirements of the present Regulation is carried out by the person responsible for safety of the personal data of the Company.

## Address of placement on the Internet: https://utify.io/policy.pdf

Date "21" January 2019

Date of last change "21" January 2019