



PERSONAL DATA PROCESSING POLICY

Privacy Policy on Personal Data Processing

1. General Provisions

This personal data processing policy is drafted in accordance with the legislation and defines the procedure for processing personal data and measures to ensure the security of personal data by "ANOOMA LTD» (hereinafter referred to as the 'Executor').

The Executor considers the observance of human and civil rights and freedoms during the processing of personal data as the most important condition of its activity, including the protection of the rights to privacy, personal and family secrets.

This Policy of the Executor regarding the processing of personal data (hereinafter - the 'Policy') applies to all information that the Executor may receive about visitors to the website.

2. Basic Terms Used in the Policy

Automated processing of personal data - processing of personal data using computing equipment.

Blocking of personal data - temporary suspension of personal data processing (except in cases where processing is necessary to clarify personal data).

Website - a set of graphic and information materials, as well as computer programs and databases, ensuring their accessibility on the Internet.

Information system of personal data - a set of personal data contained in databases and ensuring their processing by information technologies and technical means.

Depersonalization of personal data - actions that make it impossible to determine, without additional information, the belonging of personal data to a specific User or another subject of personal data.

Processing of personal data - any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Executor - a state body, municipal body, legal or natural person, independently or jointly with other persons, organizing and/or carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.

Personal data - any information relating directly or indirectly to a specific or identifiable User of the website.

Customer - any visitor who has accepted the website's license agreement.

Provision of personal data - actions aimed at disclosing personal data to a specific person or a specific circle of persons.

Distribution of personal data - any actions aimed at disclosing personal data to an indefinite number of persons (transfer of personal data) or familiarization with personal data by an unlimited number of persons, including publication of personal data in the media, posting in information and telecommunication networks, or providing access to personal data in any other way.

Cross-border transfer of personal data - transfer of personal data to the territory of a foreign state to the authority of a foreign state, a foreign natural or foreign legal person.

Destruction of personal data - any actions as a result of which personal data are destroyed irreversibly with the impossibility of further restoration of the content of personal data in the personal data information system and/or as a result of which material carriers of personal data are destroyed.

3. Executor may process the following personal data of the Customer

- Surname, name, patronymic;
- Email address;
- Phone numbers;
- Year, month, date and place of birth;
- Documents.

The above data are hereinafter referred to as Personal Data.

4. Purposes of Processing Personal Data

The purpose of processing the Customer's personal data is to inform the User by sending emails, providing the User with access to services, information and/or materials contained on the website.

The Executor also has the right to send the User notifications about new products and services, special offers and various events. The User may always opt out of receiving informational messages by sending the Executor an email marked 'Refusal of notifications about new products, services, and special offers.'

Depersonalized data of Users collected through internet statistics services are used to collect information about User actions on the site, to improve the quality of the site and its content.

5. Legal Basis for Processing Personal Data

The Executor processes the Customer's personal data only if they are filled in and/or sent by the User independently through special forms located on the website. By filling out the respective forms and/or sending personal data to the Executor, the User expresses consent to this Policy.

The Executor processes depersonalized data about the Customer if this is allowed in the User's browser settings (enabled saving of 'cookies' and use of JavaScript technology).

6. Obligations of the Parties

- The Executor undertakes to provide legal assistance, if possible, to the Client for a fee of 15% of the amount paid.
- The Executor is prohibited from transferring clients' personal information to third parties, except where necessary.
- The Executor may terminate the agreement unilaterally in case of violations of the agreement by the Customer.
- The Customer undertakes to provide all necessary information to the Executor.
- If the Customer terminates cooperation unilaterally after receiving an official court decision in favor of the Customer, the Customer must pay for the services of the Executor 10% of the amount of the court claim won.
- The Customer is obliged not to disclose information to third parties unrelated to the proceedings.

7. Procedure for Collection, Storage, Transfer and Other Types of Processing of Personal Data

The security of personal data processed by the Executor is ensured through legal, organizational, and technical measures necessary to fully comply with current legislation in the field of personal data protection.

The Executor ensures the confidentiality of personal data and takes all possible measures to exclude access to personal data by unauthorized persons.

The Customer's personal data will never, under any circumstances, be transferred to third parties, except in cases related to compliance with current legislation.

If inaccuracies in personal data are identified, the User may update them independently by sending a notification to the Executor by email marked 'Updating personal data.'

The period of processing personal data is unlimited. The Customer may at any time withdraw consent to the processing of personal data by sending the Executor a notification via email marked 'Withdrawal of consent to the processing of personal data.'

8. Cross-Border Transfer of Personal Data

Before starting the cross-border transfer of personal data, the Executor must ensure that the foreign state to whose territory the transfer is intended provides reliable protection of the rights of personal data subjects.

Cross-border transfer of personal data to the territories of foreign states that do not meet the above requirements may only be carried out if there is written consent of the subject of personal

data to the cross-border transfer of his/her personal data and/or the execution of a contract to which the subject of personal data is a party.

9. Final Provisions

The Customer may obtain any clarifications on issues of interest regarding the processing of his/her personal data by contacting the Executor via email.

Any changes to the Policy for processing personal data by the Executor will be reflected in this document. The Policy is valid indefinitely until replaced by a new version.