



## WEBSITE PRIVACY POLICY

The Website Privacy Policy (hereinafter referred to as the “Policy”) applies to all information about you, which SIMCORD (registration number: 37657823) registered at the address 18 Otakara Yarosha str., Kharkiv, Ukraine (hereinafter referred to as the “Company”) can obtain when you use the functionality of the website <https://www.simcord.com> (hereinafter referred to as the “Website”).

This Policy is prepared in accordance with the Regulation (EU) 2016/679 “General Data Protection Regulation” (hereinafter referred to as “GDPR”), Directive 2009/136/EU as well as Directive 2002/58/EU “Privacy and Electronic Communications” (ePrivacy Directive). This Policy provides you with information on what type of personal data is collected while you use the functionality of the Website, why it is collected and how it is processed. Within the scope of the Policy, you are a personal data subject.

We recommend that you read the terms and conditions of the Policy before using the functionality of the Website and accepting this Policy.

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## 1. TERMS AND DEFINITIONS

**1.1.** The terms used in this Policy shall be interpreted in accordance with the definitions given below:

**1.1.1. Personal data** is any information directly or indirectly related to a personal data subject. In accordance with GDPR, personal data of a personal data subject shall be:

- full name;
- date and place of birth;
- address of permanent and temporary residence;
- mobile phone number;
- information about family and social status;
- information about education, profession and occupied position;
- information about income and financial situation;
- biometric data;
- cookies (along with other personal data), etc.

**1.1.2. Processing of personal data** is any action (operation) or a set of actions (operations) with personal data using automation tools or without using such tools, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of personal data and other actions.

**1.1.3. Confidentiality of personal data** is a requirement to prevent distribution of personal data without the consent of the personal data subject or without any other legal grounds binding upon the Company.

**1.1.4. Personal data subject** is any natural person, whose personal data is subject to processing.



## **2. GENERAL PROVISIONS**

**2.1.** This Policy shall apply to legal relations that arise out of the use of the functionality of the Website.

**2.2.** If you do not agree to the terms of the Policy, the Company will not be able to process your personal data, which will result in restriction of your use of the functionality of the Website.

**2.3.** Changes and/or additions can be made to the Policy through publication of the updated Policy on the Website. The changes and/or additions shall be deemed accepted the first time you use the functionality of the Website after the updated Policy is published. If you do not agree with any changes, the only way of protecting yourself from unauthorized processing of personal data is to stop using the functionality of the Website.

**2.4.** The Company has no control over and shall not be responsible for the privacy practices of third-party resources. If you accept a privacy policy on a third-party resource, it shall not mean that you accept this Policy and vice versa. The Company has no control over and shall not be responsible for third-party resources that can be visited by clicking the links available on the Website.

## **3. SCOPE OF THE PRIVACY POLICY**

**3.1.** The Policy establishes the Company's non-disclosure obligations and ensures confidentiality of personal data.

**3.2.** The Company can obtain your personal data when you use the functionality of the Website. This personal data shall be:

- full name;
- telephone number;
- e-mail.

**3.3.** The data obtained through automatic collection is considered analytical (statistical) and is not the data identifying a certain personal data subject.

**3.4.** The Company can obtain the following data through automatic collection:



- IP addresses accessing the Website;
- information from cookies (a small piece of data sent by a web server and stored on your computer, which is sent to the web server in an HTTP request each time you try to open the page of the corresponding website);
- information about browser;
- access time;
- referrer (address of the previous page);
- information related to how you interact with the Website.

#### **4. PURPOSES OF COLLECTING PERSONAL DATA**

##### **4.1. Personal data is collected in order to:**

- optimize the operation of the Website;
- protect against automated attacks and abuses/hacks;
- improve the data collection, storage and processing methods to prevent unauthorized access to the Website;
- measure the performance of the Website;
- save settings and session (use of the website or app) data for further use;
- analyze your use of the functionality of the Website;
- provide information support should any issues related to the use of the functionality of the Website arise;
- provide feedback, including sending notifications and requests regarding the use of the functionality of the Website, services, processing your requests and applications;
- provide updates, special offers, information, newsletters, etc.;
- monitor activity when using the functionality of the Website.

**4.2.** All collected personal data shall be used for the specific above-mentioned purposes and only to the extent necessary for the full functioning of the Website.



## **5. METHODS FOR COLLECTING AND PROCESSING PERSONAL DATA**

**5.1.** You are hereby notified that when you use the functionality of the Website, the Company can obtain data about the applications installed on the device and use this data to implement certain functions of the Website.

**5.2.** The Company may send you a request for provision of personal data or for permission to process already available personal data.

**5.3.** The Website uses protection tools to ensure security of your personal data. When servicing the Website, the Company receives information that allows detecting and automatically eliminating the components that pose a potential security threat to the Website.

**5.4.** The Company uses a number of processes/methods for protecting the Website from unauthorized attempts to access, modify, disclose or destroy data.

**5.5.** The Website can use third-party services that may collect your personal data. You can receive the up-to-date information on third-party service providers used on the Website through the feedback form on the Website by submitting the relevant request.

**5.6.** The Company is entitled to transfer your personal data to third-party services (third parties) in order to:

- optimize the operation of the Website;
- render services related to the maintenance of the Website.

**5.7.** Your personal data may be transferred to the authorized state authorities and/or competent organizations only on the basis and in the manner established by international laws and the laws of the country you are a citizen of.

**5.8.** Personal data is provided to third-party services in accordance with the existing confidentiality requirements for the specific above-mentioned purposes, and only to the extent necessary for the full functioning of the Website.



## **6. COMPANY CONTACTS**

**6.1.** Messages or requests are sent to your actual residence address, e-mail address, telephone number or using any other means of communication you specified.

**6.2.** You can contact the Company by contacting the Support Service on the Website.

## **7. COMPULSORY CONDITIONS**

**7.1.** In case of the arising questions regarding this Policy, one should fill in the [form](#) on the Website.

**7.2.** Only the Company shall make any changes and additions to the Policy.

**7.3.** In case of any differences between various versions (printed, electronic, etc.) of the Policy, the electronic version currently available on the Website shall be deemed the official one.

**7.4.** The translation of the Policy into other languages is available on the Website for Website Users' convenience only. In case of any differences in understanding and/or interpretation hereof, the version in Russian shall prevail.