



**PRIVACY POLICY**

This Privacy Policy (hereinafter the “Policy”) applies to all information about Internet Users, which Simcord LLC. Technologies (Company ID code 37657823) (hereinafter the “Company”) can obtain during the use of the official website of the company Simcord LLC [www.simcord.com](http://www.simcord.com) (hereinafter the “Website”) by Internet Users.

This Policy complies with the General Data Protection Regulation (GDPR) as well as applicable regulations and requirements.

The aim of this Policy is to provide Internet Users with information on what type of Personal Data is collected, why it is collected and how it is processed while using the Website.

You must accept the terms and conditions of this Privacy Policy prior to using the Website.

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## 1. TERMS AND DEFINITIONS

- 1.1. Personal Data** means any information directly or indirectly related to a specific or designated Internet User.
- 1.2. Processing of Personal Data** means any action (operation) or set of actions (operations) performed using automation tools or without using such tools with Personal Data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, access provision), depersonalization, blocking, deletion, destruction of Personal Data and other actions.
- 1.3. Confidentiality of Personal Data** means a mandatory requirement for the Company to prevent the dissemination of Personal Data without the consent of the Internet User or without any other legal basis.
- 1.4. Internet User** means a natural person who uses the Website.

## 2. GENERAL PROVISIONS

- 2.1.** This Privacy Policy applies to Internet Users of the Website.
- 2.2.** By using the Website in any form on any device, the Internet User accepts and agrees to this Privacy Policy as well as to the terms and conditions of Processing of Personal Data.
- 2.3.** If the Internet User does not agree to the terms and conditions of the Privacy Policy, he/she must immediately cease any use of the Website.
- 2.4.** The Privacy Policy (including any of its parts) may be amended by the Company without any special notice and without paying any compensation in this regard. The new version of the Privacy Policy comes into force on the date of its publication on the Website.
- 2.5.** The Company has no control over and is not responsible for the privacy practices of third-party resources. If the Internet User accepts a privacy policy on a third-party resource, it does not mean that he/she accepts this Policy and vice versa. The Company has no control over and is not responsible for the third-party resources that can be visited by clicking the links available on the Website.



### 3. SCOPE OF THE PRIVACY POLICY

- 3.1.** This Privacy Policy establishes the rules for collection of Personal Data, the Company's non-disclosure obligations and ensures Confidentiality of the Personal Data of Internet Users of the Website.
- 3.2.** The Company can obtain Personal Data of Internet Users directly from them by requesting such data, as a result of filling in the feedback form by the Internet User, as well as through CVs sent by Internet Users.
- 3.3.** The list of the obtained/required Personal Data includes but is not limited to:
- full name;
  - date and place of birth;
  - country of residence/location;
  - contact phone number;
  - Email address;
  - other data obtained from CVs.
- 3.4.** The Company can obtain Personal Data of Internet Users by automatically collecting their data during the use of the Website.
- 3.5.** The data obtained through automatic collection is considered analytical (statistical) and is not the data identifying a specific Internet User. By further using analytical (statistical) data, the Company employs all measures necessary so that a specific Internet User cannot be identified through such data.
- 3.6.** The Company can obtain the following data through automatic collection:
- IP addresses;
  - information from cookies (a small piece of data sent by a web server and stored on the Internet User's computer, which is sent to the web server in an HTTP request each time the Internet User tries to open the page of the corresponding website);
  - information about the browser (or another program that provides access to display of ads);
  - access time;
  - geolocation;
  - address of the page where the ad unit is located;
  - referrer (address of the previous page);
  - unique device identifiers (for example, IDFA or other identifiers on Apple devices and the ones using the Android operating system);
  - other information about the device used to access the Website, language of use, operating system, country the resources have been accessed from;
  - information related to how the Internet User interacts with the Website (links and URLs, number of clicks, domain names, landing pages, viewed pages and order of



pages, amount of time spent on certain pages, date and time when Internet resources were used, error logs and other similar data).

**3.7.** The Company is not entitled to request Personal Data, which belongs to the category of Personal Data that discloses racial or ethnic origin, political views, religious or philosophical convictions, membership in trade unions or other information of a similar nature about the Internet User.

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

**4.1.** Personal Data is collected in order to:

- provide feedback to Internet Users;
- optimize the operation of the Website;
- protect against automated attacks and abuses/hacks;
- constantly 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 data of the visit of the Website for further use;
- analyze the use of the Website by Internet Users;
- determine the geolocation/location to select the best offers/news;
- provide effective customer and technical support should any issues related to the use of the Website arise;
- provide feedback, including sending notifications and requests regarding the use of the Website, services, processing requests and applications from Internet Users;
- provide updates, special offers, information, newsletters and other data;
- monitor the behavior of Internet Users in the framework of the Website.

**4.2.** All collected Personal Data is used for specific above-mentioned purposes and only to the extent necessary for the complete functioning of the Website.

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

**5.1.** By accepting this Policy, the Internet User is notified and agrees that while using the Website, the Company can obtain data about the applications installed on the device of the Internet User that is used to access the Website and use this data to implement certain functions of the Website.

**5.2.** The Company may send the Internet User 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 Personal Data of Internet Users. When servicing the Website, the Company receives information, which allows detecting and automatically eliminating components that threaten the security of 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 Company uses third-party services that may collect Personal Data of Internet Users. To view the Privacy Policy of third-party service providers used by the Company, follow the links below:
- [Google Analytics](#);
  - [Yandex.Metrica](#).
- 5.6.** The Company is entitled to transfer Personal Data of Internet Users 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.** Personal Data of the Internet user 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, which the Internet User is a resident 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 complete functioning of the Website.

## 6. COMPULSORY CONDITIONS

- 6.1.** The Company, at its sole discretion, shall make changes and amendments to this Policy.
- 6.2.** Notwithstanding the existence of this Policy in writing, its electronic version published on the official website [www.simcord.com](http://www.simcord.com) shall prevail.
- 6.3.** This Policy is translated into English and/or other languages for convenience only. In case the interpretation of the original version of this Policy (its translation into English and/or other languages) differs from Russian, the Russian version shall prevail.
- 6.4.** Whenever the context shall require, all words herein in the masculine gender shall be deemed to include the feminine or neutral genders, all singular words shall include the plural, and plural words shall include the singular.
- 6.5.** The right to interpret the provisions of this Policy, as well as the right to amend this Policy belongs exclusively to the Company.



- 6.6.** Any deviation from this Policy by the Internet User or non-compliance with these terms, conditions and procedures due to his/her own interpretation of separate provisions shall be unacceptable.

## 7. OTHER CONDITIONS

- 7.1.** For Internet Users, who are residents of the countries in the European Economic Area (EEA), the Company has appointed Simcord Information Services SIA (Latvia. Registration number 40103781754) as a representative for sending requests related to the Processing of Personal Data.
- 7.2.** Contact the representative: [complaints@simcord.com](mailto:complaints@simcord.com).
- 7.3.** Messages or requests are sent to the Internet User's Email address, telephone number or using any other means of communication specified by the Internet User in the feedback form.