

PRIVACY POLICY OF “DOCAA”

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1. GENERAL PROVISIONS

This Privacy Policy outlines how “DOCAA” collects and processes your personal information through the websites and applications of “DOCAA” that refer to this Privacy Policy. We prioritize ensuring that you feel comfortable and trust us with your data while using our Services. This Policy applies to the processing of personal data by “DOCAA” using automated means, including through information and telecommunication networks, as well as non-automated means. In general, we collect data to create optimal conditions for your use of our Services. The terminology and concepts used in this legal document have the same meanings as in the Terms and Conditions of cooperation with the “DOCAA” service. The “DOCAA” service includes components such as websites, domain names, mobile applications, mobile and PC platforms, client applications, and any other software developed to provide or use “DOCAA” Services. This Privacy Policy applies to all platforms, websites, and other components of the “DOCAA” ecosystem. By using “DOCAA” services, you consent to the collection, storage, processing, and transfer of your personal information as described in this Privacy Policy. Limited Liability Company "UCOM MULTIOS" (Unified State Register of Enterprises and Organizations of Ukraine Code: 37794411, a company registered at the address: 76009, Ivano-Frankivsk region, Ivano-Frankivsk city, Konstanyna Malyska Street, Building 27, is the controller of personal data collected in connection with the provision of “DOCAA” services.

2. CATEGORIES OF PERSONAL DATA COLLECTED AND PROCESSED BY “DOCAA”

To provide its services, “DOCAA” collects or may collect the following categories of personal data:

- First name, surname.
- Internet Protocol (IP) address which used to connect your computer to the internet.
- Login credentials: login, email address.

3. PURPOSES OF COLLECTING USER PERSONAL DATA BY “DOCAA”

“DOCAA” uses your personal data to provide you with the best possible services. We manage your account, tailor and improve our services, process payments, run advertising and marketing campaigns, offer support, and ensure compliance and security. Below, we explain the specific purposes for which your personal data is collected and used.

To enable service delivery, “DOCAA” collects your personal data for the following purposes:

- To process orders and interact with users regarding orders and services;
- To establish feedback communication with users, sending messages and requests, and handling user inquiries and applications;
- To confirm the accuracy and completeness of the personal data provided by user;
- To create accounts, process, and receive user payments;
- To provide users with effective customer and technical support in case of issues related to the use of “DOCAA” services;
- To conduct advertising activities within “DOCAA” services;
- To comply with applicable laws and regulations, including anti-money laundering laws;
- To prevent and detect fraud or abuse, ensuring the security of users and the “DOCAA” services.

Personal data processed by “DOCAA” is subject to destruction or anonymization once the purposes of processing are achieved, or if the necessity for such purposes ceases, unless otherwise required by applicable law.

Data processing for statistical or research purposes is carried out only under the condition of mandatory anonymization of personal data.

“DOCAA” does not process personal data related to racial or national origin, political views, religious or philosophical beliefs, intimate life, or membership in associations, including trade unions.

4. AGE RESTRICTIONS

“DOCAA” does not permit individuals under the age of 18 to use its services. If an individual under the age of 18 becomes a user of the “DOCAA” ecosystem, they bear the responsibility outlined in the Terms and Conditions of cooperation.

5. COOKIES AND OTHER ONLINE IDENTIFIERS

“DOCAA” uses cookies and similar tools to enhance user interaction, deliver services, and understand how users engage with “DOCAA” services to improve them. Depending on the applicable laws in your region, a cookie banner in your browser will inform you how to accept or reject cookies.

6. TRANSFER OF USER INFORMATION TO THIRD PARTIES BY “DOCAA”

“DOCAA” transfers or may transfer user data to third parties, including trusted service providers and business partners, who assist us in delivering “DOCAA” services. This is done with strict adherence to data protection and privacy practices. Additionally, data may be shared with advertising partners and other third parties offering services through our platform. Personal data may also be disclosed under limited circumstances when required by applicable law.

User information is a critical part of our business, and “DOCAA” does not sell users' personal data to others.

Third-party service providers: we engage other companies and individuals to perform functions on our behalf. These service providers are granted access only to the personal information that is necessary to perform their functions and are prohibited from using it for other purposes. In addition they are required to process personal data in compliance with our contractual agreements and applicable data protection laws.

“DOCAA” discloses account information and other personal data when we believe it is appropriate to comply with the law, protect the rights and safety of “DOCAA,” its users, or others.

“DOCAA” transfers personal data to trusted service providers and business partners acting on our behalf (as data processors) and under our instructions. These service providers include:

- Advertising and marketing providers which assist in evaluating the effectiveness of advertisements and app installations;
- Data storage providers we trust to host and store our data securely;
- Customer support providers which help us with support and customer service operations;
- Payment and fintech providers which enable payment processing and financial operations in our app;

When sharing information with service providers and partners, “DOCAA” ensures they have access only to data necessary for their specific function. These parties are required to protect the received data and use it solely for the agreed-upon purposes in compliance with all applicable data protection regulations.

In compliance with our strict data protection policy and without compromising end-to-end encryption, we may disclose certain types of your data to law enforcement agencies, government entities, or authorized third parties in response to verified requests. These may relate to acts of terrorism, criminal investigations, suspected illegal activities, or any actions that could expose “DOCAA,” its users, or others to legal liability. Such disclosure is limited to the extent necessary to fulfill these purposes.

7. MEASURES TAKEN BY “DOCAA” TO PROTECT USERS’ PERSONAL DATA

We design our systems with your security and privacy in mind. “DOCAA” works to protect your personal information during transmission using encryption protocols and secure software.

We maintain physical, electronic, and procedural safeguards related to the collection, storage, and disclosure of your personal information. Our security procedures may require you to verify your identity to prevent unauthorized access to your account. To enhance security, we recommend using a unique password for your “DOCAA” account that is not used for other online accounts and logging out after using shared devices.

“DOCAA” takes the protection of information seriously and implements stringent security measures to safeguard your account and personal data.

We employ technical and organizational measures to ensure a security level appropriate to the risks associated with the personal data we process. These measures aim to maintain the continuous integrity and confidentiality of personal data. We regularly evaluate the effectiveness of our security measures to ensure the safety of data processing and to adapt to new risks and technologies as they evolve.

8. RIGHTS OF DATA SUBJECTS

As a data subject, you have the right to know what types of personal data we collect and why, the right to request correction or deletion of your personal data, the right to object to the collection of certain data, the right to access your personal data, the right to withdraw your consent, and the right to lodge a complaint with the competent authorities. Below, we outline these rights and explain how and when you can exercise them.

“DOCAA” respect your rights regarding the personal data we collect and store. You have the following rights:

- The right to know which types of data we collect, the sources from which we gather data, the purposes of collection and transfer, and the types of data we store. This Privacy Policy explains our methods clearly. For further questions, you can contact our support team.
- **The right to access your personal data:** you can view in your profile. For additional access inquiries, you may contact our support team.
- **Right to request correction of your personal data:** if you believe we hold incorrect or incomplete information about you, you can update your personal data at any time in your profile in the “DOCAA” application. If you cannot locate the settings, please reach out to us for assistance.
- **The right to delete your personal data - you can easily delete your personal data in the application by deleting your Account, in which case all your data will be deleted after 30 days. We delete data after 30 days to prevent fraud.**
- **Right to data protection** from unlawful processing, accidental loss, destruction, or damage of your personal data, as well as from inaccurate or defamatory information that harms your honor, dignity, or business reputation.
- **Right to object to data processing:** you may object to the processing of certain data by contacting our support team. If you receive emails from us, you can unsubscribe via the link at the bottom of the email or by contacting support.
- **Right to know,** within 30 calendar days of submitting a request, whether your personal data is being processed or stored and what specific data is involved.
- **The right to withdraw consent - if we collect or process your personal data based on your consent and permissions, you have the right to withdraw your consent at any time by contacting our support team.**
- **Right to non-discrimination.**
- **Right to lodge complaints** about the processing of your personal data with appropriate regulatory authorities.

9. PERIODS OF DATA PROCESSING AND STORAGE

We retain your personal information to allow you to continue using the components of the “DOCAA” service, as long as necessary to achieve the purposes outlined in this Privacy Policy, or as required by law. This includes purposes such as taxation, accounting, anti-money laundering compliance, or other legal obligations, which will be communicated to you if applicable.

Criteria for Data Retention Periods:

- Data necessary for managing your “DOCAA” account and using its services (e.g., your mobile phone number) will be retained as long as your account is active. After you delete your account, such data will be stored for an additional 30 days.

10. FINAL PROVISIONS

This Privacy Policy takes effect from the moment it is published on the official “DOCAA” website or other elements of the “DOCAA” service and remains valid indefinitely until replaced by a new version. “DOCAA” reviews and updates this Privacy Policy as needed, including in the following cases:

- Changes in processing procedures.
- Outcomes of inspections by data protection authorities.
- Amendments to legislation on personal data processing.
- Detection of other violations or discrepancies.

When an updated version of the Privacy Policy is released, your continued access to “DOCAA” ecosystem elements indicates that you have reviewed the updated Privacy Policy and agree to comply with its terms.

We will inform you about changes to the Privacy Policy (except for minor amendments). If the changes significantly affect the collection or use of your personal data or have any other substantial impact on you, we will notify you in advance, allowing you to exercise your rights accordingly.