Privacy policy

CONFIDENTIALITY AGREEMENT

(PRIVACY POLICY)

This confidentiality agreement has been developed in accordance with the requirements of the Law of Ukraine No. 2297 dated 01.06.2010 "On Protection of Personal Data" and other regulatory acts of Ukrainian legislation governing legal relations related to the collection, processing, storage of personal data, as well as the right of citizens to privacy and the right to self-expression.

General part

Yuriy Povarov, sole proprietor (hereinafter referred to as the Copyright Holder), taking care of the development of relations with clients and users of the website, realizing the importance of ensuring the security of your personal data, in order to resolve possible contradictions and misunderstandings, has prepared this Privacy Agreement (privacy policy), hereinafter referred to as the "Policy", and the terms of use of the website https://abonement.com.ua, as well as applications for mobile devices and tablets, hereinafter referred to as the "website". Please read this page carefully because the information contained herein is important to you as a user of the Website and all its services and facilities.

Please note that in accordance with the terms of the Privacy Policy, when you visit the resources of this web portal, you confirm your agreement with the rules and requirements of the Privacy Policy and the User Agreement (public offer) of abonement.com.ua. In case you disagree with the requirements of the Privacy Policy and the User Agreement (public offer) of abonement.com.ua, you must leave this website and refrain from visiting it in the future. Attention: The user has no right to post information, use the website if he/she does not agree with the Privacy Policy, or if he/she has not reached the age established by law when he/she has the right to enter into agreements, or is restricted in his/her rights by law, or is not an authorized person of the company on whose behalf the information is posted.

Your personal data will be stored by Yuriy Povarov, sole proprietor, using the service of Digital Ocean https://cloud.digitalocean.com/ in Frankfurt.

This Privacy Policy is effective from May 23, 2019 and will be updated as necessary and/or due to changes in applicable law. The Privacy Policy is always available at https://abonement.com.ua/privacy.

Your rights as a personal data subject

Please note that your rights as a subject of personal data are provided for in Article 8 of the Law of Ukraine No. 2297 dated 01.06.2010 "On Personal Data Protection":

- "Article 8. Rights of the personal data subject:
- 1. The personal non-property rights to personal data that every individual has are inalienable and inviolable.
- 2. The subject of personal data has the right to:
- To know the location of the personal data base containing his or her personal data, its purpose and name, location and/or place of residence (stay) of the owner or manager of personal data or give a corresponding order to authorized persons to receive this information, except in cases established by law;
- receive information about the conditions for granting access to personal data, including information about third parties to whom his/her personal data is transferred; to access his/her personal data;

- to receive a response on whether his/her personal data is stored in the relevant personal data base no later than thirty calendar days from the date of receipt of the request, except in cases provided for by law, as well as to receive the content of his/her personal data that is stored;
- to submit a reasoned request to the personal data controller with an objection to the processing of their personal data;
- to submit a reasoned request to change or destroy his/her personal data by any owner and manager of personal data, if such data is processed illegally or is unreliable;
- to protect their personal data from unlawful processing and accidental loss, destruction, damage due to intentional concealment, failure to provide or untimely provision, as well as to protect against the provision of information that is inaccurate or discrediting the honor, dignity and business reputation of an individual;
- file complaints about the processing of their personal data to public authorities and officials authorized to ensure the protection of personal data, or to the court;
- apply for legal remedies in case of violation of the legislation on personal data protection;
- to make reservations regarding the restriction of the right to process their personal data when providing consent;
- withdraw consent to the processing of personal data;
- to know the mechanism of automatic processing of personal data; to be protected against an automated decision that has legal consequences for him/her.
- 3. The use of personal data of an individual with limited civil capacity or recognized as incapacitated is carried out by his/her legal representative."

Who has access to your information:

Yuriy Povarov, the sole proprietor, provides access to your information:

- Independent third parties who provide various services to the copyright holder, including business analysis, customer service, marketing, surveys, fraud prevention. The Copyright Holder may also authorize third parties to collect information for their own purposes, for example, to operate the Website or send relevant advertisements. Third parties have access to and can collect only the information necessary to provide the service and are not allowed to use it for any other purpose.
- Business partners with whom the Copyright Holder jointly provides products and services. You can always determine which third parties provide a particular product or service, as their names will always be indicated next to the Copyright Holder. If you decide to use these additional services, we may provide our partners with access to your information, including personal data. Please note that the Copyright Holder does not control the protection of your information by such business partners.
- Linked websites. If you access the Website https://abonement.com.ua through a link from another website, the Copyright Holder may provide that website with access to your registration information, such as your name, postal and e-mail addresses, telephone number. The linked website gets full access to your information, therefore, we recommend that you read the privacy policy of the respective website before you leave that website for https://abonement.com.ua.
- Cross-platform messengers, third-party websites, payment acceptance services. From our Website, you can access a number of messengers, third-party websites, and payment acceptance services. By going to these websites, you provide them with your personal data, and the protection of such information will be carried out in accordance with the policies of these websites. You can also change your privacy settings on these websites.

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- To companies within the group. The Copyright Holder may share your personal data and other information with affiliated companies. Sharing data allows us to provide you with information about products and services that may be of interest to you. When using the information, affiliated companies adhere to the current Privacy Policy.

The Copyright Holder may also provide access to the information

- by subpoena, court order or other court order; to assert and exercise our rights; to defend against legal claims; and in other cases if required by law. In this case, the copyright holder reserves the right to raise any objection or exercise or waive any right granted to it by law.
- in cases where it is necessary to obtain information, prevent and take measures against illegal or alleged illegal actions; to protect its rights, property or safety.
- In connection with corporate transactions, such as asset disposals, mergers, asset sales, or probable bankruptcy.

The Copyright Holder may also provide general or anonymous information to third parties, such as advertisers and investors. For example, the Copyright Holder may provide advertisers with the number of visitors to the website. This information does not contain any personal data and is used for the development of the website.

Purposes of collecting your personal data

One of the purposes of the creation and operation of the Copyright Holder's website is to inform you about who we are and what we do. The Copyright Holder collects and uses personal data (including your name, city of residence, telephone number, e-mail address, etc.) to better provide you with the necessary services and information.

Therefore, the Copyright Holder may use your personal data to: - answer your questions and requests;

- process your orders and requests for services;
- regulate or otherwise fulfill its obligations in connection with any agreement you have entered into:
- prevent and resolve problems related to any services provided to you; create products or services that meet your needs; promptly respond to any complaints you may have related to defects in the services provided to you.
- To optimize its services, the Copyright Holder may use your personal data for direct marketing (including providing information about goods and services that may be of interest to you in the future by sending SMS and e-mail messages, or by phone call);
- Except as set forth in this Privacy Policy, the Copyright Holder will not disclose any of your personal information unless required to do so by law (for example, if required to do so in the course of legal proceedings, or to prevent fraud or other crime), or if it believes that such action is necessary to protect and/or defend its rights, property or personal safety, and similarly in relation to our users/customers and other persons.

Please be assured that the copyright holder will not use your information for any purpose if you inform us that you do not want the copyright holder to use your information in this way when the information is provided or later.

Security of your personal data

The Copyright Holder values your personal information and therefore ensures a sufficient level of its protection. Therefore, the Copyright Holder has implemented technologies aimed at protecting your confidential data from unauthorized access and improper use, and will update these measures accordingly when new technologies become available.

Use of your personal information on other websites

The Copyright Holder's website may contain links to other websites or you may follow a link from another website to our website. As you understand, we cannot be responsible for the privacy policies and practices on other websites.

Such content is covered by the respective terms of use, as well as any additional privacy policies and information provided in connection with the use of the third-party site.

The Copyright Holder recommends that you study the policies of each site you visit to better understand your rights and obligations, especially when you provide any type of content on these sites. If you have any doubts or questions, please contact the owner or operator of such site.

Policy on cookies, use of Google Analytics

During the operation of the website, the Copyright Holder uses cookies. With their help, it is possible to identify the browser of users who visit our portal repeatedly, these files can save user settings and other information. For the convenience of using the site, we use the remarketing function. This function also uses cookies.

You can set your browser to reject all cookies or to notify you when they are sent.

Using Google Analytics, the Copyright Holder collects statistics about the visits to the portal, such as pages visited, number of page views, domains, Internet providers and countries of origin of our visitors, as well as addresses of sites visited before and after the portal, etc.

However, none of these activities are linked to you personally and are measured only in the aggregate.

Web beacons are invisible files that are placed on websites you visit. If you visit a page on a website that contains a web beacon, it contacts your computer to determine whether you have previously visited that page or seen a particular advertisement. Web beacons do not record your email address or any other personal information.

The use of this information helps the Copyright Holder to make the Website as convenient and useful as possible for you, to maintain, protect and develop the Website services. Restrictions under the Privacy Policy

In accordance with the terms of the Privacy Policy, you must comply with the following rules when using the website:

- do not use the website inappropriately. In particular, do not try to influence or interfere with its operation or access information through a non-standard interface;
- use the website only in accordance with Ukrainian law;

If you violate this Privacy Policy or if the Copyright Holder reasonably suspects you of doing so, it may suspend or completely deny you access to the Website.

The Copyright Holder may review and update this Privacy Policy at any time. You are bound by these changes and should visit this page from time to time to review the current version of the Privacy Policy.

Additional information and disclaimers

The Copyright Holder takes measures to ensure that the information on this website is accurate. However, the Copyright Holder does not assume any responsibility and does not guarantee that the information and data provided are accurate, objective and up-to-date at the time of viewing.

This website as a whole and its individual elements such as (but not limited to) design elements, copyrighted photographs, articles, program code, databases are protected by the Law of Ukraine "On Copyright and Related Rights", International regulations, and other acts of Ukrainian legislation. Any other use, except for viewing, downloading and printing of the portal pages for personal, non-commercial use, is prohibited. Information from the site may

be copied only for non-commercial purposes for posting on user pages, blogs, social networks with a link to the original source.

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The copyright holder shall not be liable for any direct or indirect losses incurred in connection with the payment of penalties, or any losses and expenses incurred as a result of entering into a legal agreement, the information about the object of which was posted on this site.

Your actual use of the resource is at your own risk.

To the maximum extent permitted by law, neither the Copyright Holder nor any other party involved in the creation, production or maintenance of the site shall be liable for any direct, indirect or incidental damage that may have been caused by your access to, use of or reliance on this site, even if we have warned you of the possibility of such damage and loss.

In no event will Yuriy Povarov be liable to any party for any direct, indirect, intentional or consequential damages for any use of this website or any other interconnected website, including, without

limitation, any loss of profits, goodwill, loss of programs or other data on your information processing system, even if the copyright holder has been promptly informed of the possibility of such damages.

While using the website, you are not granted any intellectual property rights to the website itself, its content, or any branding elements or logos of the website.

I agree with the Privacy Policy and the User Agreement (public offer) of the website, as well as with the transfer and processing of my data.

I confirm that I am of legal age and that I do not have any acts restricting my legal capacity.