

## PRIVACY POLICY

***Last updated:*** 01.12.2025

This document sets out how we use, process and protect your Personal Data you give us when using our Website <https://astroway.life/> and our Services.

**We** are the **Contractor, ABCMobile OÜ**, a company incorporated under the laws of Estonia, Reg. No 14710834, VAT: EE102157534, located at: Harju maakond, Tallinn, Lasnamäe linnaosa, Peterburi tee 71, 11415, Estonia, acting based on the state registration certificate of a legal entity, providing Services specified in the Offer.

**You** are the **Client**, any natural or legal person represented by an authorised representative, or individual entrepreneur, possessing the necessary legal capacity (personality) and intending to enter into a legal relationship with us for the provision of Services under the conditions set out in the Offer.

**Our Services** are providing the Client with an access to information materials posted on the Website in accordance with and subject to the conditions prescribed in the Offer.

**Our Website** is <https://astroway.life/> .

**Our Offer** is published on the Website <https://astroway.life/terms> .

We act in your interest and we are transparent about the processing of your Personal Data. That means we are committed to protect and safeguard any Personal Data you give us.

This Policy applies to all Personal Data we collect through Website and during Services provision.

We might amend the Privacy Policy from time to time. If you want to know about your privacy, visit this page regularly to know exactly where you stand. If we make changes to the Privacy Policy which will have any significant impact on you (e.g. if we intend to process your Personal Data for other purposes than communicated in this Policy), we will notify you of these changes before the new activities begin.

This Privacy Policy and any issues related to the protection of Personal Data are governed by the EU GDPR REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data) and Estonian law.

**Personal Data** means any information relating to you and mentioned in section 1 of this Policy.

Any Personal Data provided by you with which you can be identified when using the Website and our Services, will be used in accordance with this Privacy Policy.

This Policy sets out the following:

1. What Personal Data we collect;
2. How the Personal Data is used by us;
3. How do we store and maintain Personal Data
4. Disclosure;
5. Cookies;
6. Your rights;
7. Contact details.

### **1. What Personal Data we collect**

Personal Data collected by us is necessary to provide Services to you and also optimise and develop our Services. Personal Data can be collected when you use the Website and/or our Services.

Personal Data we collect may include:

1. Your name;
2. Gender;
3. Date/Time of birth (age);
4. Your weight and height;

5. Email address;
6. Telephone number.

In some cases, we also may collect and process the following Personal Data (depending on the type of Services): your habits (including harmful addictions); hobbies and fancies; food excesses; clothing, pastime preferences; your favourite music; sport and sporting performance; your skills, experiences; personality traits and personal skills; educational background; relationship status; place of living (city, country); professional occupation, place of work/study; fears; the favourite colour(s), country, city and other preferences, likes and dislikes; general information about wellbeing and other general data.

**NOTE:** We collect and use only general information about your health, excluding any data on your diagnosis, diseases, health tests, mental state and other anamnesis data.

In addition to this, we also collect automatic information from your phone, tablet / mobile device or other device you use to access our Website and Services. This may include the IP address, data that identifies your mobile device, device-specific settings and characteristics, the browser you are using, app crashes, social network accounts, other system activities, your language settings, location details.

**DISCLAIMER:** ALL INFORMATION AND/OR “ADVICES”, “TIPS”, “RECOMMENDATIONS”, “TESTS RESULTS”, “PREDICTIONS”, “FORECASTS”, “PERSONALIZED CONTENT” CONTAINED ON OUR WEBSITE AND SERVICES ARE PROVIDED FOR INFORMATIONAL AND/OR ENTERTAINMENT PURPOSES ONLY, AND SHOULD NOT BE CONSTRUED AS MEDICAL, LEGAL, FINANCIAL, PSYCHOLOGICAL AND ANY OTHER PROFESSIONAL ADVICE ON ANY SUBJECT MATTER. WE DISCLAIM ALL LIABILITY IN REGARDS TO ACTIONS TAKEN OR NOT TAKEN BASED ON ANY OR ALL OF THE CONTENTS PROVIDED ON OUR WEBSITE AND DURING OUR SERVICES RENDERING. NOTE THAT WE DO NOT NECESSARILY ENDORSE AND ARE NOT RESPONSIBLE FOR, ANY THIRD-PARTY CONTENT THAT MAY BE ACCESSED THROUGH THE WEBSITE.

## **2. How Personal Data is used and processed by us**

2.1. Personal Data is used and processed by us for the following purposes:

1. To improve and provide better Services

We provide our Services from our local offices in different languages, and we are here to help 24 hours a day, 7 days a week. Sharing your relevant details our customer service staff allows us to respond when you need us – including responding to any questions you might have about Services.

1. To personalise Services to you

The main goal here is to optimise and customise our Services to your needs, making them easier and more enjoyable to use.

1. To verify that you are above the age limit to use Services

We offer Services which are not directed for children under 18 years old. For children younger than 18 years old, the use of our Services is only allowed with the valid consent of a parent or a guardian. If we become aware that we process Personal Data of a child under 18 years old without the valid consent of a parent or guardian, we reserve the right to delete it.

1. To interact with you and update you on news, important notices (offers & promotions) via mail, email, phone or text message/SMS

When you use our Services, we may send you messages with “login” and “password” to access the Website and Services. In addition to that we may send you a questionnaire or invite you to submit a review about your experience with our Services and other content. If you do not wish to be contacted about our offers, promotions or news, you can unsubscribe from our emails, text message/SMS by notifying us about it.

1. To prevent fraud (promotion of a safe and trustworthy service)

In order to create a trustworthy environment for you, we might use your Personal Data for the detection and prevention of fraud and other illegal or unwanted activities. Similarly, we might use Personal Data for risk assessment and security purposes, including the authentication of users. For such purposes, we might have to stop all or certain Services provision or put provision of all or certain Services on hold until we have finished our assessment.

1. To conclude, fulfil and enforce the Offer, the Agreement (the Contract), the Return and Refund Policy and this Privacy Policy
2. To contact you when we believe it is necessary
3. To detect and prevent abuse and illegal activity, including, but not limited to, misappropriation, infringements, to identity theft and other illegal activities and misuse of Services
4. To handle breakdowns and malfunctions
5. To take any action in any case of dispute, or legal proceeding of any kind between you and us, or between you and other customers with respect to, or in relation with Services
6. To help improve the safety and reliability of our Services

This includes detecting, preventing, and responding to security risks, and technical issues that could harm us, our customers, or the public.

1. To comply with regulatory requirements

Personal data submitted is sent to and stored on secure servers located in the European Economic Area according to GDPR.

1. To research, analyse, update or enhance Services we provide
2. For analytical purposes and measurement to understand how our Services are used

This is part of our mission to improve our Services and enhance the user experience, but can also be used for testing purposes, troubleshooting, and improving the functionality and quality of our Services and Website. We use pseudonymized data for analytical purposes.

2.2. And if you contact us, we may keep a record of your request in order to help solve any issues you might be facing.

2.3. We will ask for your consent before using your Personal Data for a purpose that is not covered in this Privacy Policy.

### **3. How we store and maintain Personal Data**

#### **A. THE MANNER OF PROTECTING YOUR PERSONAL DATA**

1. We undertake to protect any Personal Data you provide us. We undertake to do everything to protect Personal Data against any violations and abuses.
2. Taking into account the state of the art, the costs of implementation and the nature, scope, context, purposes of processing as well as the risk of varying likelihood and severity for your rights and freedoms, we shall in relation to the Personal Data implement appropriate technical and organisational measures to ensure a level of security appropriate to that risk, including, as appropriate, the measures referred to in Article 32(1) of the GDPR or other applicable data protection laws. In assessing the appropriate level of security, we shall take into account, in particular, the risks presented by processing, especially arising from a Personal Data breach.
3. The Personal Data is kept in a written form (in personal folders, in locked cabinets) and/or in computerised form. Our computer systems are protected by technical and organisational measures that prevent accidental or deliberate destruction, loss, damage, alteration and unauthorised disclosure or access to Personal Data.
4. Among other things, technical and organisational measures that we use to protect Personal Data include:
5. regular backup of copies, which are properly protected,
6. limitation of access to Personal Data,
7. care for the education of employees in the field of Personal Data protection and supervision over the work of employees.
8. After the expiry of the retention period or the withdrawal of the given consent, the Personal Data (including any copies) shall be immediately irretrievably and permanently deleted. Any carriers of Personal Data where these data are located shall also be destroyed/permanently deleted.
9. In the event of a Personal Data breach, we will immediately inform the competent supervisory authority of the violation. If, in the event of a Personal Data breach, a suspicion could arise that a criminal offence was committed, we will immediately notify the police or the competent prosecutor's office.

10. In the event of a Personal Data breach where there is a high risk to your rights and freedoms, we will inform you of such a breach without undue delay.

## **B. RETENTION PERIOD**

1. We will retain your personal data for as long as we deem it necessary to enable you to use our Services and the Website, to provide our Services to you (including maintaining your personal profile (account), if created), to comply with applicable laws, resolve disputes with any parties and otherwise as necessary to allow us to conduct our business, including to detect and prevent fraud or other illegal activities. All Personal Data we retain will be subject to this Privacy Policy.
2. With regard to the collection and processing of Personal Data on the basis of a contract, the time period for the retention of data is the entire period of the validity of the contract, including warranty or any other time periods arising from the concluded contract.
3. With regard to the collection and processing of Personal Data on the basis of your explicit consent, we will keep Personal Data permanently or until the withdrawal of the consent. If the purpose for which we have processed Personal Data is fulfilled, we will delete the Candidate's Personal Data even if the Candidate does not withdraw the consent.
4. If you have a question about a specific retention period for certain types of Personal Data we process about you, please contact us using the contact details provided below.

## **C. LEGAL BASES FOR THE USE OF PERSONAL DATA**

1. We process your Personal Data for the purposes described in this Privacy Policy, based on the following legal grounds:
2. the law - we process Personal Data when it is required to do so by the laws;
3. contractual or pre-contractual relationship - when Personal Data is not processed on the basis of the law, the contractual or pre-contractual relationship with us can serve as the basis for the processing of Personal Data;
4. your explicit consent - we shall ask you to give explicit consent so we can use your Personal Data for purposes defined in this Policy, and forward it to third parties, referred to in this Policy, for purposes defined in this Policy.

5. Before submission and processing any Personal Data, we shall ask you and you shall give to us explicit consent for the processing in accordance with this Policy all your Personal Data subsequently submitted. You are obliged to provide us with Personal Data that we collect and process on the basis of the data protection laws.
6. The submission of Personal Data for the entry into (and execution) of a contract is voluntary. Nevertheless, we warn you that if you do not provide Personal Data that we absolutely need to provide a service, we cannot provide you with such services.
7. When processing Personal Data on the basis of your explicit consent, the provision of Personal Data is always voluntary and without any negative consequences for you. Nevertheless, we warn you that we will not be able to provide you with certain services without your consent or after the withdrawal of your consent.

#### **4. Disclosure of Personal Data**

1. We keep your Personal Data in our records available to you.
2. We shall take reasonable steps to ensure the reliability of any of our employees, agents or contractors who may have access to Personal Data, ensuring in each case that access is strictly limited to those people who need to know / access the relevant Personal Data, as strictly necessary for the purposes of this Policy, and to comply with data protection laws in the context of their duties to us, ensuring that all of them are subject to confidentiality undertakings or professional or statutory obligations of confidentiality.
3. We can forward (disclosure) Personal Data to the following recipients:
4. to our affiliated companies and/or to the third parties for purposes of processing set out in this Policy;
5. to suppliers and service providers in connection with the normal operation of our business activities and (or) with carrying out functions on our behalf including, but not limited to service delivery, marketing assistance, data analysis, customer service provision, which may require access to your Personal Data, and also the Processors providing certain services to us;
6. to the public administration bodies and the courts when required by law.
7. Personal Data submitted may be transferred by us to our affiliated companies and/or to the third parties, which may be situated outside the European Economic Area and may be processed by staff operating outside the European Economic Area.
8. By submitting Personal Data via the Website, you agree to this storing, processing and/or transfer your Personal Data outside the European Economic Area.



9. In our affiliated companies Personal Data are processed only by people who are authorised by them to process Personal Data. The authorisation can be explicit (for example, given by the director or the head of the department) or general (such authorisation is evident from the description of the tasks of a particular position). The access to Personal Data shall be limited to those employees, agents or contractors of any of our affiliated companies who need access to Personal Data to perform their work. All employees, agents or contractors of any of our affiliated companies who have access to Personal Data are obliged to protect the Personal Data they process.
10. We shall take reasonable steps to ensure the reliability of third parties and other recipients referred to in this section of the Policy, who may have access to the Personal Data, ensuring in each case that access is strictly limited to the purposes of this Policy, and to comply with data protection laws and the Policy, ensuring that all third parties and other recipients are subject to confidentiality undertakings or professional or statutory obligations of confidentiality.
11. When we forward Personal Data to third parties and other recipients referred to in this section of the Policy, it is provided in the scope and in the manner prescribed by data protection laws and the Policy. Personal Data may also be processed by them outside the European Economic Area, including in some countries that may not provide the same level of personal data protection as it applies within the European Economic Area. In accordance with the relevant data protection laws, we will take appropriate measures to ensure that Personal Data remains secure and safe in every transfer. We will set out these measures by concluding appropriate contractual frameworks that will define the protection of Personal Data.
12. We disclose personal data to law enforcement insofar as it is required by law or is strictly necessary for the prevention, detection or prosecution of criminal acts and fraud or if we're otherwise legally obliged to do so. We may need to further disclose Personal Data to competent authorities to protect and defend our rights or properties, or the rights and properties of our business partners.
13. Recipients of Personal Data corresponding to this section of the Policy include: ChatGPT and Google. The processing and use of Personal Data by ChatGPT and Google are carried out in accordance with the Privacy Policies posted on the websites of ChatGPT and Google: <https://openai.com/policies/privacy-policy> and <https://policies.google.com/privacy>. By agreeing to the Policy, you confirm that you have read and fully agree with the Chat GPT and Google Privacy Policies. For the purposes of this Policy and the provision of our related services, the above-mentioned Chat GPT and Google Privacy Policies are integral parts of the Policy in the event of transfer of Personal Data to Chat GPT and Google for processing and/or use. Your consent to this Policy also constitutes your consent with the Chat GPT and Google Privacy Policies.

14. We have the right to transfer Personal Data also to other recipients (users) of Personal Data, not mentioned in this clause, corresponding to this section of the Policy, when it is consistent with the purposes of this Policy.

## 5. Cookies

1. Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our Website, we may collect information from you automatically through cookies or similar technology.

### How do we use cookies?

1. We use cookies in a range of ways to improve your experience on our Website and Services, including:
2. Keeping you signed in your Personal Profile (Account);
3. Understanding how you use our Website;
4. Improve and providing better Services;
5. Personalising Services to you;
6. Detecting and preventing illegal activities and misuse of Services;
7. Handling breakdowns and malfunctions;
8. Improving the safety and reliability of our Services;
9. Sharing with third parties for advertising purposes.

### What types of cookies do we use?

1. Our Website uses the following types of cookies:
2. **Strictly necessary cookies** - these cookies are essential for you to browse our Website and use its features, such as accessing secure areas of the site. These cookies will generally be first-party session cookies.
3. **Functionality cookies** - these cookies allow our Website to remember choices you have made in the past, like what language you prefer, what region you are from, or what your user name and password are so you can automatically log in.

4. **Performance cookies** - these cookies collect information about how you use our Website, like which pages you visited and which links you clicked on. None of this information can be used to identify you. It is all aggregated and, therefore, anonymized. Their sole purpose is to improve our Website functions.
5. **Marketing cookies** - we use these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, your IP address, time and/or length of your visit, the pages of the Website you visit, browsing info, operating system, internet service provider, carrier, timestamp, whether you have responded to an advertisement, the referring URL, features used or activities engaged in within the Website and other data. We sometimes share some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

### **How to manage cookies**

1. You can set your browser not to accept cookies, and you could remove cookies from your browser. All cookies, except those strictly necessary for the functioning of the Website, are used by us only after receiving your consent to use cookies. This consent can be revoked in the settings of our Website and/or by sending us a corresponding request by e-mail, specified in this Policy. You can use our Website and Services without giving us consent to accept cookies. However, in a few cases, some of our Website features may not function as a result.

### **6. Your rights**

1. We enable you to exercise all of the rights related to the processing of Personal Data. You can request us to:
2. confirm whether your Personal Data is processed or not;
3. request information about what Personal Data we processes, about the source of Personal Data;
4. ask any questions about the confidentiality of Personal Data, the manner of collecting and processing of Personal Data, exercising the rights related to Personal Data processing;
5. enable the access to Personal Data, when we confirm that Personal Data is being processed;

6. allow rectification of inaccurate or incomplete your Personal Data. We ask you to inform it of any change in Personal Data as soon as possible, as this is the only way to ensure the accuracy and integrity of the Personal Data that the we keep;
7. enable the right to delete Personal Data (i.e. the right to be forgotten). The right to the erasure of Personal Data is limited. We cannot delete Personal Data that it processed on the basis of the law or on the basis of a contractual relationship (including any warranty and other time periods that may arise from a particular contract);
8. enable the right to the restriction of processing, when it is possible;
9. allow the right to object to the processing. The right to object to the processing of Personal Data is limited to the processing for the purposes of direct marketing, including profiling;
10. enable to receive Personal Data provided to us in a structured, commonly used, machine-readable form;
11. enable the right to Personal Data portability and provide Personal Data in a structured, commonly used and machine-readable form to another controller;
12. allow the right to withdraw consent where Personal Data is processed on the basis of consent, whereby the withdrawal of the consent does not affect the legality of the processing of Personal Data that was carried out prior to its withdrawal. The consent may be withdrawn by you in written form through e-mail or postal mail. The withdrawal of consent does not create any negative consequences for you. It may happen that after you withdraw your consent, we will not be able to provide you with certain services if these services are of such a nature that we cannot perform them without the transmission of Personal Data.
13. You have the right to file a complaint against us in regard to Data Protection Laws to the relevant supervisory authority, which is the National Data Protection Authority in Estonia.
14. You can exercise your rights by contacting us by e-mail mentioned in the Policy with the mark "Personal Data protection" in the subject line. We undertake to respond to your requests without undue delay, and at the latest within the statutory deadlines.
15. For any of your requests in regards to this Privacy Policy and to exercise any of your rights or if you have a complaint, you can contact Us at [support@abcmobile.com](mailto:support@abcmobile.com) for further details.
16. If you want to object to the processing of your Personal Data on the basis of legitimate interest and no opt-out mechanism is available to you directly, you can contact us at [support@abcmobile.com](mailto:support@abcmobile.com).

## **7. Contact details**

1. We control the processing of Personal Data as described in this Privacy Policy.
2. If you have any questions about this Privacy Policy or our processing of your Personal Data, or if you believe that your privacy has been compromised in the course of using the Services and/or Products, please contact Us at [support@abcmobile.com](mailto:support@abcmobile.com) and we'll get right back to you.
3. All your requests to us regarding this Private Policy will be processed and answered by us within no later than 30 (thirty) days from the date of our receipt of the relevant request.