

Date: September 05, 2022.

Last Updated: September 05, 2022.

DATA PROTECTION AND PRIVACY POLICY

1. Policy Acceptance

This Data Protection and Privacy Policy, as may be amended from time to time (the "Policy"), describes and summarizes the policies and procedures of YOUCONTROL, LTD ("we", "our" or "us") with respect to the processing of User's ("you" or "yours") personal data ("Personal Data") provided or acquired through the use of our website located at youcontrol.academy, expressly including any content, functionality, and services offered on or through it (the "Website").

Please read this Policy carefully before you start using the Website. By accessing the Website, you agree to be bound by this Policy. If you do not agree to the above, you must not use the Website.

2. General Conditions

For the purpose of this Policy, Personal Data shall have the meaning given in the EU General Data Protection Regulation ("GDPR"), California Consumer Privacy Act ("CCPA") and other applicable legislation (collectively, "Applicable Data Protection Laws"). We may collect certain Personal Data from you solely in the scope, for the purposes and under conditions described in this Policy. If opting not to share such information, you may not be allowed access to certain features of this Website.

The protection of your Personal Data is of supreme importance to YOUCONTROL, LTD. We are committed to maintaining the security, confidentiality and integrity of Personal Data in our custody and control, and protecting such data in accordance with the Applicable Data Protection Laws. We regularly reevaluate our privacy and security practices and adapt them as necessary to deal with new regulatory requirements, changes in legislation, our services and/or industry standards.

3. Collecting Personal Data

The information we collect, when you register for an account on this Website or update it, include:

- Your email address;
- Your first and last name;
- Your job position;
- Date and time you registered;
- Any other data you decide to share with us.

When you use this Website, we may also collect the name of your internet service provider, the website from which you visited this Website, the parts of this Website you visit, the date and duration of your visit to this Website, information about the device you used during your visit to this Website (device type, operating system, screen resolution, language, country you are located in, web browser type and version, connection type and settings, IP address, crash data etc.).

In the case of emails from us, we may use certain analytics tools, to capture data such as when you open our email or click on any links or banners our email contains.

We do not knowingly collect Personal Data relating to children. By providing your Personal Data, you represent that you are 18 years of age or older. If we learn that we have collected Personal Data from anyone under 18 years of age, we will take steps to promptly delete such information.

YOUCONTROL LTD is headquartered in Ukraine. If you are located outside Ukraine, your information is collected in your country and then transferred to Ukraine — or to another country in which we (or our affiliates or service providers, where applicable) operate. If you are from one of the European Union/European Economic Area countries, you should be informed that the European Commission hasn't determined Ukraine as a country that offers an adequate level of data protection, which entails certain risks of losing the protection provided under the GDPR when your Personal Data is transferred outside of the European Union/ European Economic Area.

4. Processing Personal Data

Administering Account: We use your Personal Data to ensure your use of this Website, expressly including any content, functionality, and services offered on or through it, authenticating you when you log in on this Website, and provide you with user support, etc.

Research & Development: We are always looking for ways to make the Website better, smarter, more efficient, more secure and more useful to you. We use collective learnings about how Users use the Website, and feedback provided directly to us, to troubleshoot and identify areas for improvement. We may occasionally conduct research and analysis of Users' behavior to improve the Website.

Communicating with You: We may use your contacts to send you occasional informational newsletters, aimed at driving engagement and maximizing what you get out from using this Website. Except for the cases where we are required to do so by law (for instance, notifying you of a data breach) or for providing to you a normal usage of the Website, you may opt out of these communications by contacting us at the email address specified in the "Contact Us" Section below.

Safety & Security: We use collected information to verify your account and activity, to monitor suspicious or fraudulent activity and to identify violations of our Terms of Use and other policies.

Ensuring Legal Compliance: Where required by law or necessary to protect our legal rights, interests and the interests of others, we may use collected information in connection with legal claims, compliance, regulatory requirements and required disclosures.

Sharing & Transferring. In exceptional circumstances, we may share your information about third parties, if we believe that sharing is reasonably necessary to:

- Comply with any applicable law, regulation, legal process or governmental request;
- Enforce agreements policies and terms of service;
- Protect the security or integrity of this Website;
- Protect our Users or the public from harm or illegal activities;
- Respond to an emergency which we believe in good faith requires us to disclose information to assist in the prevention of a death or serious bodily injury of any person.

We retain collected information for as long as your account is active. You may cancel your account by contacting us at the email address specified below in this Policy. We will delete or anonymize information collected from you upon deletion of your account, unless:

- We must keep it to comply with or as an evidence of our compliance with applicable law;
- There is an outstanding issue, claim or dispute requiring us to keep the relevant information until it is resolved;
- The information must be kept for our legitimate business interests, such as fraud prevention and enhancing Users' safety and security.

5. Legal Basis for Processing

Our legal basis for processing your Personal Data depends on the purposes of the processing. YOUCONTROL, LTD will collect and process your Personal Data based on the following legal bases:

- We need it for you to be able to fully access the Website, expressly including any content, functionality, and services offered on or through it;
- You give us your fully explicit, informed, specific, and unambiguous consent to do so for the specific purposes described in this Policy;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote our services, and to protect our legal rights and interests;
- We need to process your Personal Data to comply with a legal obligation.

6. Protecting Personal Data

We keep your Personal Data secure:

- By implementing and maintaining commercially reasonable measures to protect against unauthorized access to and unlawful interception or processing of Personal Data;
- By following internal policies of best practice and training for staff;
- By using SSL technology when Personal Data is submitted to us online.

7. Your Privacy Rights

As a data subject, you have certain rights in relation to your Personal Data.

Right of Access: If you ask us, we will confirm whether we are processing your Personal Data and, if necessary, provide you with a copy of such data (along with other details). There are some limitations and exceptions concerning this right: for example, where information is legally privileged, or if providing you with the information would reveal any Personal Data of another person.

Right to Data Portability: In certain circumstances, you have the right to receive your Personal Data provided by you to us and reuse it elsewhere, or send such data to another organization; this is regarding where our lawful basis for processing the Personal Data is consent or necessity for the performance of our contract with you, and the processing is carried out by automated means.

Right to Rectification: You may require us to update or correct any inaccurate Personal Data, or complete any incomplete Personal Data concerning you. If you do so, we will take reasonable steps to check the accuracy and correct your Personal Data. Please let us know if any of your Personal Data changes so that we can keep it accurate and up-to-date.

Withdrawal of Consent: If we rely on your explicit consent as our legal basis for processing your Personal Data, you have the right to withdraw that consent at any time by contacting us at the email address specified in the “Contact Us” Section below. Your withdrawal of consent does not affect the lawfulness of processing based on your consent before its withdrawal.

Right to Object: You can ask us to stop processing your Personal Data and we will abide so, if we are:

- Relying on our legitimate interest to process your personal data, except if we can demonstrate other compelling legal grounds for the processing; or
- Processing your personal data for direct marketing purposes.

Right to Erasure: You can ask us to delete your Personal Data in some circumstances, for instance if you withdraw your consent. For situations where, under the Applicable Data Protection Laws, we fulfil your request, YOUCONTROL, LTD will delete your Personal Data without undue delay. If you are entitled to erasure and if we have shared your Personal Data with others, we will let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your Personal Data with, so that you can contact them directly.

Right to Restriction: You can ask us to ‘block’ or suppress the processing of your Personal Data in certain circumstances (such as where you contest the accuracy of that data or you object to us), so that

we no longer process that Personal Data until that restriction is lifted. If you are entitled to restriction and if we have shared your personal data with others, we will let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your Personal Data with, so that you can contact them directly.

Rights in Relation to Automated Individual Decision-Making, Including Profiling: You have the right to be free from decisions based solely on automated processing of your Personal Data, including profiling, unless these are necessary for entering into, or the performance of, a contract between you and us, or unless we do so based on your explicit consent (still such consent can be withdrawn).

Right to File a Complaint: If you have a concern with respect to the way we process your Personal Data, you can report it to the relevant supervisory authority.

Please note that these rights are not absolute and in certain cases are subject to conditions as specified in the provisions of Applicable Data Protection Laws. For instance, it may happen if we have an overriding interest or legal obligation to continue to process your personal data.

You can exercise the above rights, where applicable, by contacting us directly at the email address specified in the “Contact Us” Section below. We will respond to your request within the statutory period and typically seek to resolve the matter within 1 month. We will require you to provide satisfactory proof of your identity in order to ensure that your personal data is disclosed only to you.

8. Miscellaneous

We may amend this Policy from time to time, in which case the new Policy will supersede prior version. Changes will be communicated through updates on this Website. We recommend that you regularly access this Website to ensure that you agree with any changes or amendments hereto. If you disagree with any of the changes to this Policy, you shall stop using this Website immediately.

If any provision of this Policy is held by a court of competent jurisdiction to be invalid, illegal or unenforceable for any reason, such provision shall be eliminated or limited to the minimum extent such that the remaining provisions of this Policy will continue in full force and effect.

9. Contact Us

If you have questions regarding this Policy or our use of your Personal Data, or would like to make a request under this Policy, please contact us at:

YOUCONTROL, LTD,
11 Yevhena Sverstyuka Str.,
of. 515, Kyiv 02002, Ukraine

education@youcontrol.com.ua