



## THE PRIVACY POLICY

This Privacy Policy aims to inform and assure you that SIA “Perfluenc” (hereby refer to as “**Perfluenc**” or “**Company**” or “**we**”) handles your Personal Data (as defined below) with respect to your personality and your rights and in accordance with General Data Protection Regulation (EU) 2016/679 of 27 April 2016 (“GDPR”) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “**Regulation**”).

For the purposes of "GDPR" Perfluenc is the "controller", i.e. the person which determines the purposes and means of the processing of your personal data.

This Policy addresses to all natural persons which wish to contract with us or to establish a business relationship, Clients, Client’s ultimate beneficial owners/directors/shareholders/secretaries/authorized bank signatories/attorneys (attorneys appointed by virtue of powers of attorneys), and/or members of another legal entity and/or natural persons who have a business relationship with Perfluenc and/or with Clients of Perfluenc.

This Privacy Policy applies to all of the services offered by Perfluenc and its Affiliates, and services offered on third-party sites (**Advertisers**).

"**Affiliates**" shall mean any company or other business entity controlled by, controlling, or under common control with Perfluenc, either within or outside the European Economic Area.

“**Client**” or “**Clients**” shall mean a natural and/or legal person that using the **system “Perfluenc”**.

“**Personal Data**” means any information about you, that could identify you directly or indirectly, such as the personal information described in paragraph 3.1. below.

“**Processing**” means any operation or set of operations which is performed on Personal Data, by automated means or otherwise, including collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“**System “Perfluenc”**” means the software <http://perfluenc.io/> for the promotional activities.

“**Advertiser**” means natural or legal person that is registered in the system “Perfluenc” aimed to promote a product, service or event in order to target customers.

We ask you to read this Privacy Policy carefully as it contains important information on who we are, how and why we collect, store, use and share your Personal Data, your rights in relation to your Personal Data and on how to contact us and the supervisory authorities in the event that you have a complaint.

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| 1. Who we are                                                                | SIA “Perfluenc”<br>Latvia, Talsu šoseja 31 k-7 - 16, Jūrmala, LV-2016<br><br>Data Protection Officer (DPO):<br>E-mail: k@perfluenc.io                                                                                                                                                                                                                                                                                                                                                                        |
| 2. Our sources of collecting Personal Data and the Personal Data we process. | We process Personal Data that you provide to us in the course of our advertising services and promotional activities. For this purpose, we process and collect Personal Data that we receive from you and/or the Authorised Officials appointed from you and/or our Affiliates and/or third parties authorised or instructed by you. We may also collect and process Personal Data from databases and/or sources that are publicly accessible, such as the press, the media and/or third parties in order to |

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|                                                                                                               | <p>enable us to comply with our regulatory obligations. We process Personal Data that we collect lawfully and that we are permitted to process.<br/>         Information we collect from our Clients mainly includes the following:</p> <ul style="list-style-type: none"> <li>• Name, surname, date, city and country of birth, identity/passport number, age, gender, address and your tax identification number;</li> <li>• Contact details: phone number and e-mail address, login and password in your social networks, power of attorney, signature;</li> <li>• Bank account details: bank name, bank address, BIC, SWIFT, IBAN, account number, card account number,</li> <li>• Technical data: Internet Protocol address (IP address), your registration data, type and version of your browser, settings of time zone and location, type and version of browser plug-in, operation system and platform;</li> <li>• Profile data: user name and password, your preferences, comments and answers in surveys;</li> <li>• Usage data: information about how you are using our web-site, products and services;</li> <li>• Advertising data: your preferences in receiving marketing information from us and third parties.</li> </ul> <p>Please note that the data we collect vary among the different services we provide.</p> |
| <p>3. The purpose for processing your Personal Data and the legal ground of this processing.</p>              | <p>We collect and process Personal Data in full compliance with the provisions of the Regulation as well as the national legislation.<br/>         In the paragraphs below (3.1 to 3.4) there is a more detailed analysis of the purposes and the legal ground of the processing.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p>3.1 For the performance of a contract (Article 6 (1) (b))</p>                                              | <p>The processing of Personal Data is necessary in order for us to be able to provide our advertising services to you in accordance with our engagement letter/contact and/or to fulfill your orders and/or to provide you with related services.<br/>         The purposes of the processing are adjusted according to the nature of the service provided.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p>3.2 For the purposes of the legitimate interests pursued by us or by a third party (Article 6 (1) (f))</p> | <p>Except for the above case, either we or third parties, process your Personal Data when necessary, except if your fundamental rights and freedoms override the below interests.<br/>         The main purposes of processing your Personal Data are the following:</p> <ul style="list-style-type: none"> <li>• Identification your personality in the use the system “Perfluenc”,</li> <li>• Granting you the access to the system “Perfluenc”,</li> <li>• Contacting you in case of necessity including sending notifications, requests and information concerning the usage of the system “Perfluenc”, rendering services and processing requests and orders from you,</li> <li>• Improvement the quality of the system “Perfluenc, the usability and the programme development,</li> <li>• Statistic research from anonymous data,</li> <li>• Identification your location for your security and fraud prevention,</li> <li>• Validation your Personal Data,</li> <li>• Providing you with advertising materials by sending this information to your e-mail,</li> <li>• Participation in the enabling activities of the system “Perfluenc”/Clients of the system “Perfluenc”.</li> </ul>                                                                                                                                        |

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| <p>3.3 Data collection methods</p>                     | <p>Perfluenc uses the following data collection methods:</p> <ol style="list-style-type: none"> <li>1. <i>Direct interaction.</i> You are entitled to provide your Personal Data by filling the form or contacting us via e-mail, phone or through other means as the following:           <ul style="list-style-type: none"> <li>• Registration in the system “Perfluenc”,</li> <li>• Conclusion of the contracts with Perfluenc;</li> <li>• Filing requests or complaints,</li> <li>• Interaction with Perfluenc via social media,</li> <li>• Subscription on services or mailings of Perfluenc,</li> <li>• Requests of adverting information,</li> <li>• Participation in promotional events or surveys,</li> <li>• Placement of comments.</li> </ul> </li> <li>2. <i>Automatic method.</i> Perfluenc is entitled to collect technical data about your equipment, actions when viewing pages and template. For collecting before mentioned information we use cookies which can be used on the websites of third parties.</li> <li>3. <i>Analysis of published sources.</i> Perfluenc collects the data from public information sources.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p>3.4 Cookies and similar technologies</p>            | <p>Perfluenc uses cookies for such purposes, as to remember your safe search preferences, to make the ads you see more relevant to you, to count how many visitors we receive to a page, to help you sign up for our services, to protect your data, or to remember your ad settings.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <p>4. Who we share your data with</p>                  | <p><b><i>Within Perfluenc</i></b><br/>       In the course of Perfluenc’s operation, the relevant employees responsible for the performance of our contractual and legal obligations receive the necessary data. Moreover, we might share your Personal Data within Advertisers and our Affiliates in other jurisdictions as in BVI, Cyprus and the Russian Federation, if this is necessary for the performance of our services and/or to fulfill your orders and/or comply with our regulatory obligations.</p> <p><b><i>Outside Perfluenc</i></b><br/>       Under Article 28 of the Regulation, we have the right to designate a processor. In such a case, it is likely that the processor will receive your Personal Data for the above purposes. For example, we might designate as processors, as well as companies that provide organizing and filing services or licensed service providers. Furthermore, Perfluenc is legally obliged and/or may need to transfer your Personal Data in the course of the provisions of our services to various government authorities and/or semi-governmental and/or services and/or organisations.</p> <p>It is possible for us to share your Personal Data to other people/companies/organisations, other than the above, in the course of the provisions of our services to you or if you have given us your express consent for such transfer.</p> <p>Sometimes we may re-address you to provide your payment information to our independent subcontractor to whom you shall have the right to disclose your private information under separate privacy policy terms, which are not connected to this Policy.</p> |
| <p>5. How long your Personal Data will be kept for</p> | <p>We will hold your Personal Data during our contractual relationship. After the termination of our contractual relationship, we hold your Personal Data for the period required by the applicable AML law and according to the other applicable law. Sometimes Perfluenc is obliged to process your Personal Data for an extended</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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|                                                                                              | <p>period for specific purposes, for example, in case of the requests of law-enforcement authorities for tax and legal purposes.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p>6. Transfer of your Personal Data outside the EEA or to an international organization</p> | <p>We may transfer your Personal Data to third parties which are located outside the European Economic Area (EEA), including but not limited to the following (as applicable), only if the transfer is necessary to perform our contractual obligations and/or to fulfill your orders.</p> <p>In any case, the processors in third countries are obliged to apply the Regulation in the same manner as the companies which are located within the European Economic Area.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p>7. Keeping your Personal Data secure</p>                                                  | <p>We have appropriate security measures in place to prevent Personal Data from being accidentally lost or used or accessed in an unauthorised way. We limit access to your Personal Data to those who have a genuine business need to have access to it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.</p> <p>We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <p>8. Your rights</p>                                                                        | <p>You have a number of important rights, under the Regulation. Specifically:</p> <p>(a) <b>right to access your Personal Data</b> (Article 15): meaning you might receive information and/or copy of the Personal Data we hold free of charge.</p> <p>(b) <b>right to rectification</b> (Article 16): you might ask us to correct any mistakes in your information which we hold.</p> <p>(c) <b>right to erasure</b> (“right to be forgotten”) (Article 17): you might ask us to erase the Personal Data concerning you.</p> <p>However, we reserve the right to deny the erasure, if the processing is necessary for compliance with a legal obligation, for reasons of public interests or for the establishment, exercise or defense of legal claims.</p> <p>(d) <b>right to restriction of processing</b> (Article 18): you might require us to restrict our processing of your Personal Data if you contest the accuracy of your Personal Data, the lawfulness of the processing, or you have objected to processing (according to article 21, see below) and you wait for our reply whether we have legitimate grounds which override yours.</p> <p>(e) <b>right to data portability</b> (Article 20): you have the right to request and receive the Personal Data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and you have the right to transmit those data to a third party under certain circumstances.</p> <p>(f) <b>right to object</b> (Article 21): <b>you have the right to object at any time to processing of Personal Data concerning you which is based on performance of a task carried out in the public interest or for the purposes of the legitimate interest pursued by us or third parties (article 6 (1) (e) and (f) of the Regulation).</b></p> <p><b>You also have the right to object at any time to processing of Personal Data concerning you for direct marketing or decisions being taken by automated means which procure legal effects concerning you or similarly significantly affect you.</b></p> <p>In case you exercise this right, we shall no longer process your Personal Data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claim.</p> |

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|                                                            | <p>(g) <b>right to withdraw your consent:</b> you reserve the right to withdraw your consent at any time. However, the withdrawal of the consent does not affect the lawfulness of the processing based on consent before its withdrawal.</p> <p>If you wish to exercise any of the above rights or to ask any questions or clarifications, please do not hesitate to contact us at <a href="mailto:k@perfluence.io">k@perfluence.io</a>.</p> <p>If you like to exercise any of those rights, please:</p> <ul style="list-style-type: none"> <li>• email or write to us</li> <li>• let us have enough information to identify you</li> <li>• let us have proof of your identity and address</li> <li>• let us know the information to which your request relates.</li> </ul> |
| 9. Managing, reviewing, and updating your information      | When you are signed in, you can always review and update information by visiting the services you use.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 10. How to complain?                                       | We hope that Perfluenc can resolve any query or concern you raise about our use of your information.<br>However, the Regulation also gives you right to logde a complaint with the supervisory authority.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 11. Are you obliged to provide us with your Personal Data? | You are required to provide your Personal Data to the extent that it is necessary to conclude, perform or terminate the engagement letter and/or contract between us and third parties and to fulfill your mandates.<br>Furthermore, we are obliged by the anti-money laundering legislation to collect and hold your Personal Data to the “know your client” principle. In case you refuse to give us your Personal Data, we will not be able to provide and/or continue to provide our services to you.                                                                                                                                                                                                                                                                    |
| 12. Automated individual decision-making                   | As a rule, Perfluenc does not make automated decisions. If we make use of automated decision-making, you will be properly informed if this is necessary on the basis of the relevant legislation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 13. Changes in this privacy policy                         | This Privacy Policy was published on 17.07.2020.<br>We may change this privacy policy from time to time and in such case we will inform you via email.<br>We also ask you to periodically visit our website for any updates of this privacy policy.<br>Please contact us, if you have any questions about this privacy policy or the information we hold about you at <a href="mailto:k@perfluence.io">k@perfluence.io</a> .                                                                                                                                                                                                                                                                                                                                                 |