

## 1. PERSONAL DATA PROVIDED AND PROCESSED

Company is responsible for the processing of Personal Data that User contributes to the Services and for Personal Data that Company collects in other ways with regards to the Services. ***For the purposes of this Policy, "processing" refers to any operation or set of operations performed on your personal data, whether by automated or manual means. This includes, but is not limited to, the collection, recording, storage, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment, restriction, erasure, or destruction of data. All processing activities are conducted in a manner that ensures your right to privacy and the protection of your personal data.***

### 1.1. Information You Provide Directly to Us.

(a) Contact Information. Information Company uses to contact you, including ***physical address***, email addresses and phone numbers.

(b) Identification Information. Information Company uses to identify you, including full name, ***surname***, government ID, passport, selfie ***or biometric data (use of facial image for video identification)***. ***A photo or video of your face is compared to an image of your identity document to make sure that the owner of the document is you.***

*Added with additional point : (i) Marketing Information: includes your preferences in receiving marketing from us and our third parties, also the information about how you use our services.*

## 4. SHARING USER'S PERSONAL DATA

*Amended as follows:*

4.1. Personal Data may be transferred to the following categories of processors of Personal Data:

***4.1.1. Contractual Counterparties:*** We may transfer your Personal Data to third parties engaged in the provision of our services, provided that such entities have undergone rigorous due diligence prior to the commencement of cooperation. Such counterparties may include entities involved in:

- *The execution and facilitation of payment transactions;*
- *Identity verification and authentication processes;*
- *The transmission of correspondence, notifications, and service-related communications;*
- *Technically suppliers, including server and hosting data centres;*
- *Marketing and promotional activities (where applicable), including the dissemination of offers and other commercial notifications.*

***4.1.2. Financial Institutions and Payment Service Providers:*** We may disclose your Personal Data to financial institutions, payment service providers and other third parties involved in:

- *The processing, execution and settlement of payment transactions.*

***4.1.3. Governmental Authorities and Law Enforcement Agencies:*** We may be legally obliged to disclose your Personal Data to governmental authorities, judicial bodies or law enforcement agencies, including:

- *State authorities and investigative bodies;*
- *Courts, sworn bailiffs, and sworn notaries;*
- *Prosecutorial and other competent law enforcement entities, as required by law.*

**4.1.4. Professional Service Providers:** *We may transfer your Personal Data to external professional service providers, including:*

- *Audit firms for the purposes of statutory and regulatory audits;*
- *Legal advisers and law firms in connection with legal consultations and representation;*
- *Certified translators and language service providers where required for legal or operational purposes.*

**4.1.5. Client Developer's:** *We may transfer your Personal Data to Client Developer, such as your registration and profile information.*

Amended us follows:

**4.2.** *Company operates worldwide, and therefore, Company may transfer User's data to Company's counterparties (partners, affiliates, etc.) in different countries. User's Personal Data may be stored, transferred, and otherwise processed in countries outside of the User's residence, without the same level of data protection laws as the United States, or those not recognized by the European Commission as having an adequate level of data protection.*

*Where Personal Data is transferred outside the European Economic Area (EEA) with applicable data transfer restrictions, the Company will ensure that appropriate safeguards are implemented in accordance with applicable data protection laws. Such safeguards may include, but are not limited to:*

- *transfers to countries that have been recognized by the European Commission as providing an adequate level of data protection;*
- *the implementation of Standard Contractual Clauses (SCCs) approved by the European Commission or other lawful transfer mechanisms;*
- *reliance on other lawful transfer mechanisms permitted under applicable data protection laws.*

*These safeguards are designed to ensure that Personal Data remains protected in accordance with applicable data protection regulations, including the General Data Protection Regulation (GDPR).*

*Transfers of Personal Data outside the EU/EEA may take place based on one or more of the following legal grounds:*

- ✓ *The European Commission has determined that the recipient country or specific sectors within it ensure an adequate level of data protection;*
- ✓ *The transfer is covered by appropriate safeguards, such as standard contractual clauses, binding corporate rules, or legally binding agreements between public authorities;*
- ✓ *You have given your explicit and informed consent to the transfer;*

- ✓ *The transfer is necessary for the performance of a contract between you and our company, or to take steps at your request prior to entering into such a contract;*
- ✓ *The transfer is necessary for the performance of a contract concluded in your interest between us and another party (e.g. a service provider);*
- ✓ *The transfer is necessary for the establishment, exercise, or defense of legal claims;*
- ✓ *The transfer is necessary for important reasons of public interest recognized under EU or Cyprus law.*

Amended us follows:

**4.3.** *The Company may transfer, store, and process Personal Information in jurisdictions outside the State of California and outside the United States where the Company, its affiliates, service providers or business partners operate.*

*When the Company transfers Personal Information to third parties or service providers located outside the United States, it ensures that such transfers are carried out pursuant to written agreements that require the recipient to process Personal Information solely for specified business purposes and to implement appropriate safeguards to protect such information in accordance with applicable privacy laws. Personal Information transferred to other jurisdictions may be subject to the lawful access requirements of courts, law enforcement authorities or regulatory agencies in those jurisdictions. The Company will disclose Personal Information only where required by applicable law, valid legal process or with your consent.*

*The Company will respond to verifiable consumer requests in accordance with applicable law and will not discriminate against consumers for exercising their rights under the CCPA.*

## 7. USER'S RIGHTS

7.1. Taking into consideration the differences in data protection laws which may be applicable to User by virtue of User's citizenship, residence and other factors, usually, data protection laws grant the data subject (User) the following data protection rights which are applicable to this Privacy Policy and Personal Data processing by Company as well:

After the table add with following:

*If you have any complaints, questions or concerns regarding how we process your Personal Data, or if you would like further information about our Personal Data processing activities, please feel free to contact us at any time using the contact information provided below.*

*If you believe that your rights as a data subject have been violated or that your Personal Data is being processed incorrectly, and if cooperation with us cannot resolve the issue, you have the right to lodge a complaint with the relevant Data Protection Authority ("DPA"). For Cyprus, the DPA is the Commissioner for the Protection of Personal Data, which can be contacted via their website:*

*[https://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/home\\_en/home\\_en?opendocument](https://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/home_en/home_en?opendocument). You may lodge a complaint with the DPA in the jurisdiction where the alleged violation occurred, where the processing took place, or where you reside or work.*