

## PRIVACY POLICY

### 1. PREAMBLE

- 1.1. This Privacy Policy (hereinafter – the "Policy") applies to the relationships of PaynetEasy Technologies Limited, company number: 116094, incorporated under the laws of Gibraltar, whose registered office is at:10 Suite 5, 39 Irish Town GX11 1AA, Gibraltar (hereinafter - the "Operator", the entity responsible for the collection and processing of the personal data) and individual person (hereinafter - the "User" or "Users") after the filling them of the feedback form on the Operator's website: <https://lp.systems> (hereinafter – the "Website").
- 1.2. The Policy applies to the information that the Operator receives about Users during their use of the Website and the acquisition of Operator's software.
- 1.3. Upon disagreement with these terms and conditions the User shall refrain from using the Website as well as from the acquisition of the Operator's software.
- 1.4. This Privacy Notice does not cover the collection and use of your personal data on other Operator's websites, or any other information or communications that may reference Operator outside the Service.

### 2. THE USER'S INFORMATION RECEIVED AND PROCESSED BY THE OPERATOR

- 2.1. As a part of this Policy the "User's information" means:
  - 2.1.1. Name, patronymic and surname;
  - 2.1.2. Email address;
  - 2.1.3. Phone number;
  - 2.1.4. User's company (information about in which company User can may be employee or company affiliated with User);
  - 2.1.5. any another information is provided by the User independently during their filling of the feedback form on the Website.
- 2.2. The Policy is only applicable to data collection was carried out during the interaction of the User with the user interface posted on the Website. The Operator does not control and is not responsible for the third parties websites to which the User can click following links available on the Website. The Operator is not responsible for the information which can be collected or requested or to other actions of the User on the websites of third parties.
- 2.3. The Operator does not check reliability of User's information about the name, patronymic and surname and different information provided by the User. At the same time the Operator assumes that the User provides reliable and sufficient information about himself and keeps this information up to date.

### 3. THE PURPOSE OF GATHERING AND PROCESSING THE USER'S INFORMATION

- 3.1. When processing the User's data, the Operator is guided by the Council of Europe Convention on the Protection of Individuals regarding Automatic Processing of Personal Data of 28 January 1981, as amended, approved by the Council of Europe Committee of Ministers on 15 June 1999, Regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
- 3.2. The Operator collects and stores the User's information for the following purposes:

- 3.2.1. providing feedback to the User, including sending notifications, requests and information related to the Website, rendering services, informing about new offers, including via email, as well as request management from the User;
- 3.2.2. rendering services and (or) software for the User;
- 3.2.3. improving the quality of services provided to the User, ease of use, carrying out statistical and other studies based on anonymous data.
- 3.3. In the processing of User's information, the Operator is guided by applicable laws. Processing of User's information is based on the following principles:
  - 3.3.1. lawful purposes and methods of processing User's information and integrity of their use;
  - 3.3.2. conformity of the scope and nature of processing User's information and methods of processing of User's information with aims stated in the Policy;
  - 3.3.3. reliability of User's information, their adequacy for the purposes of processing, as well as inadmissibility of processing of User's information redundant in relation to the purposes stated in the Policy;
  - 3.3.4. inadmissibility of combining databases and electronic documents containing User's information created for incompatible with each other purposes;
  - 3.3.5. inadmissibility of processing of User's information which are redundant in relation to the purposes of processing specified in the Policy or incompatible with such purposes.
- 3.4. The content and scope of the personal data of Users are determined in accordance with the purposes of processing personal data. The operator does not process personal data that are excessive in relation to the above processing purposes, or are incompatible with such purposes.

#### **4. RIGHTS AND OBLIGATIONS OF THE OPERATOR AT THE PROCESSING OF USER'S INFORMATION**

##### **4.1. The Operator has not the right:**

- 4.1.1. use User's information for purposes not covered by the Policy;
- 4.1.2. disclose information containing User's information to a third party without the consent of the User, with the exception of cases stipulated by applicable laws.
- 4.2. The Operator undertakes ensure the confidentiality of User's information in accordance with the internal policies and rules established by the Operator. The Operator takes necessary and sufficient organizational and technical measures to protect User's information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties with them.
- 4.3. The User's data must be destroyed after 3 (three) years from the date of their arrival in the Automated System of the Operator.
- 4.4. The Operator does not provide or disclose the information containing the User's personal data to a third party without the consent of the subject of personal data, except when it's necessary to prevent a threat to life and health, as well as in the cases established by applicable laws.

#### **5. CHANGE OF PRIVACY POLICY**

- 5.1. The Operator has the right to make changes to the Policy. When changes are made, the date of the last update shall be indicated in the latest version. The new version of the Policy comes into force from the date of its renewal and placement on the company's website, unless otherwise provided by the new version of the Policy.

Privacy policy.

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- 5.2. Continued use of the Website by the User after any amendments to the Policy means the User's consent to such amendments and / or additions. The User agrees to regularly view the content of the Policy to ensure awareness with its amendments.