

# PRIVACY POLICY

Last updated: 01.01.2020

## I. General Provisions:

1) This Privacy Policy ("Privacy Policy") regulates the collection, storage, use and disclosure of the Personal Data and other information of Users in the process of using the site <https://lets.trade/> ("Site").

2) Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in the Terms of Use.

3) The User must carefully read the terms of this Privacy Policy before using the Site. Using the Site, the User confirms that he agrees to the Privacy Policy, and also accepts the Terms of Use.

4) In case of disagreement of the User with the terms of this Privacy Policy, the Site does not bear any legal responsibility for the results of further use of the Site by the User.

5) The Site is intended solely for use by persons who are over 18 years of age. Use of the Site by minors is prohibited, and the Site is not responsible for any consequences caused by the use of the Site by minors.

6) By submitting its Personal Data to the Site, the User also gives its consent to the collection, storage, use and disclosure of its Personal Data in accordance with this Privacy Policy.

7) By using the Site, the User agrees that the Site is not responsible for any indirect, incidental, special, direct or punitive damages, including, but not limited to, lost profits, data, reputation or other material and non-material damages that may arise as a result of the use of the Site by the User or the information posted on it.

## II. Definition:

1) "Personal Data" means the data about an individual that allows identifying a person.

2) "User" or "Personal Data Subject" means any individual who uses the Site and is the subject of Personal Data collection.

3) "Usage data" is the data that is collected automatically either through the use of the Site or from the infrastructure itself (e.g. duration of the visit).

4) "Data Controller" means the person who determines the purposes and methods of collecting and/or processing information/Personal Data. For the purpose of this Privacy Policy, the Site is a Data Controller of the Personal Data of the Users.

## III. Legal grounds for processing of the Personal Data:

1) Consent to the processing of Personal Data received from the User;

2) Processing is necessary for execution of an agreement with the User stated in the Terms of Use;

3) Processing is necessary for compliance with the legal obligations that the Data Controller is subject to;

4) Processing is aimed at protecting the legitimate interests of the Site and does not violate the rights of Users.

## IV. Types of information collected by the Site:

1) While using the Site, the User may provide the following information:

A. Usage Data/ Cookies;

B. Personal Data collected by the Site for provision of certain services.

2) User registration is required to use the Site. To use certain services of the Site, the User must create a profile, register and provide the Site with his or her email address, username, password and other specified information. The User can later add additional personal information to their profile.

#### A. Usage Data/ Cookies:

1) Usage data may be automatically collected at each visit to the Site, namely the following information:

- Information that the User's browser sends each time the User uses the Site;
- Information about the use of the Site, including browser type and version used by the User;
- The pages that the User visits, the time and date of the User's visit, the time spent on those pages, the last access time of the Site;
- Information about the device use by the User including the hardware model, operating system and version, and unique device identifiers and other, but this information is anonymous and not tied to any particular person.

2) Cookies. The Site uses Cookies and similar tracking technologies to track the activity on the Site and to hold certain information.

3) The User can easily remove any Cookies that have been created in the Cookie folder on their browser setting.

4) The User may reject all Cookies from their browser or send them at their own discretion.

#### B. Personal Data collected by the Site for provision of certain services:

1) In order to provide certain types of services in accordance with the Terms of Use, the Site may collect the following User Personal Data:

- name, surname, patronymic (if any);
- sex;
- date of birth;
- address of residence registration;
- bank details;
- contact details (phone number, e-mail address);
- username and password;
- other personal data necessary for the use of the Site.

2) The Site collects the Personal Data by receiving the above information from the User and uses it in accordance with the provisions of this Privacy Policy.

3) By submitting their Personal Data, the User agrees that the Site is not responsible for any actions of any third party, including those related to the collection, processing, storage and transmission of such information.

4) The User agrees that the Site is not responsible for any indirect, incidental, special, direct or punitive damages, including, but not limited to, lost profits, data, reputation or other intangible losses that may arise as a result of the User's transfer of their Personal Data / Information to the Site.

#### **V. Purposes of collecting the Personal Data:**

1) Personal Data of Users is collected for the following purposes:

- Providing as many services and functions as possible to the Users.
- Providing information or services to the User upon request.
- Management and development of the Site activities.
- Promotion of the Site and other marketing purposes.
- Development of new products or services.
- Compliance with legal or regulatory requirements of the Site.
- Protection of rights and legitimate interests of the Site.
- Performing any actions to which the Site has received the User's consent, achieving any other purposes or reasons for which the information has been collected.

2) The Site may use the User's e-mail address to send updates, newsletters or news about its services.

#### **VI. Disclosure of the Personal Data:**

1) The Site will only disclose the Users' Personal Data in the following ways:

- with the User’s consent or at the User’s instructions;
- to third parties who perform certain works or services to provide Users with certain functions of the Site;
- certain information can be displayed in the public domain;
- in response to a request for information if such disclosure is in accordance with or required by any applicable law, regulation or legal process.

2) The Site collects, uses, processes, discloses and transfers the Users’ Personal Data only in the purposes of using the Site.

3) In the event of any transactions (such as subscriptions, etc.), the Site may transfer Users' Personal Data to its authorized service providers. These service providers may have access to Personal Data necessary to perform their functions and will process it in accordance with their privacy policies.

## **VII. Security of Personal Data:**

1) The Site protects the Users’ Personal Data through appropriate physical, technological and organizational security measures.

2) The access to Personal data is restricted and certain access rights are set.

## **VIII. Storage / Retention of Users’ Personal Data:**

1) The Site stores Users’ Personal Data in an encoded format.

2) The Site does not store Users’ Personal Data on servers.

3) The Site confirms that any third-party to whom the Personal Data are shared will provide the same or equal protection of the Personal Data as stated in this Privacy Policy and required by the law.

4) The Site stores the information of User only as long as it is necessary, in accordance with the purpose of collecting the data and required by the law. When Personal Data and other information are no longer needed the Site uses procedures either to destroy, delete, erase or convert it to an anonymous form.

5) The User may delete all their Personal Data at will. The User may withdraw their consent and/or request the deletion of their Personal Data at any time by contacting the technical support of the Site at [info@lets.trade](mailto:info@lets.trade)

6) Withdrawal of consent and/or deletion of the Personal Data prevents the User from using certain functions of the Site.

## **IX. Personal Data Subject rights:**

1) User has the right to:

- modify and correct their Personal Data at any time and the User is therefore responsible for the accuracy of their Personal Data;
- require to restrict the processing of their Personal Data and / or delete them if the obligation to store the data is not established by law;
- object to processing of their Personal Data and/or to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

2) Legal Basis for Processing Personal Data in the European Economic Area (EEA) stated in the General Data Protection Regulation (GDPR). The Site aims to take reasonable steps to allow the Users to correct, amend, delete, or limit the use of their Personal Data.

3) If the User is a resident of the European Economic Area (EEA), he has certain data protection rights stated in the General Data Protection Regulation (GDPR):

The right to access, update or to delete the information the Site has on him. Whenever made possible, the User can access, update or request the deletion of their Personal Data directly. If the User is unable to perform these actions himself, he can contact the technical support of the Site at [info@lets.trade](mailto:info@lets.trade)

The right of rectification. The User has the right to have their information rectified if that information is inaccurate or incomplete.

The right to object. The User has the right to object to processing of their Personal Data.

The right of restriction. The User has the right to request that the Site restricts the processing of their Personal Data.

The right to withdraw consent. The User also has the right to withdraw their consent to process their Personal Data at any time.

4) The User may exercise their rights by contacting the technical support of the Site at [info@lets.trade](mailto:info@lets.trade)

5) If the User wishes to receive information about their Personal Data stored on the Site and wishes to have it removed from the Site systems, he should contact the technical support of the Site at [info@lets.trade](mailto:info@lets.trade)

#### **XI. Amendments:**

1) The Site may change, amend, delete or add this Privacy Policy at any time.

2) Any such amendments will be effective upon their posting on a Site. The effective date which is at the top of the Privacy Policy informs the Users about the latest version of Privacy Policy.

3) Further use of the Site means the User's consent to such amendments and their consent to the processing of Personal Data in accordance with the latest version of the Privacy Policy.

#### **XII. Questions:**

1) Any questions relating to this Privacy Policy, the collection, use and disclosure of Personal Data or access to Personal Data required by law (or would have been the subject of such a review if the storage had taken place in the relevant EU Member State) should be addressed by the Users to [info@lets.trade](mailto:info@lets.trade)