# **Privacy Policy**

This Privacy Policy governs the manner in which Cpality collects, uses, maintains and discloses personal data collected from the Users of the Cpality Services.

Please read the following Privacy Policy carefully to understand our practices regarding your information and how Cpality will use it.

By continuing to use Cpality Services, you acknowledge that you have read, understood and accepted the information described in this Privacy Policy. If any User does not agree with this Privacy Policy in general or any part of it, such User should not access or use the Cpality Services.

#### **Data Collected**

Creating an Account in Cpality system is required for using many of the features of the Cpality Services. We require certain information about you at registration, including your login (email) and password (which you generate), your full name, skype or telegram ID. Any other information or content you provide us on the Service will be saved and associated with your account, including information that is used for funds transfers (either to us or from us).

We may record information about your usage of the Cpality Services such as which products you view and purchase, the frequency and size of data transfers and other statistics. We will also keep information regarding all order and bids you place on the Cpality Services, and all metrics and measurements regarding such order, bids, advertisements, campaigns and any other of your activities on the Cpality Services.

As well, by a user performing any actions on Cpality Website we may automatically collect the following information:

- Your platform, OS and browser versions, timezone, IP (Internet protocol) and other technical information.
- Analytical information considering your Cpality Website visits. This
  information may include: the incoming source of your visit, your behavior flow,
  bounce-rate, enter and exit pages, page response times, certain pages
  spending time, and other information.

## **Data Usage**

By the submitting your personal information and accepting the Cpality Terms of Use and Privacy Policy on our Website you consent with the legitimate grounds of processing your personal information.

We may use the information you give us to provide you with certain features and to create a personalized experience on Cpality Website. We may also use that information to operate, maintain and improve features and functionality of the Cpality Services and performing the contract we have with use.

We may be processed the transaction data, including your contact details, payment details, transaction details, for the purpose of payment and keeping proper records of those transactions.

You should read carefully and follow the applicable privacy policies of the Payment processor.

### **Protection of User's Data**

In order to help keep your data secure, we use SSL certificates for end-to-end encrypted connections among all of our servers, Services, and client applications.

We have put in place commercially reasonable physical, electronic, and organizational procedures to safeguard and secure the information we collect. For

example, password information is stored on our servers and is protected using hashing and encryption technologies.

We do not store any of your payment or credit card information on our servers. The data is encrypted and securely stored by an independent companies which provide payment-processing services for Cpality.

# **Data Protection Rights**

In respect to the General Data Protection Regulation, all Users will have the following rights regarding personal data we hold about the Users:

The right to be informed. Users have a right to be aware of our personal data protection clauses and data processing activities, whose details are contained in this Privacy Policy.

The right of data correction. You have an option to update your personal data using your profile section. In order to change any additional information please inform us and we will update our data records as soon as possible.

The right to erasure. If you no longer wish us to hold your personal data, please notify us using the support ticket system and we will remove it from our database within a month. Please note that it is not possible to provide our services without holding your personal data.

The right to restrict processing. You have a right to object that we are no longer process your personal data in certain ways, whilst not requiring us to delete the same data.

The right to transfer portability. You have a right to receive personal data copy we hold about you. As well, you may request that we transfer your personal data directly to the third party if it's technically possible.

The right to object. If you feel your fundamental rights and freedoms are being impacted you have a right to object us using your personal data, unless we have overriding legitimate grounds for such processing. As well, you have a right to object if we use your personal data for marketing purposes (including profiling) or for statistical and research purposes. Please notify us of your objection and we will cease such data processing.

The right to withdraw consent. Withdraw the consent you gave us with regard to the processing of your personal data for certain purposes, such as to allow us to promote our products and services to you.

## **External Links**

Cpality Website may contain links to external websites not owned by or officially affiliated with Cpality in any way. Cpality is not responsible for the privacy practices or content of such websites. We advise you to review the privacy policy of external sites before providing any personal information.

## **Changes to this Privacy Policy**

Cpality has the discretion to update this Privacy Policy at any time. When we do, we will post a notification on the main page of our website, revise the updated date at the bottom of this page. We encourage Users to frequently check this page for any changes to stay informed about protection all the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

### **Contacts**

If you have any questions about our privacy policy or wish to obtain more details in relation to the personal data, we process about you or wish to exercise any of your rights set out in this Privacy Policy please contact us via email at: support@cpality.com.