

USER DATA PROTECTION POLICY

The Website user is an individual who has reached the age of majority, is able to acquire civil rights for himself or herself through his actions and independently exercise them and also has an ability to create civil duties for himself or herself through his actions, independently fulfill them and bear responsibility in case of their non-fulfillment, or a legal entity registered in accordance with the procedure established by law.

The Administration is an individual entrepreneur Koreniuk Oleksandr Vasylyovych, identification code 3263705274, who is the sole owner of the platform on the basis of private property rights and provides organizational, financial, technical support in order to ensure the existence and functioning of the platform.

The Platform is an Internet resource located on the Internet at the address: <https://aisixteen.com/>. The Platform contains the source code on the Service and provides the User with access to its services.

The Parties are the Administration and Users.

The User Data Protection Policy (*abbreviated as the "Privacy Policy"*) is a set of rules for processing User data and interaction of the Parties in this process, as part of the User's use of the functions of the Site and the Platform.

Acceptance is a legal action of the active form of the Party expressing the consent of the Party to the provisions and the rules for processing User data set out in the Privacy Policy. The parties have agreed that such an action can be expressed:

- (a) By the Administration – by publishing this Privacy Policy on the Platform;
- (b) By the User – in the manner defined by the provisions of the Privacy Policy.

General Data Protection Regulation ("GDPR") is the General Regulation on Personal Data Protection 2016/679 of the European Parliament and the Council of the European Union of 27 April 2016, on the protection of individuals regarding the processing of personal data and on the free movement of such data, as well as the repeal of Directive 95/46/EC (General Data Protection Rules).

Personal data is any factual information that allows identifying the data subject. Such information includes, but is not limited to, name, location data, online identifier, one or more factors specific to physical, physiological, genetic, mental, economic, cultural or social identity, including, but not limited to, IP addresses, name, email, API tokens, payment information, HTTP response (status) code.

1. General terms and conditions

1.1. This Privacy Policy defines the procedure for processing and protection of personal data about Users by the Administration which can be obtained by the Administration when the User uses the services provided through the Platform.

1.2. When compiling this Privacy Policy, as well as in our algorithms of interaction with Users, the requirements of the Rules for the protection of personal data (General Data

Protection Regulation) shall be taken into account.

1.3. The administration provides its services exclusively to persons who have reached the age of 18, are able to acquire civil rights for themselves by their actions and independently exercise them.

1.4. The Administration combines at the same time two legal statuses provided for by the Rules for the Protection of Personal Data:

(a)Data Controller

(b)Data Processor

1.5. In relations with Users, the Administration shall have the legal status of the Data Controller.

1.6. In the relationship of the User with third parties in which the functions of the Platform are used, the Administration shall have the legal status of a Data Processor.

1.7. The purpose of this Privacy Policy is to ensure proper protection of information about Users, including their personal data, from unauthorized access and disclosure.

1.8. The relations related to the collection, storage, dissemination and protection of information provided by the User shall be governed by this Privacy Policy. The Administration pays special attention to the protection of personal data.

1.9. The Administration informs Users about how it uses the information coming to the Platform.

1.10. Users who intend to use the functionality of the Platform for the first time, including in a test format, must first familiarize themselves with the provisions of this Privacy Policy.

1.11. Users using the functionality of the Platform at the time when the Privacy Policy takes effect are required to familiarize themselves with its current provisions. At the same time, the Administration is obliged to send out the current version of the Privacy Policy to the persons mentioned in this paragraph of the Privacy Policy. In this case, the e-mail address specified by the User in the process of filling out the corresponding registration form of the Platform is used.

1.12. Users, including those mentioned in paragraphs 1.10., 1.11., who have read and agree with the provisions of this Privacy Policy, express their full agreement with the terms of this Privacy Policy and grant the Administration the right to use and process personal data about them for the purposes provided for by the functional purpose of the Platform.

1.13. In case of non-fulfilment of the obligation provided for in paragraph 1.12. of this Privacy Policy, the User shall be considered not to have accepted the terms of the Privacy Policy. In this case, the User shall be prohibited from using the functionality of the Platform, and the User himself shall be deprived of the opportunity to use the functionality of the Platform. In the event of the occurrence of the conditions provided for in this paragraph of the Privacy Policy, the Administration undertakes to delete personal data about such a person.

1.14. In case of disagreement with the provisions of this document (in part or in whole), the person who expressed such will shall have no right to use its Platform. At the same time, for such a Party, the consequences provided for by the provisions of paragraph 1.13. Privacy Policy shall take effect.

2. Principles of processing personal data of the Platform Users.

2.1. Personal data shall be legally, fairly and transparently processed by the Administration in relation to the User.

2.2. The processing of the User's personal data shall be carried out only in case and only for the purposes for which this data is collected.

2.3. The User's personal data must correspond to, relate to and be limited to the purpose of using the Platform for which such data is processed.

2.4. The User's personal data used by the Administration is accurate and up-to-date. Outdated and inaccurate data shall be corrected or deleted by the Administration.

2.5. The Administration shall conduct regular checks in order to clean the database in an orderly manner. The Administration shall store User information for a certain period of time if this is due to justified commercial or legal purposes.

2.6. Personal data shall be processed by the Administration in such a way as to ensure proper protection of personal data, including protection against unauthorized or illegal processing, as well as against accidental loss, destruction or damage using appropriate technical or organizational measures.

3. The procedure for using the information provided by the Users of the Platform

3.1. For the purpose of providing the User with services through the Platform, the Administration shall collect two types of information: personal and non-personal information.

3.1.1. Personal information shall include information that allows you to find out who the User is, and which can be used to identify the User, contact him or her or to determine his or her location (IP).

3.1.2. The personal information that the User provides includes: first and last name, phone number, email address and other contact information.

3.1.3. Personal information shall be collected by the Administration in the course of the following actions on the site:

- filling in personal information during registration;
- implementation of the order of services performed through the activities of the Platform;

3.1.4. The Administration uses Users' personal information to provide services, send advertisements and offers as well as to improve the User experience of the Platform.

3.1.5. Non-personal information contains information that does not identify a particular

individual.

4. Purposes of collecting, processing and storing information provided by the Users of the Platform

4.1. Processing of personal data about the User is carried out by the Administration only if the User has consented to the processing of his personal data for one or more specific purposes.

4.2. Processing of personal data about the User shall be carried out by the Administration for the following purposes:

- to identify the User within the framework of the relationship between the Administration and the User;
- to allow the Administration to provide the Users with a number of services offered by the Platform;
- to conduct statistical and other research based on depersonalized data.

4.3. In the case when the Administration acts as a Data Processor, data about third parties with whom the User interacts in the framework of their activities shall be collected by the Administration solely for the purpose of storage.

5. Rights of Users who provide their Personal Data for processing

5.1. The User has the right to:

5.1.1. Get information from the Administration upon request about:

- (a) for the purposes of processing the User data by the Administration;
- (b) persons to whom personal data has been or will be disclosed, in particular recipients in countries outside the European Union or international organizations;
- (c) the estimated period during which personal data will be stored, or, if this is not possible, the criteria used to determine this period;

5.1.2. To receive from the Administration, upon request, the information defining the categories of personal data;

5.1.3. To demand the controller to correct or delete personal data or restrict the processing of personal data in relation to the data subject or express objections to such processing;

5.1.4. To file a complaint with the appropriate supervisory authority that controls the processing of personal data;

5.1.5. regarding the presence of automated decision-making, including profiling referred to in Articles 22 (1) and (4) of the GDPR and, at least in these cases, meaningful information about the logic involved as well as the significance and intended consequences of such processing for the data subject;

5.1.6. to receive from the controller without undue delay the correction of inaccurate personal data concerning the User;

5.1.7. to indicate incomplete personal data, including by submitting an additional application;

5.1.8. to obtain from the controller the deletion of personal data concerning the User without undue delay if there is at least one of the following grounds:

- personal data is no longer required in relation to the purposes for which they were collected or otherwise processed;
- The User does not agree with the provisions of the Privacy Policy;
- there are no fundamental legal grounds for processing;
- personal data has been illegally collected and/or processed;

5.2. If the Administration has allowed a situation in which User data has become publicly available, the Administration is obliged to delete such User data, and also, taking into account the available capabilities and cost of implementation, it must take reasonable steps, including technical measures, to inform the persons who process the personal data that the User wished to delete about the removal of any links on this data or to prevent their copying or replication.

6. Terms for processing personal information provided by the User and its transfer to third parties

6.1. The Administration shall take all necessary measures to protect the User's personal data from unauthorized access, modification, disclosure or destruction.

6.2. The Administration provides access to personal data about the User only to the circle of persons who need this information to ensure the functioning of the Platform and to provide services to the User.

6.3. In order to provide services to the User, the Administration shall have the right to provide the User's personal information to third parties to provide the ordered services. In this case, the information shall be transmitted confidentially and in accordance with all obligations in order to ensure the security of personal information.

6.4. The Administration has the right to use the information provided by the User, including personal data, in order to ensure compliance with the requirements of the current legislation of Ukraine, as well as the legislation of the place of residence of the User / Users (including for the prevention and / or suppression of illegal and / or illegal actions of the Users). Disclosure of the information provided by the User can be made only in accordance with the current legislation of Ukraine, as well as the legislation of the place of residence of the User / Users at the request of the court, the request of law enforcement agencies as well as in other cases provided for by the legislation of the relevant jurisdiction.

6.5. The Administration applies the necessary measures, from a commercial point of view, for the purpose of preventing the collection, modification or destruction by third parties of the information made available to the Administration on the Platform.

6.6. The measures specified in clause 6.5. include monitoring the network flow to identify unauthorized attempts to download or modify information, as well as, under certain circumstances, encoding confidential information using Secure Connection Protocol (SSL) or other similar technologies. The Platform also provides controls to prevent any illegal activity, or activity that may expose the Administration to legal liability or cause damage to it.

6.7. The Administration undertakes to ensure the security of the Platform and the Website as well as the constant observance of its legality so that the services provided through the Platform remain accessible to all Users.

6.8. Despite the fact that the Administration takes all necessary, from a commercial point of view, measures in order to prevent unauthorized third parties from collecting Users' personal information transmitted to the Administration through the Platform, illegal interception or seizure of information by third parties is still possible.

6.9. In case of leakage / hacking / compromise of personal data, the Administration undertakes to bring this fact to the attention of the relevant authorities, no later than 72 hours after the Administration became aware of such leakage / hacking / compromise.

7. Terms of Use of the Platform

7.1. The User, when using the Platform, confirms that:

7.1.1. he or she has all the necessary rights that allow him or her to acquire civil rights for himself or herself and independently exercise them, as well as the ability to create civil duties for himself or herself by his or her actions, independently fulfil them and bear responsibility in case of non-fulfilment;

7.1.2. he or she indicates reliable information about himself or herself in the amounts necessary to use the services of the Platform. Mandatory fields for further provision of Platform services are marked in a special way, i.e. with the symbol "*", all other information shall be provided by the User at his or her own discretion.

7.1.3. he or she is familiar with the terms of this Privacy Policy, expresses his or her agreement with it and assumes the rights and obligations specified in it. Familiarization with the terms of this Privacy Policy and putting a tick under the link to this Policy constitutes written consent of the User to the collection, storage, processing and transfer to third parties of the personal data provided by the User.

7.1.4. The Administration does not verify the accuracy of the information received (collected) about the Users, except in cases when such verification is necessary in order to fulfil obligations to the User as well as in other cases not provided for by the provisions of the Privacy Policy, but established by the norms of the current legislation of Ukraine, as well as the legislation of the place of residence of the User / Users.

7.1.5. using the functionality of the Platform, he or she agrees to receive periodic e-mail messages about updates to the services provided through the Platform.

7.2. The User has the right to receive personal data about him or her that the User has provided to the Administration, and also has the right to transfer this data to other persons, without interference from the Administration to which such personal data has been provided.

7.3. The User has the right to object to certain types of processing of his personal data - direct marketing, processing in order to protect legitimate interests or perform any task in the public interest / exercise of authority, as well as data processing for research or statistical purposes.

7.4. The Administration shall have the right to provide links to websites and materials of third parties. These links to third-party websites and materials are provided solely for the purpose of providing information.

8. Within the framework of this Privacy Policy, "personal information about the User" means:

8.1. The data provided by the User independently during the use of the Platform, including, but not limited to: first name, last name, contact phone number, email address and others.

8.2. Data automatically transmitted to the Platform during its use using the software installed on the User's device, including IP address, cookie information, information about the User's browser (or other program that accesses the Platform), access time, the address of the requested page.

8.3. The Administration uses non-personal information through the use of cookies or through the collection of the flow of information exchange carried out in order to optimize the use of the Platform, the date and time of visiting this website, etc. Examples of information exchange flow include:

- the name of the domain or URL address from which the user accesses the Internet;
- Internet Protocol (IP) address;
- type of web browser used;
- date and time of the visit to this website, etc.

8.4. Other information about the User, the collection and/or provision of which is determined by the terms of use of the Platform.

9. Modification and deletion of personal data

9.1. The User may at any time change (update, supplement) the personal information provided by him or her or any part of it, as well as the parameters of its confidentiality, by sending this information to the Administration's e-mail.

9.2. The User may at any time delete the personal information provided by him or her or part of it, in order to avoid its dissemination or transfer to third parties.

9.3. The Administration shall have the right to delete personal data about the User if they are no longer needed for the purposes for which they were collected as well as in the absence of other grounds for their storage.

10. Introducing amendments to the Privacy Policy.

10.1. The Administration shall have the right to introduce amendments to this Privacy Policy. When making changes to the current version, the date of the last update is indicated. The new version of the Privacy Policy comes into force from the moment of its publication on the Platform, unless otherwise provided by the new version of the Privacy Policy. The current

version of the Privacy Policy is available on the page at: <https://aisixteen.com/>

10.2. This Privacy Policy and the relations between the User and the Administration arising in connection with the application of the Privacy Policy are subject to the application of the law of Ukraine as well as the legislation of the place of residence of the User / Users.

11. Contact details

11.1. All suggestions or questions regarding this Privacy Policy should be reported to the Administration at the appropriate email address: admin@aisixteen.com