

## PRIVACY POLICY

9/01/2023 edition

### 1. General terms

This personal data processing policy defines the procedure for processing personal data and measures to ensure the security of personal data by Sole proprietor Manukyan Sirvard Armenakovna (Armenia) and Sole proprietor Evera Pelle Dmitry Cheglik (Poland) (hereinafter referred to as the Operators).

1. Operators set as their most important goal and condition for carrying out their activities the observance of the rights and freedoms of humans and citizens when processing their personal data, including the protection of the rights to privacy, personal and family secrets.
2. This policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that Operators can receive about visitors of the websites <https://upp.app> and <https://app.upp.app>.

### 2. Basic concepts used in the Policy

1. Automated processing of personal data – processing of personal data using computer technology;
2. Blocking of personal data – temporary cessation of processing of personal data (except for cases where processing is necessary to clarify personal data);
3. Website – a collection of graphic and information materials, as well as computer programs and databases that ensure their availability on the Internet at the network addresses <https://upp.app> and <https://app.upp.app>;
4. Information system of personal data - a set of personal data contained in databases, and information technologies and technical means that ensure their processing;
5. Depersonalization of personal data - actions as a result of which it is impossible to determine without the use of additional information the ownership of personal data to a specific User or other subject of personal data;
6. Processing of personal data - any action (operation) or set of actions (operations) performed using automation tools or without the use of such means with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;
7. Operator - a state body, municipal body, legal or natural person, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) transactions performed with personal data;
8. Personal data – any information relating directly or indirectly to a specific or identified User of the website <https://upp.app> or <https://app.upp.app>;
9. User – any visitor of the website <https://upp.app> or <https://app.upp.app>;
10. Providing personal data – actions aimed at disclosing personal data to a certain person or a certain circle of persons;
11. Dissemination of personal data - any actions aimed at disclosing personal data to an indefinite number of persons (transfer of personal data) or familiarization with personal data to an unlimited number of persons, including the publication of personal data in the media, posting in information and telecommunication networks or providing access to personal data in any other way;

12. Cross-border transfer of personal data – transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity;
13. Destruction of personal data – any actions as a result of which personal data are destroyed irrevocably with the impossibility of further restoration of the content of personal data in the personal data information system and (or) as a result of which material media of personal data are destroyed.

### **3. Operators may process the following personal data of the User**

1. Last name, first name, patronymic;
2. Email address;
3. Phone numbers;
4. The site also collects and processes anonymized data about visitors (including cookies) using Internet statistics services (Google Analytics and others).
5. The above data below in the text of the Policy are united by the general concept of Personal Data.

### **4. Purposes of processing personal data**

1. The purpose of processing the User's personal data is to inform the User by sending emails; conclusion, execution and termination of civil contracts; providing the User with access to services, information and/or materials contained on the website.
2. Operators also have the right to send notifications to the User about new products and services, special offers and various events. The User can always refuse to receive information messages by sending the Operator an email to support@upp.app with the text "Opt-out of notifications about new products and services and special offers."
3. Anonymized data of Users, collected using Internet statistics services, is used to collect information about the actions of Users on the site, improve the quality of the site and its content.

### **5. Legal grounds for processing personal data**

1. Operators process the User's personal data only if it is filled out and/or sent by the User independently through special forms located on the website <https://upp.app> or <https://app.upp.app>. By filling out the appropriate forms and/or sending his personal data to the Operators, the User expresses his consent to this Policy.
2. Operators process anonymized data about the User if this is allowed in the User's browser settings (saving cookies and using JavaScript technology are enabled).

### **6. The procedure for collecting, storing, transferring and other types of processing of personal data**

The security of personal data processed by Operators is ensured by implementing legal, organizational and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.

1. Operators ensure the safety of personal data and take all possible measures to prevent access to personal data by unauthorized persons.
2. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of current legislation.
3. If inaccuracies in personal data are identified, the User can update them independently by sending a notification to the Operators to the Operator's email address support@upp.app marked "Updating personal data."
4. The period for processing personal data is unlimited. The User may at any time withdraw his consent to the processing of personal data by sending a notification to the Operators via email

to the Operators' email address support@upp.app marked "Withdrawal of consent to the processing of personal data."

## **7. Cross-border transfer of personal data**

1. Before starting the cross-border transfer of personal data, operators are required to ensure that the foreign state to whose territory it is intended to transfer personal data provides reliable protection of the rights of personal data subjects.
2. Cross-border transfer of personal data to the territory of foreign states that do not meet the above requirements can only be carried out if there is written consent of the subject of personal data to the cross-border transfer of his personal data and/or execution of an agreement to which the subject of personal data is a party.

## **8. Final provisions**

1. The user can receive any clarification on issues of interest regarding the processing of his personal data by contacting the Operators via email support@upp.app.
2. This document will reflect any changes to the Operators' personal data processing policy. The policy is valid indefinitely until it is replaced by a new version.
3. The current version of the Policy is freely available on the Internet at <https://app.upp.app/privacy.pdf>.

## **DETAILS OF OPERATORS**

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