

## **PRIVACY POLICY**

Smpl Global Limited - 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) performed with personal data.

Website – <https://simpletap.app>

Policy – this Privacy Statement and the Rules for the processing of personal data.

Personal data is information recorded on a tangible medium about a specific person, identified with a specific person or which can be identified with a specific person, allowing the identification of that person directly or indirectly by reference to one or more factors specific to his biological, economic, cultural, civic or social identity.

Personal data subject is the individual to whom the relevant personal data relates.

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.

## **GENERAL PROVISIONS**

This Policy defines the principles, purposes and conditions for the processing of Personal Data, measures to protect Personal Data, as well as the responsibilities of the Company during their processing.

The use of personal data by the Subject of the Company Website means his/her familiarization with and acceptance of the Policy.

This Policy has been developed in accordance with the current legislation on personal data and regulatory and methodological documents of executive bodies of state power on issues of security of Personal data, including during their processing.

This Policy applies to all processes of collection, recording, systematization, accumulation, storage, clarification, extraction, use, transfer (distribution, provision, access), blocking, deletion, destruction of personal data, carried out using automation tools and without the use of such funds.

This Policy applies to relationships in the field of personal data processing that arose with the Company both before and after the approval of this Policy.

The purpose of this Policy is to establish the basic principles, conditions and approaches to processing and ensuring the security of personal data when processed by the Company, as well as compliance with the requirements of the law on personal data and other regulations adopted in accordance with it.

## **PURPOSES OF PROCESSING PERSONAL DATA**

The company processes personal data for the following purposes:  
carrying out activities provided for by the Company's Charter, including information support for the Company's activities.

## **PURPOSES OF PROCESSING PERSONAL DATA**

Individuals: e-mail address, telegram ID.

## **PROTECTION AND TRANSFER OF PERSONAL DATA**

The company takes all necessary legal, organizational and technical measures to protect Personal data from unauthorized or accidental access, modification, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data:

Prevents unauthorized persons from accessing equipment used for processing Personal Data;

Prevents unauthorized reading, copying, modification or removal of data media;

Prevents unauthorized recording of Personal Data and modification or destruction of recorded Personal Data and provides the possibility of establishing retroactively: when, by whom and what Personal Data were changed;

Ensures the security of data processing systems intended for the transfer of Personal Data, regardless of the means of data transmission;

Ensures control of employee access to received Personal Data;

Excludes unauthorized reading, copying, modification and destruction of Personal Data during the transfer and transportation of Personal Data;

Ensures the confidentiality of information obtained during the processing of Personal Data;

Ensures compliance with the protection of personal data during their processing in personal data information systems, the implementation of which ensures established levels of personal data security;

By using the Site and entering into legal relations with the Company, the Personal Data Subject gives his consent to the transfer of his Personal Data to third parties when this is necessary for the Company to properly fulfill its obligations in accordance with applicable law or fulfill obligations to the Personal Data Subject. The Company guarantees that when transferring personal data, it provides a similar level of security for the storage of Personal Data by these third parties.

## **RIGHTS OF THE SUBJECT OF PERSONAL DATA**

GDPR entitles you to a range of specific rights with regard to your Personal data. Please make sure you examine the following list with due care. In addition, we would like to stress that some rights relate to specific circumstances only.

Right to be informed regarding your Personal data. By this Privacy Policy, Simple tries to highlight the most crucial issues concerning the security of your Personal Data to keep you informed. If the Privacy Policy is in any way changed, then this page will be updated accordingly.

Right to access. It is your right to receive information from us regarding whether we are using your Personal data. You are also entitled to ask us to clarify which of your Personal data we have. In addition, you may request a copy of the Personal data which is being processed.

Right to alter incorrect data. You have a right to change inaccurate Personal data in our possession.

Right to have the data removed. You are entitled to erase your Personal data in our possession due to specific circumstances. Those would be if the data is no longer necessary for the stated purposes, you withdraw your Consent to data processing, your Personal data has been unlawfully used, there are no overriding legitimate grounds to process your information and/or your Personal data is to be erased for legal reasons. However, please, note that Simple is not bound to comply with such a request if processing of your Personal data is necessary to exercise the right of freedom of expression and information, comply with a legal obligation in the public interest, exercise official authority and/or establish, exercise or defend legal claims.

Right to restriction of processing. You have the right to request the suspension of your Personal data being processed, for example, if the accuracy of the data is being questioned.

Right to data transfers. You are entitled to transfer your Personal data in our possession to any other Data Controller. You also have a right to receive a report on your Personal data from Simple in a structured, commonly used and machine-readable format. While transferring the above-mentioned data to you, Simple will take all security measures necessary to ensure your Personal data is securely transmitted by using end-to-end encryption or any other strong authentication measures.

Right to object. You have the right to object to the processing of your Personal data. However, where legitimate grounds to use your information outweigh your interests and rights, Simple reserves the right to continue such processing.

Right not to be subject to automated decision-making. You are entitled not to be subjected to automated decision procedures. Simple ensures that all important matters relating to your Personal Data are either resolved by our team or by any engaged third party.

## **STORAGE TERMS OF PERSONAL DATA**

The Company stores Personal Data for five years from the date of receipt from the Personal Data Subject, unless other periods are provided for by law or the nature of the relationship between the Company and the Personal Data Subject. The Company has the right to carry out indefinite storage (archiving) of Personal Data, if this does not contradict current legislation.

## **MARKETING**

The Company has the right to use the Personal Data of the Personal Data Subject to send news, promotions and other information related to the products and services provided by the Company. The Company has the right to transfer Personal Data to third parties so that they can assist with marketing and advertising projects or send marketing mailings. By using the Site, the Personal Data Subject accepts this Policy and agrees to receive such communications.

The subject of personal data has the right to refuse to receive such information by contacting the Company with a corresponding application.

## **USE OF COOKIES**

The Company uses industry practice to place a small amount of data that will be stored in the browser of a person visiting the Site (cookies). Cookies may be stored on the computer or other devices used to visit the Site. This information is used to identify visitors and optimize the Company's services and improve the quality of work. The Company may use the information collected to ensure compliance with regulatory requirements and to detect irregular or suspicious activity on the part of the Company's customers.

## **FINAL PROVISIONS**

The Company has the right to change this Policy at any time by publishing the changed text on the Site. Tracking changes to the Policy is carried out by the Personal Data Subject independently. All questions regarding the application of this Policy can be directed to the email address : [support@simpletap.app](mailto:support@simpletap.app)

**Last update of this Privacy Policy: May 8, 2024**