

Privacy Policy

A. INTRODUCTION

PLEASE READ THIS DOCUMENT CAREFULLY. IT CONTAINS IMPORTANT INFORMATION THAT YOU SHOULD KNOW BEFORE CONTINUING TO USE OUR SERVICES, WEBSITES OR SOFTWARE. BY PROVIDING CONSENT TO THIS PRIVACY POLICY AS WELL AS CONTINUING TO USE SERVICES, WEBSITES AND SOFTWARE YOU WILL BE DEEMED TO HAVE ACCEPTED THIS PRIVACY POLICY.

Inspiritum Ltd and/or its affiliates (hereinafter - the «Company») are committed to protecting your privacy. This Privacy Policy applies to processing information from our websites, including but not limited **inspidsp-exchange.com** (Website), our services, including our associated mobile applications owned and controlled by the Company (the «Service»), and other sources. This Privacy Policy governs our data collection, processing and usage practices. It also describes your choices regarding use, access and correction of your personal information. By using Website, Service or providing us data in any other way, you consent to the data practices described in this Privacy Policy. If you do not agree with the data practices described in this Privacy Policy, you should not use Website or Service or provide us data in any manner.

Your use of the Website and Service of the Company, including any dispute concerning privacy, is subject to this privacy statement («**Privacy Policy**»). By using the Service and Website, you are accepting the practices set out in this Privacy Policy and other agreements with the Company related to data processing.

We reserve the right to modify this Privacy Policy at any time by posting the changes on this page. Please check the revision date below to determine if the policy has been modified since you last reviewed it. Your continued use of any portion of the Service following posting of the updated Privacy Policy will constitute your acceptance of the changes. If we make any revisions that will change the way of collecting or using your personal data, these changes will be published in present Privacy Policy and the effective date will be stated at the beginning of the Policy. Therefore, you should check it periodically so that you are aware of our latest policies and practices. If the Company substantially changed its practices regarding the collection or use of your personal data, you will be notified of such changes with an opportunity to opt out.

«Personal data» is defined in Article 4(1) of the GDPR as: «any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person».

This Privacy Policy was last updated on **July 12, 2019**. the Company has created this Privacy Policy in order to disclose its information gathering and dissemination practices for Services. Upon reading this Privacy Policy, you will be informed regarding the following:

- (1) what personally identifiable information of yours or third party personally identifiable information is collected from you through the Service;
- (2) the organization collecting the information;
- (3) how the information is used;
- (4) with whom the information may be shared;
- (5) what choices are available to you regarding collection, use and distribution of the information;
- (6) the kind of security procedures that are in place to protect the loss, misuse or alteration of information under Company's control; and
- (7) how you can access and correct any inaccuracies in the information collected about you.

Questions regarding this Privacy Policy should be directed to the Company by emailing at you have any concerns or feel that there are certain problems or issues relating to compliance with the policies outlined in this Privacy Policy, please submit a report by email.

The Company has a strong commitment to providing superior service to all of our customers and visitors and users of this Service and particularly respecting your concerns about privacy. We understand that you may have questions about how this Service collects and uses information and we have prepared this statement to inform you of the privacy principles that govern the Service.

This Privacy Policy contains numerous general and technical details about the steps we take to respect your privacy concerns. We have organized this Privacy Policy by major processes and areas so that you can quickly link to the information of most interest to you. The bottom line is that meeting your needs and expectations form the foundation of everything we do - including protecting your privacy.

When providing the data to us you may be asked to specify certain privacy preferences which affect how the Company will process your personal data. By selecting the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information.

The Company will ask you to consent to the Company's use of cookies in accordance with the terms of this policy when you first visit Website. By continuing to use Website and agreeing to this policy, you consent to the Company's use of cookies in accordance with the terms of this Policy.

Changes in Privacy Policy

Company wants you to be always aware of what personal information we collect, how we use it and under what circumstances we disclose it. All personal information, as further described below, that we collect and maintain will be subject to the version of the Privacy Policy in effect at the time of such collection. COMPANY reserves the right to change the Privacy Policy from time to time at its sole discretion and will prominently post any material changes on the home page of the Service. You will be given the opportunity to opt-out. If as the result of such changes, you want to alter the ways in which COMPANY is allowed to use your personal information, you can do so by following the procedure described in the Updating Your Personal Preferences section of this Privacy Policy (below). You will be deemed to have been made aware of, and will be subject to, the changes to the Privacy Policy by your continued use of the Service after such change has been posted for thirty (30) days.

Third Party Services

Company does not control the information collection and distribution policies on Internet domains other than those Internet domains that are under the control of Company itself. When you are on the Service or Website, you may be directed to other sites that are beyond our control. Company is not responsible for any use of the information including click-stream data created when using such third party sites.

The Service or Website may also contain advertising and other links to other web sites. Please be aware that we are not responsible for the privacy practices or content of those other sites. Also we do not send random marketing emails to personal email addresses. The Service or Website may contain hyper links to external web sites owned and operated by third parties. Company has no control over or association with such third party sites and Company is not responsible for the accuracy, completeness and quality of the information contained within them. Any and all contents on these external web sites do not reflect products, services or information provided by Company. You should direct any concerns regarding any external link to the site administrator of such site.

We also use third-party advertising companies to serve ads when you visit our Service or Website. These companies may use general information about your visits to this and/or other services in order to provide advertisements about goods and services of interest to you. If you would like more information about this practice and to know your choices about not having this information used by these companies, direct such concerns regarding to the respective company's administrator.

We demand from all our partners providing targeting data to implement an opt-out for any users that do not want to be tracked or targeted with advertisers.

Your information may be collected by Advertising IDs for mobile targeting. You may reset your

Advertising IDs any time with the following instructions:

iOS - <https://support.apple.com/en-us/HT202074>

Android - <https://support.google.com/ads/answer/2662922?hl=en>

Third Party Content

When you are on the Service, certain content may be served by a third party. These third parties may also drop their own cookies and/or use web beacons, which may be used to identify some of your preferences or to recognize you if you have previously had contact with them. We do not control the use of such technology by third parties, the information they collect, or how they use such information.

Legal Issues

The Service or Website may be subject to the laws of various jurisdictions. The Company will disclose personally identifiable information without your permission when required by law, or in good faith belief that such action is necessary to investigate or protect against harmful activities to the Company guests, visitors, associates, or property (including Service and Website), or to others. As mentioned above, laws related to personal identifiable information vary by country.

The Company may be required by law enforcement or judicial authorities to provide personally identifiable information to appropriate governmental authorities. If requested by law enforcement or judicial authorities, we will provide this

information upon receipt of the appropriate documentation. The Company may also provide information to law enforcement to protect its property and the health and safety of individuals as permitted by statute.

B. COLLECTED INFORMATION Browsing

The Service does not collect personally identifiable information from your computer when you browse the Service and request pages from our servers. This means that, unless you voluntarily and knowingly provide us with personally identifiable information, we will not know your name, your e-mail address, or any other personally identifiable information. We collect such information in order to make our Service function correctly and provide you the functionality that you see on this Service, as our servers use this information to deliver to you the pages on this Service. We also use this information to better understand how visitors use our Service and how we can better tune our Service, its contents and functionality to meet your needs.

Information We Collect

As a visitor to this Service, you can engage in many activities without providing any personal information as described above in the Browsing section of this Privacy Policy (above). In connection with subscribing to the services available on the Service or other activities, such as utilizing online software applications or purchasing or downloading any of the products and services available on the Services or Website, the Company may ask you to voluntarily supply us with certain information about yourself by filling out and submitting an online form. It is completely optional for you to engage in these activities and/or make any purchases. If you elect to engage in these activities or make purchases, however, the Company may ask that you provide us personal information, defined as any information that identifies or can be used to identify, contact, or locate the person to whom such information pertains, including but not limited to your first and last name, mailing address (including ZIP code), e-mail address, employer, and other personal information. This information is requested in conjunction with the purchase and registration of our Service.

In addition, as noted below, minimum information is requested if you choose to subscribe to product updates.

You never have to answer any questions, and you can decline this exchange of information at any time. However, if you should choose to withhold requested information, we may not be able to provide you with some of the services dependent upon the collection of this information. Depending upon the activity, some of the information that we ask you to provide is identified as mandatory and some as voluntary. If you do not provide the mandatory data with respect to a particular activity or purchase, you will not be able to engage in that activity or make such a purchase. Company will inform you of the mandatory and/or optional character of the requested and/or required information.

Company is the sole owner of the information it gathers on the Service. **Company will only share your information with outside parties in ways that are described in this Privacy Policy** or if we are required to do so by law or in the good-faith belief that such action is necessary in order to conform to the edicts of the law, cooperate with law enforcement agencies, or comply with a legal process served on the Service and the subsequent legislation.

When you use the Service or Website, Company or third parties authorized by Company may also collect certain technical and routing information about your computer to facilitate your use of the Service or Website and its services. When you surf the Internet, your Internet browser (such as Mozilla Firefox, Microsoft Internet Explorer, Safari or other) automatically transmits some information to Company every time you access content on one of our internet domains within the Service or Website. Examples of such information include the URL of the Web page you were just on (known as the “Refer”), the IP (or Internet Protocol; with the last byte cleared) address of the computer you are using, or the browser version you are using to access our site, width and height of your device, link of viewed website. All of this information may be collected by Company and used to help improve our offerings to you.

We use such data to facilitate and track your use of the Service or Website and its services. Company also uses such environmental variables to measure traffic patterns on the Service or Website. Without expressly informing you in each particular circumstance, we do not match such information with any of your personal information.

When you submit personal information to Company through this Service or Website or related applications (e.g. mobile application), you understand and agree that this information may be transferred across national boundaries and may be stored and processed in any of the countries in which Company, its affiliates, subsidiaries and third party partners maintain offices. You also acknowledge that in certain countries or with respect to certain activities, the collection, transferring, storage, and processing of your information may be undertaken by trusted vendors of Company. Such vendors are bound by contract not to use your personal information for their own purposes or provide it to any third parties.

Company may establish relationships with various service providers whose services may become available to you from Service or Website or from other Services that are linked to this Service. Typically, these providers would offer services that Company customers might find useful, such as those that can be used in conjunction with Company services and products. In order to use those services, you may be required to provide personal information to the providers. Unless expressly provided to the contrary, personal information that you provide while you are visiting a provider's service will

be subject to the privacy policy posted on such site, and personal information that you provide while on this Service or Website in conjunction with a provider's service will be subject to this Privacy Policy. For instance, the credit card information entered as part of the filling out the purchase form or registration process is collected by the third parties registration and/or merchant services and subject to their respective privacy policies. You should be aware that our agreements with these service providers often provide that they will share with Company personal information collected from you. In such instances, Company may use this information in a manner consistent with this Privacy Policy.

Personal Account

At your choice, you may create a personal account containing your personal information. A personal account is required for use of the services provided on the Service. You can create a new account directly on the Service or log in through your account located on the partner's web sites. In that case, the activity of our Service will be displayed on the partner's web sites. Partner's web sites already integrated into our Service will be offered while entering to our web site or applications. When you create a personal account, some information about your account activity will be provided to other users of Company. For instance, other users may be able to view which content you have accessed via the Service. You can access, review and update your personal account information online via the Service.

You have the right to access and change your personal information at any time by logging into your personal account, where you can view and make changes to your personal information.

Updating Your Personal Preferences

As a registered user you have the right to access and change your personal information at any time by logging into your personal account.

Information Relating to Children (Age Restrictions)

The Service and any products or services available on the Service are not directed to children under 18 years old. However, we recognize that children under the age of 18 may access this Service and subscribe to the newsletter or purchase products and services. The collection of this information is covered above. Parents and Legal Guardians may request from us to terminate and delete their child's account. You may do so by contacting us by email.

If some person less than 18 years old submits personal data and we find out that this personal data are of are data of a person less than 18 years old, we will delete the data as soon as possible.

Securing the Transmission and Storage of Information

Company operates secure data networks protected by industry standard firewall and password protection systems. Our security and privacy policies are periodically reviewed and enhanced as necessary, and only authorized individuals have access to the information provided by our users. Company takes steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no data transmission over the Internet can be guaranteed secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us or from our online products or services, and you use these services at your own risk.

We treat the information you provide to us as confidential information, excluding the depersonalized information; it is, accordingly, subject to our company's security procedures and corporate policies regarding protection and use of confidential information. After personally identifiable information reaches Company it is stored on a server with physical and electronic security features as customary in the industry, including utilization of login/password procedures and electronic firewalls designed to block unauthorized access from outside of Company. Because laws applicable to personal information vary by country, our offices or other business operations may put in place additional measures that vary depending on the applicable legal requirements. All Company employees are aware of our privacy and security policies. Your information is only accessible to those employees who need it in order to perform their jobs.

C. USE AND DISCLOSURE OF INFORMATION How Your Personal Information Is Used

Company collects your information in order to record and support your participation in the activities you select. **We will use your e-mail address to send a confirmation and, if necessary, might use the other information to contact you for help to process the purchase or service you have selected.** If you subscribe to a service or upload a content, for example, the information is used to register your rights, if any, to technical support or other benefits that may be made available to registered users. **Your personal information is also used to keep you informed about new products, product upgrades, patches, special offers, and other products and services of Company and selected third parties if you have so opted to receive such communications.**

Company may collect information about the use of the services offered via Service, such as the types of services used and how many users we receive daily. This information is collected in aggregate form, without identifying any user individually. Company may use this aggregate, non-identifying statistical data for statistical analysis, marketing, or similar promotional purposes.

Company recognizes and appreciates the importance of responsible use of information collected on this Service. Without your consent, Company will not communicate any information to you regarding products, services, and special offers available from Company or its affiliates, although we may find it

necessary to communicate with you regarding your use of the services on this Service. Except in the particular circumstances described in this Privacy Policy, Company will also not provide your name to other companies or organizations without your consent.

The Company processes personal data for the following purposes:

- Providing the website content and billing to the user which is required for contract performance.
- Processing of user's requests which is required for performance of legitimate rights and obligations or to enter a contract with a data subject.
- Ad targeting and analysis which requires your consent.
- Marketing communications which are required for our legitimate interests as our legitimate interest.
- Analysis of technical performance which is required for our legitimate interest.

How the Company may process your personal data:

- (i) Usage data which may include browser type and version, operating system and date and time of your visit. The source of the usage data is our analytics tracking system as updated from time to time. This usage data may be processed for the purposes of analysing the use of the Website and Service. The legal basis for this processing is the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis, namely monitoring usage of Service for illegal activities as well as improving the Website, Service and other products.
- (ii) Profile data – the Company may process personal data included in your personal profile. Your profile data may include, as a minimum, phone number, and country of residence. Profile data may be processed for the purposes of enabling and monitoring your use of the Website, Service and other products as well as ad targeting. The legal basis for this processing is the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis, namely monitoring usage of Service for illegal activities as well as improving the Website, Service and other products.
- (iii) Account data – the Company may process your account data, which will include your name and email address, as well as your registered address and photo identification details. The source of the account data is the data which you enter when signing up for an account. The account data may be processed for the purposes of operating Websites, providing the Service, ensuring the security of Website and Service, monitoring any illicit or suspicious transactions undertaken using the Service and also communicating with you. The legal basis for this processing is the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis, namely monitoring usage of Service for illegal activities as well as improving the Website, Service and other products.
- (iv) Publication data – the Company may process information that you post for publication on the Website or through Service. The publication data may be processed for the purposes of enabling such publication and administering the Website and the Service. The legal basis for this processing is the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis, namely monitoring usage of Service for illegal activities as well as improving the Website, Services and other products.
- (v) Service data – the Company may process personal data that you provide in the course of the use of Service and other products. The service data may include ATM data, transaction amounts and merchant information. The source of the service data is your use of the Service, including, without limitation, the transactions you undertake. The service data may be processed for the purposes of operating Website, providing services, ensuring the security of Website and Service, maintaining back-ups of the Company's databases and communicating with you. The legal basis for this processing is the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis, namely monitoring usage of Service for illegal activities as well as improving the Website, Service and other products.
- (vi) Transaction data – the Company may process information relating to transactions that you enter into with us and/or through the Website or other product. The transaction data may include your phone number and specific data concerning each transaction you enter into, merchant and pricing information. The transaction data may be processed for the purpose of monitoring the purchased goods and services and keeping proper records of those transactions.
The legal basis for this processing is the performance of a contract between you and the Company and/or taking steps, at your request, to enter into such a contract, as well as the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis, namely monitoring usage of Service for illegal activities as well as improving the Website, Service and other products.
- (vii) Enquiry data – the Company may process information contained in any enquiry you submit to us. The enquiry data may be processed for the purposes of offering, marketing and selling other relevant

- the Company products and/or services to you. The legal basis for this processing is the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis.
- (viii) Correspondence data – the Company may process information contained in or relating to any communication that you send to us. The correspondence data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis, proper administration of the Company's business and communications with the Company's users.
 - (ix) Notification data – the Company may process information that you provide to us for the purpose of subscribing to the Company's email notifications and/or newsletters. The notification data may be processed for the purposes of sending you relevant notifications and/or newsletters. The legal basis for this processing is the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis for the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
 - (x) Data on specifications and location of your device used for ad targeting which we receive directly or indirectly. The legal basis for such processing is your consent.
(i) to (x) being "Relevant Data")

The Company may also process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

In addition to the specific purposes for which the Company may process your personal data, the Company may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which the Company is subject, or in order to protect your vital interests or the vital interests of another natural person.

Please do not supply any other person's personal data to us, unless the Company request in writing that you do so.

Disclosure of Information to Third Parties

Company does use the services of third parties as independent contractors on behalf of Company. You may also use your third-party login accounts and passwords (e.g. Facebook, Twitter, Google or other) in order to register and login to the Service and use Company's services. These parties are contractually prohibited from using personally identifiable information for any purpose other than for the purpose Company specifies. We do provide non-personally identifiable information to certain service providers for their use on an aggregated basis for the purpose of performing their contractual obligations to us. We prohibit the sale or transfer of personal information to entities outside of the Company's affiliates for their use without your approval.

Company may disclose your personally identifiable information if we believe in good faith that we are required to do so in order to comply with applicable law, a subpoena, or other legal process. Company may also disclose personally identifiable information when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating this Privacy Policy, the terms of your agreements with the Company or to protect the safety of our users and the public or under confidentiality and licensing agreements with certain third parties which assist us in developing, operating and maintaining the Service and its content.

In the event that all or substantially all of Company's stock and/or all or substantially all assets are transferred or sold to another entity, Company may transfer personally identifiable information to the acquiring entity. If, as a result of such a business transition, your personally identifiable information will be used in a materially different manner, you will be given choice consistent with our policy regarding notification of changes.

the Company may disclose any or all of Relevant Data to:

- (a) any member of the Company's group of companies (this means the Company's subsidiaries, ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy; and
- (b) to the Company's insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- (c) subcontractors, insofar as reasonably necessary for the purposes of those subcontractors performing their obligations to the Company to allow the Company to provide the Service.
- (d) the Company's partners, including but not limited to each relevant payment processor, advertiser or ad network.

Financial transactions relating to the Service are handled by the Company's payment services providers. The Company will share transaction data with the Company's payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

International transfers of your personal data

In this section, the Company provide information about the circumstances in which your personal data may be transferred to our third party partners as data processors, who are located in any country provided that such recipient ensured the adequate level of personal data protection or received the data based on your consent.

Choices Available to You

You can always choose whether or not to disclose personally identifiable information and that choice will not prevent you from using the Service. Please note, however, if you should choose to withhold requested information, we may not be able to provide you with some of the services dependent upon the collection of this information and you will be given an opportunity to “opt-in” and make your preference choices for any items that are optional and which are not prerequisite for our rendering such services.

E-mail communication

While using the Service, you may be submitted to periodic e-mail mailouts on you e-mail address. Such e-mail may contain information on Company updates, advertising materials and other important information about Company.

You can choose at anytime to opt out of receiving emails from Company or from having your personally identifiable information shared with selected companies. If you want to opt out, you can do so by editing your preferences with respect to email or the sharing of information. If you elect to “opt out” we will not, as applicable, share your personal information with third parties or send you emails. However, we may continue to use your personal information for internal purposes, to enhance your user experience or as necessary to administer the site or comply with applicable law, or for the purpose of delivery of important non-advertising information.

Company mailouts may be performed on daily, weekly or monthly basis, or without any periodic schedule.

We reserve the right to send a one-time registration confirmation email, and infrequent Service Alert messages to users to inform them of specific changes that may impact their ability to use a service they have previously signed up for, regardless of email contact opt-in status. We also reserve the right to contact you if compelled to do so as part of a legal proceeding or if there has been a violation of any applicable licensing, warranty and purchase agreements.

Company is retaining these rights because in limited cases we feel that we may need the right to contact you as a matter of law or regarding matters that will be important to you. These rights do not allow us to contact you to market a new or existing service if you have asked us not to do so, and issuance of these types of communications is rare.

If you do not wish to receive e-mails with updates and information, please contact us via email. Besides that you may opt-out in every e-mail message by following the steps, specified in such message. In common, unsubscribe link is placed at the bottom of the letter. You may also opt-out online by updating your personal account as described in the Updating Your Personal References section of this Privacy Policy (above).

If you wish to opt out of receiving emails, the sharing or retention of any personal identification information, or otherwise change your personal preferences, you may contact Company by specified email.

To ensure that your request is honored, you must provide Company with information sufficient for us to accurately identify and access your records. The information we require is your full name and the email address you provided to Company. Company reserves the right to contact you to verify that we have accurately identified your record.

Cookies and personalization

Our Service uses “cookie” technology. “Cookies” are short pieces of data generated by a web server that a Service stores on a user’s computer. Certain pages on our Service may require the use of a cookie for purposes of keeping information you enter on multiple pages together. Cookies also enable us to customize our Service and offerings to your needs and provide you with a better online experience with us. In addition, cookies are used to:

- measure usage of various pages on our Service and Website to help us make our information; more pertinent to your needs and easy for you to access (cookies used for this purpose are: nsp_user_id);
- identify and categorized the internet webpages from which the visitor came to the Service and Website and observe the browsing patterns (cookies used for this purpose are: nsp_user_id);
- provide functionality such as online orders, the Company’s services and other functionality that we believe would be of interest and value to you (cookies used for this purpose are: nsp_user_id);
- tracking devices within Website (cookies used for this purpose are: nsp_user_id);
- saving unique identifier of the device that used to navigate through Website (cookies used for this purpose are: nsp_user_id);
- store session identifier (cookies used for this purpose are: nsp_user_id);

- store user last activity time (cookies used for this purpose are: nsp_user_id).

The types of cookies that we use are referred to as “session” cookies and “persistent” cookies. Session cookies are temporary and are automatically deleted once you leave the Service. Persistent cookies remain on your computer hard drive until you delete them. We do not use cookies to gather information concerning your visits to other Services, nor ascertain any personally identifiable information about you apart from what you voluntarily provide us in your dealings with Company. Cookies do not, under ordinary circumstances, corrupt or damage your computer, programs, or computer files.

In addition, the service providers we use to serve and host our advertisements, and/or deliver our e-mails, use session and persistent cookies, to track the number of times the Service is accessed and whether the site was accessed from an advertisement. A cookie is placed on your computer only if and when you click on an advertisement or open the e-mail. The cookie generated from the advertisement or e-mail does not contain any personally identifiable information and will remain on your hard drive until you delete it.

You may set your browser to block cookies (consult the instructions for your particular browser on how to do this), although doing so may adversely affect your ability to perform certain transactions, use certain functionality and access certain content on our Service.

The cookies remember information about your activities on the website and allow the Company to use this information to remember choices you’ve made on the website. This enables you to avoid submission of your login and password on each browsing session and to save the preferences you’ve made on the website. The website will ask you if you’d like to use cookies or you can disable this feature in your browser settings. In case if the website will contain advertisement the data on your interaction with such advertisement may be provided to such advertisers provided that you interacted with such advertisement.

Cookies are uniquely assigned to each visitor, and can only be read by a web server in the domain that issued the cookie to the visitor. Cookies cannot be used to run programs or deliver viruses to a visitor’s device.

Persistent cookies remain on a visitor’s device for a set period of time specified in the cookie. They are activated each time that the visitor visits the website that created that particular cookie.

Session cookies are temporary. They allow website operators to link the actions of a visitor during a browser session. A browser session starts when a visitor opens a browser window and finishes when they close it. Once you close the browser, all session cookies are deleted.

Strictly necessary cookies are essential to navigate around a website and to use its features. Without them, visitors would not be able to use basic services like registration. These cookies do not gather information about visitors that could be used for marketing or remembering where a visitor has been on the internet.

Performance cookies collect anonymous data for statistical purposes on how visitors use a website, they don’t contain personal information, and are used to improve the visitor experience.

Functionality cookies allow visitors to customize how a website looks for them: they can remember usernames, language preferences and regions.

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/en-us/HT201265> (Safari);
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you may not be able to use all the features on Website.

You have an option to persistently opt out of any cookie, web beacon, or other tracking mechanism set by us for data collection. In order to opt-out of the cookie or Advertising ID you may send us an email to **privacy@inspiritum.com** or use the following link <https://settings.adsinspidsp.com/>

You can also control your Google ad personalization settings by using the following link <https://www.google.com/ads/preferences>. Please note that disabling Google ad personalization does not result in Google deleting your personal data. You can learn more about Google data ad personalization and other privacy-

related matters handled by Google, as well as about the ways to contact Google using the following link: <https://policies.google.com/privacy>.

Please also note that in addition to the above the Company may perform “cookie matching”. “Cookie matching” is a technology that enables the Company to collect cookies from various sources (and “match” them by matching user IDs, as stated below) and provide superior advertising experience. This may result in cookies already existing on your device to be matched with cookies from other sources, as well as result in transfer of such cookies to our partners. Such cookies, as stated above, do not contain any personally identifiable information about the user.

Company’s cookie matching URL is <https://ads.adsinspidsp.com/>.

The way cookie matching works is the following: when communicating with Google, we provide Google with our cookie matching URL, which is uploaded by Google to various websites. When user visits one of these websites, such user is delegated a user ID (a random set of number and letters) and uID (each user is the previous user’s uid +1). These IDs are used and may be stored by the Company only for technical purposes and do not contain personally identifiable information about the user. When the redirect back to Google occurs, these IDs are matched with the IDs of Google users, so that in the future each user, via their uIDs and user IDs, may enjoy advertising materials that are composed specifically for such uID and user ID, and the Company can tailor and improve its services accordingly.

We understand that you may need additional consultations on the matter and welcome any queries by email or regular mail as specified below. If you have any concerns, we suggest you ask us all the necessary questions before using Company’s services in any way or capacity.

Data Protection

The Company uses reasonable administrative and technical measures to protect your information against loss, theft and unauthorized use, disclosure or modification. Such measures include processing personal data in secure environment and training our personnel for proper handling of personal data.

The Company use implement appropriate technical and organizational measures, including:

- (a) the pseudonymisation and encryption of personal data;
- (b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- (c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- (d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing.

Personal data is processed for as long as the relevant legal basis for processing exists.

Your Rights

Besides your rights stipulated above you have the following rights:

- to request rectification or erasure of personal data or restriction of processing of personal data or to object to such processing;
- to lodge a complaint with a supervisory authority if you consider violation of your rights;
- to correct your inaccurate data;
- to erase your data;
- to restrict processing of your data;
- to demand provision of your data to you in readable form.

Please be aware that your rights might be subject to wider interpretation and derogations provided by applicable law. You may contact us any time for further guidance.

Consent

The website will enable you to provide consent to data processing and opt out of such processing. Opt out may result in unavailability of the website functions to you. The consent interface will provide you with the all information required to make an informed and voluntary consent.

D. PRIVACY-RELATED INQUIRIES AND COMPLAINTS

Company takes and addresses its users’ privacy concerns with utmost respect and attention. If you believe that there was an instance of non-compliance with this Privacy Policy with regard to your personal information or you have other related inquiries or concerns, you may write or contact Company by email as specified below.

In your message, please describe in as much detail as possible the nature of your inquiry or the ways in which you believe that the Privacy Policy has not been complied with. We will investigate your inquiry or complaint promptly.

Please note that if you provide Company with inconsistent privacy preferences (for example, by indicating on one occasion that third parties may contact you with marketing offers and indicating on another occasion that they may not), Company cannot guarantee that your most recent privacy preference will be honored.

The present document is composed in English and has all necessary legal validity. Versions in other languages, if any, are presented for informational purposes only.

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Address: Arch. Makariou III 67C & 2B Orfeos, 2nd floor, Office 204, 1070 Nicosia, Cyprus

Registration number: HE 367859

Any requests to the Company may be provided via the following contacts: **privacy@inspiritum.com**