**Tryll Engine Inc.**

**1. General Provisions**

This personal data processing policy has been drafted in accordance with the requirements of General Data Protection Regulation (GDPR) and other international regulations and determines the procedure for processing personal data and actions to ensure security of personal data of tryllengine.com visitors obtained by Tryll Engine Inc., a legal entity registered in accordance with the laws of State of Delaware, USA, whose registered offices are located at 1201 N. Orange Street, Suite 7587, Wilmington, New Castle County, DE 19801-1186, USA.

1. Tryll Engine Inc. acts as the Operator and (or) Controller and (or) Data Processor in accordance with the terms set forth in applicable laws and General Data Protection Regulation (GDPR). For the purposes of this Privacy Policy, Operator, Controller and Processor, depending on the context, are hereinafter referred to as the general term Tryll.
2. Tryll sets as its most important goal and condition for implementation of its activities the observance of the rights and freedoms of person and citizen in the processing of his personal data, including protection of the rights to privacy, personal and family secrets.
3. This policy of Tryll in relation to processing of personal data (hereinafter - the Policy) applies to all information that Tryll can receive about visitors to the website tryllengine.com.

**2. Main terms used in the Policy**

1. Automated processing of personal data - processing of personal data using computer equipment;
2. Blocking of personal data - temporary termination of processing of personal data (except in cases where the processing is necessary to clarify personal data);
3. Website - a set of graphic and information materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address tryllengine.com;
4. Personal data information system - a set of personal data contained in databases, and information technologies and technical means ensuring their processing;
5. Data Controller - individual or legal person, a state body, an agency or another body that, independently or jointly with others, determines the goals and means of processing of personal data (abstract 7 of article 4 of GDPR).
6. Depersonalization of personal data means actions as the result of which it cannot be determined whether personal data belong to a specific User or other subject of personal data without using additional information;
7. Processing of personal data is any action (operation) or totality of actions (operations) performed using automation facilities, or free from using said facilities with respect to personal data including collection, recording, systematization, accumulation, storage, refinement (updating, modification), extraction, use, transmission, (dissemination, making available, access) depersonalization, blocking, deletion, destruction of personal data.
8. Processor - individual or legal person, state body, agency or other body that processes personal data on behalf of the controller (abstract 8 of article 4 of GDPR).
9. Operator - state body, municipal body, legal or natural person, independently or jointly with other persons organizing and (or) processing personal data, as well as determining the purposes of personal data processing, composition of personal data to be processed, actions (operations) performed with personal data;
10. Personal data - any information relating directly or indirectly to the specific or defined User of the website tryllengine.com (“data subject”); a defined (identified) individual is a person who can be identified directly or indirectly, in particular, on the basis of identification information, such as name, identification number, location data, Internet identifier (online identifier) or through one or several indicators characteristic of the physical, physiological, genetic, mental, economic, cultural or social identity of the individual;
11. User - any visitor of tryllengine.com web-site;
12. Provision of personal data - actions aimed at disclosing personal data to a specific person or a certain circle of persons;
13. Dissemination of personal data - any actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or acquaintance with personal data of an unlimited number of persons, including public disclosure of personal data in media, publication in information and telecommunication networks or access to personal data in any other way;
14. Cross-border transfer of personal data - transfer of personal data to the territory of a foreign state, to the authority of foreign state, foreign natural or foreign legal entity;
15. Destruction of personal data - any actions that result in personal data being irretrievably destroyed, with impossibility of further restoring the content of personal data in personal data information system and (or) as the result of which physical media of personal data are destroyed.

**3. Tryll can process the following personal data of the User**

1. Email address (if the user gave it to Tryll);
2. First name and/or last name of the user (if the user reported them to Tryll);
3. Other information that is personal data, if the user has reported it to Tryll;
4. Also collection and processing of impersonal data about visitors (including cookies) using Internet statistics services (Google Analytics) is executed at the site.
5. The above data is hereinafter referred to as the general concept of Personal Data in the text of the Policy.
6. When a user views the tryllengine.com website, Tryll receives that Personal User data that the browser automatically sends to Tryll servers and/or data storage and processing services used by Tryll. The following information is collected without user participation and is stored in a log file:

* IP address of the computer (without the last four digits), from which the website is being accessed,
* date and time of access to the website,
* search query that you clicked on to the website or pointing to another web resource from which you moved to tryllengine.com,
* website pages visited,
* name and version of browser,
* operating system of your computer and language of its interface.

1. The above data is used by Tryll for safe and stable operation of our website. In particular, to ensure high-quality connectivity, comfortable use of the website, as well as to assess stability and security.

**4. Cookies**

1. Along with the data mentioned in article 3 above, using tryllengine.com website, cookies can be stored on the user's device.

Cookies are small text files that are stored on the user's device and are associated with the browser they use. Cookies contain certain information and are used to make our site more convenient and efficient, as well as to improve our products and services.

We cannot recognize your identity through cookies and cookies cannot launch programs or transmit viruses to your computer.

1. Our website uses the following cookies:

* Session cookies that Tryll uses to assign a unique identification number to a user's device each time a user visits a website. Session cookies are deleted after closing the browser. They are used to maintain the functionality of the site and to analyze how users interact with the site: for example, which pages users visit, which links they use and how long they stay at each page, which pages are most popular. The above data is used by Tryll for safe and stable operation of our website. In particular, to ensure high-quality connectivity, comfortable use of the website, as well as to assess stability and security.
* Cookies-files of third-party services, namely Google Analytics and Tilda On cookies, which are set by third-party services, we inform you in paragraph 5 of the policy.

1. Data processed through the use of cookies is designed to ensure safe and stable operation of our website, as well as to collect anonymous statistical information about use and visiting of our website.
2. User can visit tryllengine.com without cookies, for which you need to change the settings of your browser in order to prohibit the receipt of cookies. But in this case, you cannot use all the features of our site.
3. Browsers are usually set to accept cookies. However, you can disable cookies by configuring your browser settings. You can also configure your browser settings to enable certain cookies or notify you each time a new cookie is stored on your computer so that you can decide whether to accept or reject the cookie. Various resources are available to manage your use of cookies, for example, Help section in your browser.

**5. Purposes of personal data processing Additional functions of website/Integration of third-party services**

1. Purpose of User personal data processing is to inform the User about news in subject areas, in which Tryll Company operates, as well as about company news by sending e-mails.
2. Tryll also has 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 informational messages by sending Tryll a letter to privacy@tryllengine.com e-mail address marked “Refusal to receive notifications about new products and services and special offers”.
3. Impersonal User data collected using Internet statistics services are used to collect information about the actions of Users on the website, improve the quality of the website and its content.
4. In addition to the ability to view the website tryllengine.com, Tryll offers users various additional features that you can actively use if you are interested. To do this, the user may need to provide additional personal information that is used to provide the relevant service.
   1. Responses to user enquiries:

Users have the opportunity to send a request through the **contact form** to Tryll. To do this, we ask you to provide the following information:

* Your name (optional),
* e-mail (to provide a response by Tryll) (required),
* Subject of enquiry: description of the problem/your question (required).

Tryll uses the data listed to provide the user with an accurate response to the enquiry. Tryll also stores enquiries received via the website to collect statistics on failures in operation of our products, with a view to their development and improvement.

* 1. Mailing campaigns

If you want to receive our free mailing campaigns by e-mail, in which we talk about company news, our promotions and offers, you need to subscribe to our website once, indicating only your e-mail address.

After that, we will save your email address to send you our postal mailing. Your address will be used only for the purpose of sending you our postal mailing.

You can unsubscribe from our postal mailing at any time. To do this, click on the appropriate hyperlink specified in each email. In this case, we will stop mailing to your address and within a month we will delete your e-mail from our database.

1. Third-party services

At the website tryllengine.com Tryll uses Google Analytics to collect information about use of our website. Using them we assess how our website is used. For example, which link you used to come to our website, which pages you have viewed. This information helps us to improve our site and make it more convenient.

Google, which provides Google Analytics, also reserve the right to collect data.

Data collection by third-party services is carried out through cookies. You can:

* **Separately for Google Analytics:** (a) Change cookie settings and completely disable these features on the Advertising preferences page; (b) prevent Google from tracking cookies by downloading and installing a special browser plugin: http://tools.google.com/dlpage/gaoptout?hl=en
* block saving of any cookies by selecting the appropriate settings in your browser.

Tryll collects and uses e-mails specified by users when subscribing to postal mailing in accordance with this Policy.

Tryll is not responsible for the method third-party services used by Tryll collect and process user data. Own conditions of data processing adopted by the appropriate services can be applied to data processing.

**6. Legal basis of personal data processing**

1. Tryll processes the User’s personal data only if it is filled out and/or sent by the User independently through special forms located at tryllengine.com or via email. By filling out the appropriate forms and/or sending your personal data to Tryll, the User agrees with this Policy.
2. Tryll processes impersonal data about the User, if it is allowed in the settings of the User’s browser (preservation of cookies and use of JavaScript technology are enabled).

**7. Rights of the user in relation to his personal data**

In accordance with this Policy, any user of tryllengine.com has the following rights with respect to personal data relating to this user:

1. **The right to information and the right of access:** the user has the right to request information about his personal data processed by Tryll, to require access to his personal data, to receive information about the purposes of processing, the rights of the data subject, the retention period of the data, the categories of data being processed, the recipients which personal data of the user can be disclosed to, etc.
2. **Right to correction:** the user has the right to immediately request correction of incorrect or incorrectly filled personal data processed by Tryll, addition of incomplete personal data.
3. **The right to cancel and delete data (“right to oblivion”):** the user has the right to require Tryll to delete his personal data stored by Tryll in cases when:
   1. personal data is no longer needed for the purposes for which it was collected or otherwise processed;
   2. data subject has withdrawn his consent, on the basis of which the processing was carried out, and also if there is no other legal basis for processing;
   3. data subject objects to processing;
   4. personal data has been processed improperly;
   5. personal data shall be deleted in accordance with the requirements of applicable law.
4. **The right to limit processing:** the user has the right to request a restriction on the processing of his personal data stored by Tryll.
5. **The right to withdraw consent to processing and the right to object to processing:** the user has the right to withdraw at any time his consent, on the basis of which processing was carried out, or to object to further processing of data.
6. **Right to data portability:** the user has the right to receive his personal data that was provided to Tryll in a structured, commonly used and machine-readable format, and also to request its transfer to another responsible person. The user has the right to transfer his personal data directly from one responsible person to another, if it is technically feasible.
7. The user has the right **to file a complaint** with the data protection supervision authority regarding the processing of his personal data by Tryll.

The user can exercise any of his rights listed above by making a request to Tryll at privacy@tryllengine.com

**8. Order of collection, storage, transfer and other types of personal data processing**

Security of personal data that is processed by Tryll is ensured by implementing the legal, organizational and technical measures necessary to fully implement the requirements of the applicable law in the field of personal data protection.

Tryll ensures the safety of personal data and takes all possible measures to prevent access to personal data by unauthorized persons.

1. Personal data of the User will never, under any circumstances, be passed to the third parties, with the exception of cases related to the execution of current legislation.
2. However, transfer of user personal data to the third parties is possible solely for the following purposes and under the following conditions:

* after giving explicit consent by the user,
* disclosure of information is necessary to ensure or protect the legitimate interests of Tryll,
* processing is necessary to comply with legal obligations to which Tryll is a subject,
* to the extent permitted by law and necessary for execution of the contract with the user.

1. In case of detection of inaccuracies in personal data, the User can update it independently by sending a notice to the email address of Tryll at privacy@tryllengine.com with the mark “Update of personal data”.
2. The term for processing of personal data, unless otherwise specified in other articles of this Policy, is unlimited. The user may at any time withdraw his consent to the processing of personal data by sending a notification via e-mail to Tryll address privacy@tryllengine.com with the note “Withdrawal of consent to the processing of personal data”.

**9. Cross-border transfer of personal data**

1. Tryll, prior to commencement of cross-border transfer of personal data, is obliged to ensure that the foreign state, to which territory it is intended to transfer personal data, ensures reliable protection of the rights of personal data subjects.
2. Cross-border transfer of personal data at the territory of foreign countries that does not meet the above requirements can only be carried out if there is a written consent of the subject of personal data on the cross-border transfer of his personal data and/or performance of the contract, to which the subject of personal data is a party.

**10. Final provisions**

1. The user can receive any clarification on issues of interest related to processing of his personal data by contacting Tryll via email privacy@tryllengine.com.
2. To be able to respond to the enquiry, the user shall specify a valid email address. In case of sending e-mail messages to Tryll, Tryll will save information provided by the user, for example, e-mail, name or phone number to respond to the user's request. If the storage of this data is no longer required, Tryll will delete the collected personal data. If the law establishes the obligation to store data, Tryll restricts any processing of data transferred by the user.
3. This document will reflect any changes in the personal data processing policy of Tryll. The policy is valid indefinitely until replaced with a new version.
4. The current version of the Policy is freely available on the Internet at https://tryllengine.com/policy.