

PERSONAL POLICY

1. General Provisions

1.1. The present Personal policy (hereinafter referred to as the "**Policy**") is elaborated to protect the rights and freedoms of individuals and citizens upon processing their personal data, including the protection of the right to inviolability of private life, personal and family secret. Our privacy policy is based on the General Data Protection Regulation (GDPR) of the European Union.

1.2. The Policy applies to all personal data being processed by Website (hereinafter referred to as the "**Operator**").

1.3. The Policy applies to the relations in the field of personal data processing incurred by the Operator both before and after the approval of this Policy.

1.4. This Policy is published in a free access to the information and telecommunication network of the Internet on the Operator's website - <https://otp-ninja.com>.

1.5. Basic concepts used in the Policy:

automated processing of personal data-processing of personal data with the help of computer equipment;

blocking of personal data-temporary termination of personal data processing (with the exception of cases when processing is necessary to clarify personal data);

personal data information system-a set of personal data contained in databases and information technologies and technical means that ensure their processing;

depersonalization of personal data-actions as a result of which it becomes impossible to determine the affiliation of personal data to a particular subject of personal data without the use of additional information;

personal data operator (Operator)-Company, carrying out personal data processing independently, as well as determining the purposes of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data;

personal data processing-any action (operation) or a set of actions (operations) with personal data performed using automation means or without their use. The processing of personal data includes, inter alia:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- clarification (update, modification);
- extraction;
- usage;
- transfer (dissemination, provision, access);
- depersonalization;
- blocking;
- removal;
- destruction;

personal data-any information relating directly or indirectly to a certain or identifiable natural person (subject of personal data);

dissemination of personal data-actions aimed at disclosure of personal data to an indefinite circle of persons;

provision of personal data-actions aimed at disclosure of personal data to a certain person or a certain circle of persons;

website (Website)-a website on the Internet, located on the domain name <https://otp-ninja.com>;

personal data subjects (users)-the Operator's customers (natural persons) on the otp-ninja.com Website.

destruction of personal data-actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system.

1.6. Basic rights and obligations of the Operator.

1.6.1. The Operator has the right to:

- 1) independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations;
- 2) in case the subject of personal data withdraws consent to the processing of personal data, the Operator stops the personal data processing.

1.6.2. The Operator is obliged to:

- 1) organize the processing of personal data;
- 2) respond to queries and requests of users;

1.7. Basic rights of the user. The user has the right to:

- 1) receive information concerning the processing of his personal data within 30 (thirty) calendar days from the date of the request. The data is provided to the user by the Operator in an accessible form, and it should not contain personal data related to other subjects' personal data, with the exception of cases when there are lawful basis for disclosure of such personal data;
- 2) require from the Operator clarification of his personal data, block or destroy them in the case the personal data is incomplete, obsolete, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, within 7 (seven) business days from the date of the request, as well as take measures stipulated by law to protect their rights.

1.8. Control over the fulfillment of the requirements of this Policy is carried out by the Operator.

2. Purposes of Personal Data Collection

2.1. The processing of personal data is limited to the achievement of particular, predetermined and lawful purposes. Processing of personal data incompatible with the purposes of collecting personal data is not permitted.

2.2. Only personal data that meet the purposes of their processing are subject to processing.

2.3. The processing of personal data by the Operator is carried out for the following purposes:

- ensuring compliance with the legislation of the European Union and the United Arab Emirates;
- implementation by the Operator of its business activities on the Website, for the preparation, conclusion, execution and termination of contracts with customers (users);
- execution of judicial acts, acts of other state bodies and officials;
- other legitimate purposes.

2.4. The Operator also has the right to send notifications to users about new services, special offers and various events. The user can always refuse to receive informational messages by sending a message to the Operator by the address: abuse@otp-ninja.com.

3. Scope and Categories of Processed Personal Data, Categories of Personal Data Subjects

3.1. The content and scope of the processed personal data should comply with the stated processing purposes prescribed in section 2 of this Policy. The processed personal data should not be redundant in connection to the stated purposes of their processing. We collect and process your personal data only upon your willing consent.

3.2. Upon your permission, we can collect and process the following data:

- contact data (the address of the user's Email contact box);
- name and surname;
- phone number;
- bank card information;
- user data (location information; OS type and version; Browser type and version; device type and screen resolution; source from where the user came to the Website; from what website or from what advertisement; OS and Browser language; which pages the user opens and which buttons he clicks on; IP address);
- other personal data provided by customers (natural persons) necessary for the preparation, conclusion, execution and termination of contracts with the Operator on the Website.

3.2.1. On the Website it is also carried out collection and processing of depersonalized data about the Operator's customers (cookies) with the help of Internet statistics services (Yandex.Metrica, Google Analytics and others). More details can be found in the "Rules for the use of "cookies"" by the address: <https://otp-ninja.com/docs2/cookies.pdf>.

3.3. The processing of biometric personal data (data characterizing the physiological and biological features of a person, on the basis of which his identity can be established) is not carried out by the Operator.

3.4. The processing of special categories of personal data concerning race, nationality, political views, religious or philosophical beliefs, health status, intimate life is not carried out by the Operator.

4. The Order and Terms of Personal Data Processing

4.1. The processing of personal data is carried out by the Operator in compliance with the requirements of the General Data Protection Regulation (GDPR) of the European Union.

4.2. The processing of personal data is carried out upon the consent of the personal data subjects to the processing of their personal data.

4.3. The Operator carries out automated processing of personal data.

4.4. The processing of personal is carried out by:

- entering personal data into the Operator's information system;
- using other methods of personal data processing.

4.5. The disclosure of personal data to the third parties and the dissemination of it without the consent of the personal data subject are not permitted.

4.6. The transfer of personal data to the bodies of inquiry and investigation, to the Federal Tax Service and other authorized executive authorities and organizations is carried out in accordance with the requirements of the legislation.

4.7. The Operator takes the necessary legal, organizational and technical measures to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, dissemination and other unsanctioned actions.

5. Update, Correction, Removal and Destruction of the Personal Data, Answers to Requests of the Subjects on Access to the Personal Data

5.1. Confirmation of the personal data processing fact by the Operator is provided by the Operator to the user upon receiving the user's request to the Operator's Email abuse@otp-ninja.com within 30 (Thirty) calendar days after receiving the request.

In the provided data it is not included personal data relating to other subjects of personal data, with the exception of cases when there are lawful basis for the disclosure of such personal data.

The request should contain:

- data confirming the user's participation in relation to the Operator (the date of conclusion of the contract-public offer and (or) other data), or data otherwise confirming the fact of processing personal data by the Operator;
- user signature.

The request is sent in the form of an electronic document and is signed with an electronic signature. An electronic signature by the agreement of the Parties will be considered sending a request from the user's contact Email address specified by him upon registration on the Website.

If in the request of the personal data subject it is not reflected all the necessary information in accordance with the requirements of the Law on Personal Data, or the subject does not have access rights to the requested information, a reasoned refusal is sent to him.

5.2. Time, during which your personal data will be stored: is the time the personal data is used which is necessary for the Website's main activity. The user can withdraw his consent to the processing of personal data at any time by sending a notification to the Operator with the help of an Email to the Operator's Email address: abuse@otp-ninja.com.

5.3. In case of withdraw of the consent to their processing by the users, personal data is subject to destruction.

5.4. The user can receive any clarifications on issues of interest regarding the processing of his personal data by referring to the Operator with the help of Email: abuse@otp-ninja.com.

5.5. In the given document will be reflected any amendments to the personal data processing policy by the Operator. In case of significant amendments, the User may be sent information to the Email address specified by him upon registration on the Website.