



Tribes European Quarter, Avenue Marnix 13-17, 1000 Brussels, Belgium

One Canada Square, 37th Floor, Canary Wharf, E14 5AA London, UK

Pärnu maantee 10, Profia Arvestuse, 10148 Tallinn, Estonia

Privacy Policy

We respect your privacy and are committed to protecting it through our compliance with this privacy policy ("Policy"). This Policy describes the types of information we may collect from you or that you may provide ("Personal Information") on the <https://etelatar.com/> website ("Website" or "Service") and any of its related products and services (collectively, "Services"), and our practices for collecting, using, maintaining, protecting, and disclosing that Personal Information. It also describes the choices available to you regarding our use of your Personal Information and how you can access and update it.

This Policy is a legally binding agreement between you ("User", "you" or "your") and Etelätär Innovation O.Ü. ("Etelätär Innovation", "we", "us" or "our"). If you are entering into this Policy on behalf of a business or other legal entity, you represent that you have the authority to bind such entity to this Policy, in which case the terms "User", "you" or "your" shall refer to such entity. If you do not have such authority, or if you do not agree with the terms of this Policy, you must not accept this Policy and may not access and use the Website and Services. By accessing and using the Website and Services, you acknowledge that you have read, understood, and agree to be bound by the terms of this Policy. This Policy does not apply to the practices of companies that we do not own or control, or to individuals that we do not employ or manage.



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01 – Automatic collection of information

When you open the Website, our servers automatically record information that your browser sends. This data may include information such as your device's IP address, browser type, and version, operating system type and version, language preferences or the webpage you were visiting before you came to the Website and Services, pages of the Website and Services that you visit, the time spent on those pages, information you search for on the Website, access times and dates, and other statistics.

Information collected automatically is used only to identify potential cases of abuse and establish statistical information regarding the usage and traffic of the Website and Services. This statistical information is not otherwise aggregated in such a way that would identify any particular User of the system.

02 – Privacy of children

We do not knowingly collect any Personal Information from children under the age of 13. If you are under the age of 13, please do not submit any Personal Information through the Website and Services. If you have reason to believe that a child under the age of 13 has provided Personal Information to us through the Website and Services, please contact us to request that we delete that child's Personal Information from our Services.

We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy by instructing their children never to provide Personal Information through the Website and Services without their permission. We also ask that all parents and legal guardians overseeing the care of children take the necessary precautions to ensure that their children are instructed to never give out Personal Information when online without their permission.

03 – Use and processing of collected information

We act as a data controller and a data processor when handling Personal Information, unless we have entered into a data processing agreement with you in which case you would be the data controller and we would be the data processor.



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Our role may also differ depending on the specific situation involving Personal Information. We act in the capacity of a data controller when we ask you to submit your Personal Information that is necessary to ensure your access and use of the Website and Services. In such instances, we are a data controller because we determine the purposes and means of the processing of Personal Information.

We act in the capacity of a data processor in situations when you submit Personal Information through the Website and Services. We do not own, control, or make decisions about the submitted Personal Information, and such Personal Information is processed only in accordance with your instructions. In such instances, the User providing Personal Information acts as a data controller.

In order to make the Website and Services available to you, or to meet a legal obligation, we may need to collect and use certain Personal Information. If you do not provide the information that we request, we may not be able to provide you with the requested products or services. Any of the information we collect from you may be used for the following purposes:

- Send product and service updates;
- Request user feedback;
- Run and operate the Website and Services.

Processing your Personal Information depends on how you interact with the Website and Services, where you are located in the world and if one of the following applies: (i) you have given your consent for one or more specific purposes; (ii) provision of information is necessary for the performance of this Policy with you and/or for any pre-contractual obligations thereof; (iii) processing is necessary for compliance with a legal obligation to which you are subject; (iv) processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in us; (v) processing is necessary for the purposes of the legitimate interests pursued by us or by a third party.

Note that under some legislations we may be allowed to process information until you object to such processing by opting out, without having to rely on consent or any other of the legal bases. In any case, we will be happy to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Information is a statutory or contractual requirement, or a requirement necessary to enter into a contract.



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04 – Disclosure of information

Depending on the requested Services or as necessary to complete any transaction or provide any Service you have requested, we may share your information with our affiliates, contracted companies, and service providers (collectively, "Partners") we rely upon to assist in the operation of the Website and Services available to you and whose privacy policies are consistent with ours or who agree to abide by our policies with respect to Personal Information. We will not share any personally identifiable information with third parties and will not share any information with unaffiliated third parties.

Partners are not authorized to use or disclose your information except as necessary to perform services on our behalf or comply with legal requirements. Partners are given the information they need only in order to perform their designated functions, and we do not authorize them to use or disclose any of the provided information for their own marketing or other purposes.

We may also disclose any Personal Information we collect, use or receive if required or permitted by law, such as to comply with a subpoena or similar legal process, and when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

05 – Retention of information

We will retain and use your Personal Information for the period necessary to comply with our legal obligations, to enforce our Policy, resolve disputes, and unless a longer retention period is required or permitted by law.

We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally. Once the retention period expires, Personal Information shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification, and the right to data portability cannot be enforced after the expiration of the retention period.

06 – Retention of information

Our Website and Services use "cookies" to help personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to



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your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

We may use cookies to collect, store, and track information for security and personalization, and for statistical purposes. Please note that you have the ability to accept or decline cookies. Most web browsers automatically accept cookies by default, but you can modify your browser settings to decline cookies if you prefer.

You can access our Cookies Policy via the Website.

07 – Data analytics

Our Website and Services may use third-party analytics tools that use cookies, web beacons, or other similar information-gathering technologies to collect standard internet activity and usage information. The information gathered is used to compile statistical reports on User activity such as how often Users visit our Website and Services, what pages they visit and for how long, etc. We use the information obtained from these analytics tools to monitor the performance and improve our Website and Services. We do not use third-party analytics tools to track or to collect any personally identifiable information of our Users and we will not associate any information gathered from the statistical reports with any individual User.

08 – Do Not Track signals

Some browsers incorporate a Do Not Track feature that signals to websites you visit that you do not want to have your online activity tracked. Tracking is not the same as using or collecting information in connection with a website. For these purposes, tracking refers to collecting personally identifiable information from consumers who use or visit a website or online service as they move across different websites over time. How browsers communicate the Do Not Track signal is not yet uniform. As a result, the Website and Services are not yet set up to interpret or respond to Do Not Track signals communicated by your browser. Even so, as described in more detail throughout this Policy, we limit our use and collection of your Personal Information. For a description of Do Not Track protocols for browsers and mobile devices or to learn more about the choices available to you, visit <https://www.internetcookies.com/>.



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09 – Data transfer

Our servers are located inside the EU and where possible we opt for Third Party Services with servers in the EU but we may also use or be dependent on Third Party Services who use servers outside of the EU. Therefore, personal information that you submit through our website may be transferred to states, provinces, countries, other than where you live, namely in the USA, where the data protection laws may differ than those from your jurisdiction.

These services may also store personal information locally on the devices you use to access the Services.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

The means to transfer personal information are subject to: (a) the European General Data Protection Regulation ("GDPR") in accordance with Chapter V of the GDPR; or (b) applicable UK data privacy laws in accordance therewith. References to GDPR and its provisions include the GDPR as amended and/or incorporated into UK law. These include:

1. Standard data protection clauses: In accordance with Article 46 of the GDPR, personal information may be transferred to recipients that have entered into the European Commission approved contract for the transfer of personal data outside the European Economic Area ("EEA"). Additionally, in accordance with UK law, personal information may be transferred to recipients that have entered into the UK Information Commissioner's Office approved international data transfer agreement and the UK addendum to such European Commission approved contract.
2. Other means: In accordance with Articles 45 and 46 of the GDPR, personal information may be transferred to recipients that are in a country the European Commission or a European or UK data protection supervisory authority have approved to offer an adequate level of data protection. Including but not limited to approved certification mechanisms or code of conducts, together with binding, enforceable commitments from the recipient to apply the appropriate safeguards, including as regards data subjects' rights, or to processors which have committed to comply with binding corporate rules.

Our Third Party Services may perform service-related services or assist us in analyzing how the website is used, with seats in the EEA, Switzerland and the UK pursuant to the EU-U.S. Data Privacy Framework, the Swiss-U.S.



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Data Privacy Shield Framework and the UK Extension to the EU-U.S. Data Privacy Frameworks (each individually and jointly, the "Data Privacy Frameworks"). In accordance with Article 45 of the GDPR, an adequacy decision was adopted for the EU-U.S., Swiss-US and UK Extension to the EU-US Data Privacy Frameworks.

You can find out more information about data transfer inside and outside the EU [here](#).

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

11 – Links to other resources

The Website and Services contain links to other resources that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other resources or third parties. We encourage you to be aware when you leave the Website and Services and to read the privacy statements of each and every resource that may collect Personal Information.

12 – Information security

We secure information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use, or disclosure. We maintain reasonable administrative, technical, and physical safeguards in an effort to protect against unauthorized access, use, modification, and disclosure of Personal Information in our control and custody. However, no data transmission over the Internet or wireless network can be guaranteed.

Therefore, while we strive to protect your Personal Information, you acknowledge that (i) there are security and privacy limitations of the Internet which are beyond our control; (ii) the security, integrity, and privacy of any and all information and data exchanged between you and the Website and Services cannot be guaranteed; and (iii) any such information and data may be viewed or tampered with in transit by a third party, despite best efforts.



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13 – Data breach

In the event we become aware that the security of the Website and Services has been compromised or Users' Personal Information has been disclosed to unrelated third parties as a result of external activity, including, but not limited to, security attacks or fraud, we reserve the right to take reasonably appropriate measures, including, but not limited to, investigation and reporting, as well as notification to and cooperation with law enforcement authorities. In the event of a data breach, we will make reasonable efforts to notify affected individuals if we believe that there is a reasonable risk of harm to the User as a result of the breach or if notice is otherwise required by law. When we do, we will post a notice on the Website, send you an email.

14 – Changes and amendments

We reserve the right to modify this Policy or its terms related to the Website and Services at any time at our discretion. When we do, we will revise the updated date at the bottom of this page. We may also provide notice to you in other ways at our discretion, such as through the contact information you have provided.

An updated version of this Policy will be effective immediately upon the posting of the revised Policy unless otherwise specified. Your continued use of the Website and Services after the effective date of the revised Policy (or such other act specified at that time) will constitute your consent to those changes. However, we will not, without your consent, use your Personal Information in a manner materially different than what was stated at the time your Personal Information was collected.

15 – Acceptance of this policy

You acknowledge that you have read this Policy and agree to all its terms and conditions. By accessing and using the Website and Services and submitting your information you agree to be bound by this Policy. If you do not agree to abide by the terms of this Policy, you are not authorized to access or use the Website and Services.



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16 – Contacting us

If you have any questions, concerns, or complaints regarding the Policy, the information we hold about you, or if you wish to exercise your rights, we encourage you to contact us using the details below:

systems@etelatar.com

We will attempt to resolve complaints and disputes and make every reasonable effort to honour your wish to exercise your rights as quickly as possible and, in any event, within the timescales provided by application data protection laws.

This document was last updated on October 23, 2023.