



## **CONFIDENTIALITY POLICY OF UNPKDO EXPERT EDUCATION PORTAL**

We, Tsar Gift LLC, vul. Poltavskiy Shliakh 4, off. 412, Kharkiv, Ukraine, 61052.

The "UNPKDO EXPERT EDUCATION" Portal means interactive online tools operated by Tsar Gift LLC, available at <https://expert.education>.

All the expressions ("we", "us" or "our") found hereinafter in the text should be interpreted as indicating the belonging to Tsar Gift LLC and the UNPKDO EXPERT EDUCATION Portal.

In order to regulate issues related to the collection and storage of the personal data, the UNPKDO EXPERT EDUCATION, guided by the Law of Ukraine "On Personal Data Protection" (Document № 2297-VI) and other regulatory legal acts governing legal relations related to protection and processing of personal data (Article 1 of the Law of Ukraine "On Personal Data Protection"), developed this Privacy Policy (hereinafter referred to as the Document).

### **WHEN WE ACT AS THE CONTROLLER AND AS THE PROCESSOR**

The UNPKDO EXPERT EDUCATION Portal will act as the "Controller" of personal data that you provide to us when applying by means of the "Contact Us" / "Support" form, when registering, or through other modes of data transfer. You do not need to provide personal information to view the public pages of our website.

If you are an employee or an authorized representative of one of our customers who has entered into the Service Agreement with us, we will act as the "Processor" of your personal data transmitted by our customer. Our client will act as the Controller of your personal information. As the Processor, we do not own, control or use any data provided to us by our customers who act as the Controllers.

### **PERSONAL IDENTIFICATION INFORMATION**

"Personal Identification Information" (or the "PII") refers to the contact information that directly or indirectly identifies you, such as your name, phone number, country and city, company name, email address, IP address, or any other information that can be easily linked to you. We do not collect confidential information, such as GPS information, racial or ethnic origin, political views, religious or philosophical beliefs, or trade union membership, genetic or biometric data, data on the health or sexual life of an individual.

### **DATA COLLECTED PASSIVELY OR AUTOMATICALLY**

Our affiliated persons, our marketing partners and we may use automated tools to collect various types of information about you, your computer or other device used to access the Portal, its services, related web applications and downloaded software. This information is based on your use of the Portal and may be obtained when you visit other websites. The Usage Data is essentially anonymous, but may be used indirectly to identify a person.

### **WHY WE NEED YOUR DATA**

We need to know your PII that you provide to us when we act as the Controller so that we can respond to your request from the page "Contacts" and through other modes of feedback. In addition, we need to know your PII to send you emails and for other purposes, including those ones for the exchange of PII as described in the section "Exchange and disclosure of information" below. We also need to know the PII of the Users who are authorized representatives of our customers when we act as the Processor in order to regulate the use of our services by the authorized User.

### **HOW WE COLLECT AND USE YOUR DATA**

The UNPKDO EXPERT EDUCATION portal collects the PII directly from you when you send us messages indicating your e-mail in the form "Contact us" / "Support" on our web pages or through other modes of feedback, as well as when registering on the website.

When you register on the UNPKDO EXPERT EDUCATION Portal or use the PayAllWays or PayAllWays PRO plug-in, you agree to the collection of your PII and agree to send you emails, including the use of the PII for promotional mailings to promote our services or tools. You can revoke your consent at any time by unsubscribing from our emails using an opt-out link contained in each email. The UNPKDO EXPERT EDUCATION Portal uses third-party applications to add information to the data we collect from you. This data enhancement allows us to provide a more useful personalized connection.

We collect the usage data as described above and cookie data. For more information and how to set your browser to opt out of cookie files, see the "Cookie files and opt-out procedures" section below.

We may use the Usage Data indefinitely for any purpose including, without limitation, for the customization of remarketing (excluding the European Union), offers and content shown to you based on your visits and / or use of this Portal or its services, and also for the analysis of the effectiveness of advertising, offers and content, as well as your interaction with them.

Taking into account your right of opt-out, we may combine the Usage Data with the PII that we collect and use the combined data to create profiles about you solely to improve our services and tools and to improve your user experience on our Portal.

ТОВ "Царський Подарунок"

Адреса: 61052, вул. Полтавський Шлях, 4, офіс 412 Харків, Україна.

Tel.: +380671229159 (UA)

Email: [info@expert.education](mailto:info@expert.education)



## HOW LONG WE STORE YOUR DATA

We will not store your PII longer than necessary. This means that we will store your PII for any period of time described below (or combinations thereof):

- as long as it is required by law;
- as long as we do not have a sufficient reason to keep it;
- until you ask us to stop using it;
- as long as our client, for whom you, as our User, are an authorized representative, remains a client.

When we remove your PII from our databases, it will remain in our backup system until it is automatically deleted.

## EXCHANGE AND DISCLOSURE OF INFORMATION

General policy of disclosure of information. We may share and disclose your PII as described below. We may disclose and share your Usage Data without restriction including the situations described below. Please contact us at [info@expert.education](mailto:info@expert.education) to refuse to share your information with third parties.

**Affiliated persons.** We may provide your PII and Usage Data to any affiliated companies we may have, including our subsidiaries. Affiliated persons are companies which we legally control or they control us.

**Subprocessors.** We may provide access to your PII and Usage Data to our trusted Subprocessors to assist us in customization and maintenance of this site. For example, we may enter into agreements with third parties to process payments, host servers, provide security, and render services for the creation, support, optimization, analytics, reporting, technical maintenance and development of software. In addition, our Subprocessors will be granted access to your information only if it is really necessary to render the services specified in the agreements.

**Legal successors.** If we sell or otherwise transfer part or all of our business or assets to another entity (for example, by means of an acquisition, merger, bankruptcy, or liquidation), we may transfer your PII and Usage Data. In that case, we undertake to ensure that the buyer or recipient agrees to the obligations set forth in this Privacy Policy.

**Compulsory obligations.** Except for the exchange of your information, as described in this section "Exchange and disclosure of information", the UNPKDO EXPERT EDUCATION tools will NOT disclose information about you or the content of your messages, unless it is forced to do it due to the circumstances in one of the following cases when it is really necessary:

- (A) to comply with the law;
- (B) in case of legal proceedings;
- (C) in order to comply with these terms and conditions;
- (D) in case of complaints regarding content that infringes the rights of third parties;
- (E) to ensure that the terms of the acquisition of the UNPKDO EXPERT EDUCATION Portal or its merger with another company are met;
- (F) to protect the interests of the UNPKDO EXPERT EDUCATION Portal in relation to its property including, but not limited to, its intellectual property.

**Authorized Resellers.** We may transfer your PII and Usage Data to our authorized resellers and partners so that they can provide customers with timely and useful information about our tools and services. Our resellers agree to abide by the privacy policy of the UNPKDO EXPERT EDUCATION Portal, but they cannot share your information with any other third parties.

**Marketing partners for remarketing.** We may share your information with third-party tools for remarketing purposes. A description of remarketing and opt-out rights can be found in the "Remarketing" section below.

## COOKIE FILES AND OPT-OUT PROCEDURES

The UNPKDO EXPERT EDUCATION Portal may automatically collect the Usage Data using cookie files. Cookies are small text files that the website uses to recognize repeated visits of the Portal by the Users, to ensure constant access of the User to the site and to facilitate the use of the site. Cookies also allow the site to track the Users' behavior and collect information about the use of the site, which will improve the content.

You can opt out of cookies by enabling settings in your browser that allow you to opt out of cookies storage. However, if you select this option, you will not be able to access certain parts of our site. If you do not specify a cookie opt-out option in your browser settings, our system will use cookies when you log in to our site.

## REMARKETING

The UNPKDO EXPERT EDUCATION portal uses third-party tracking codes such as Google tools. Learn more: <https://policies.google.com/privacy?hl=uk>.

## ANALYTICS

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We may connect third-party analytics tools to monitor and analyze web traffic and track user behaviour on this site. Google Analytics (Google). Google Analytics is a web analytics service provided by Google Inc. ("Google"). Google uses the data collected to track and study the use of this site by users, to prepare reports on the activity of the site and to share this data with other Google services.

Collected Information: Cookies and Usage Data. Go to the Privacy Policy at <https://www.google.com/intl/ru/policies>. You can opt out of Google Analytics using the Google browser add-on, which is available at <https://tools.google.com/dlpage/gaoptout>.

#### **YOUR RIGHTS**

You can contact us to find out if we process your PII. If so, you can ask us what Personal Identification Information we store and what we do with your data. If required, we may provide you (or, if technically possible, a third party you specify) with a copy of any PII we hold about you for a fee established by law (not exceeding the cost of reproducing these documents).

We may decline a request for access to or correction of the PII in the circumstances provided by law. And, if we do it, we will send you a written notice with the reasons for decline.

In addition, you can:

- request access and correction or deletion of your PII,
- request restrictions on the processing of your PII,
- withdraw your consent at any time.

If you request us to exercise any of the above rights, we will, if necessary, send a message about your request to other authorized parties that store and process your PII.

#### **REPORT ON VIOLATION OF CONFIDENTIALITY FOR USERS IN THE EUROPEAN UNION**

Tsar Gift LLC undertakes to consent to submission of complaints about the rules of storage or use of your personal information. EU residents who have any inquiries or complaints about our Privacy Policy should first contact Tsar Gift LLC at [info@expert.education](mailto:info@expert.education). You can complain about unresolved confidentiality disputes to EU data protection authorities \*. Contact information for EU data protection authorities can be found at [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

Tsar Gift LLC will cooperate with the relevant authorities in the cases regarding EU data protection within the investigation and settlement of the complaints lodged.

As the last resort, privacy complaints that remain unsettled after using these and other channels must be subject to mandatory internal arbitration before the European Commission establishes the Privacy Protection Commission.

#### **LINKS TO OTHER SITES**

This site may contain links to other websites. If you click on any links to websites or agree to any advertising offers, your information that you provide during the registration or purchase process will be transferred to those sites. We are not liable for the policy and actions of these sites. You must be careful and review all privacy policies posted on any of these sites before providing them with information.

#### **ONLINE POLICY REGARDING CHILDREN**

We strive to maintain the privacy of the Internet for all visitors of our site, including children. This site is a public site. Regarding the above issue, the Portal is guided by the provisions of the Law of Ukraine "Model Law on Protection of Children from Information Harmful to Their Health and Development", which is available at: [https://zakon.rada.gov.ua/laws/show/997\\_m85](https://zakon.rada.gov.ua/laws/show/997_m85)

If you are a parent or guardian who finds that your child has submitted their personal information without your permission or consent, we will remove the information from our list upon your request. To request the removal of information regarding your child, please contact our Administration ([info@expert.education](mailto:info@expert.education)) and be sure to include in the message the same login information that was sent by your child.

#### **"DO NOT TRACK" REQUESTS**

Some web browsers have "Do Not Track" feature that alerts sites you visit to the fact that you do not want your online activity to be tracked. Each browser transmits "Do Not Track" signals to the website in different ways, interfering with the normal operation of the site to process each request. To avoid errors between browsers and the website, we do not currently respond to "Do Not Track" alerts. As technology and interactions between the browser and the website improve, we will review the ability to respond to "Do Not Track" alerts and add appropriate changes to our policies.

#### **INQUIRIES AND COMPLAINTS**

If you have any questions or complaints regarding the use of your PII, let us know. You can contact us at any time by sending us an email at [info@expert.education](mailto:info@expert.education), and we will do our best to resolve the issue and respond to you.

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Український Національний Портал  
Комплексної Дистанційної Освіти  
(УНПКДО) Expert Education  
<http://expert.education>

#### **CONTACT US**

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\* The update is valid from May 25, 2018 in order to comply with the EU General Data Protection Regulation (GDPR).