

# Privacy and Personal Data Processing Policy

## 1. Introduction

This Privacy Policy explains our obligations to protect your confidential information and the openness and transparency of our actions during its processing.

By using our services, you trust us with your information. We understand that this is a big responsibility, so we exert every effort to protect your data and give you the opportunity to manage it.

This Policy describes how we, MEEST Shopping Logistics s.r.o under the license agreement, collect and process data that you provide to us and/or that we receive or otherwise generate in connection with your use of the web pages through the site <https://meest.shopping/> (Platform/Website).

This Privacy Policy sets out how we collect, process, store and protect your information when:

- you use ‘our Website’ or
- we carry out any other activity that is part of the operation of this Website.

We collect and process several types of information for the various purposes described in this Privacy policy. At the same time, we take appropriate technical and organizational measures to ensure the security and protection of personal data in accordance with applicable law.

Please note that you may not be able to access the Platform in whole or in part without providing the required information.

## 2. Definition

In this Privacy Policy:

- ‘personal data’ means any information or set of data about an individual, which is identified or can be specifically identified (‘data subject’), directly or indirectly, in particular by reference to an identifier (such as a name, surname, identification number, location data) or one or more characteristics specific of the person;
- ‘data processing’ – any action or set of actions with regard to data, such as collection, registration, accumulation, storage, adaptation, modification, renewal, use, dissemination (distribution, implementation, transfer), depersonalization, destruction of data, in particular using information (automated) systems;
- ‘cookies’ – files with a small amount of text which are sent to the browser from our servers and stored on your device, necessary for certain functions of the Platform; these files help remember information about you, such as what language you want to use on the site;
- ‘controller’ is a private or legal entity which solely or together with others sets goals and ways of personal data processing; for the purpose of this Confidentiality Policy we are the controller of your personal data;
- ‘processor’ is a private or legal entity that processes personal data on behalf of the controller; we can use the services of such entities for more effective data processing.
- ‘consent’ – any freely given, specific, conscious, unambiguous, made by notification or confirmatory action indication of the data subject, by which he or she agrees to the processing of their data;

- ‘user’ – any individual who has registered an account or not, identified or not, who visits one or more pages of the Platform; this does not include automated processes such as parsers, bots, etc.

### **3. Consent**

By using the Platform, you fully agree with this Policy. We inform you about it when you first access the Platform and create an account.

### **4. Your rights**

You have different rights regarding your personal data. In particular, you have the right to:

- receive confirmation that we are processing your personal data and request copies of the personal data we have about you;
- require that we update the personal information we have about you or correct it if you believe such information is incorrect or incomplete;
- require the deletion of personal information we have about you or restrict the use of such information;
- not consent to our processing of your personal data.

To exercise any of your rights, or in the event of any questions regarding the use of your personal data, please contact us: [meest.shopping@meest.com](mailto:meest.shopping@meest.com)

### **5. The right to file a complaint**

If you are dissatisfied with the way we process your personal data or how we have responded to any request or requirement for confidentiality that you have submitted to us, you have the right to file a complaint to the EU Data Protection Supervising Authority in your country. If you would like to be referred to the Data Protection Supervising Authority, please contact us: [meest.shopping@meest.com](mailto:meest.shopping@meest.com).

### **6. Data types**

We want you to understand what kind of information we collect when you use our services.

When you visit the Platform, we may ask you to provide or automatically collect the following types of data:

- email address;
- name and surname;
- phone number;
- address, country, region, city, postal code;
- device geolocation, if you explicitly give us permission to do so (you can enable or disable location services when using the Platform at any time in the device settings);
- IP address;
- browser information;
- information about the device and operating system;
- cookies (sessions, benefits, security, advertising, etc.). Please note that some of the third-party services we use (such as Google Analytics) may place their own cookies in your browser; this policy does not apply to the use of cookies by third parties;
- history of actions on the Platform (pages visited, date and time, etc.);

- interactions on the Platform (bookmarks, etc.);
- content posted on the Platform (publications, comments, etc.).

### **7. Publicly available data**

If you are a registered user, you may, but are not required to, interact publicly on the Platform (by registering product/order data, comments, creating recipients, creating profiles, etc.), which may disclose certain personal information. This way you knowingly and openly publish these data. If you do not agree to this, do not create an account or use such functions of the Platform.

### **8. The purposes of data processing**

We collect and process personal data for the following purposes:

- to service and support the functions of the Platform;
- to recognize you and maintain a stable, consistent user experience across multiple sessions;
- to show you content and interact according to your interests and preferences, based on automatic decision making;
- to notify you of changes to the Platform;
- to allow you to use the interactive functions of the Platform;
- to monitor, analyze and improve the work of the Platform;
- to provide user support;
- to prevent and combat spam, fraud and abuse;
- to identify, prevent and solve technical problems;
- to fulfill our obligations and ensure the observance of our rights arising from the agreements concluded between you and us <https://meest.shopping/terms-and-conditions-en/>;
- to send you messages about your account;
- to send you news, special offers and information about other features that we offer, if you have not refused to receive such information;
- for any other purpose upon your consent.

### **9. Data retention**

We retain your data only for as long as is necessary to achieve the purposes set out in this Policy, to comply with our legal obligations (for example, if we are required to store certain data in accordance with applicable law and/or the Terms of Service) and to resolve disputes.

### **10. Data deletion**

Unless the current legislation requires for us to store certain data (for example, by lawful decision of a court or law enforcement agencies), you have the right to:

- call off your consent with this Policy or delete all your personal information by deleting your account at any time on its settings page.

If you delete your account:

- your personal data will be permanently deleted or encrypted;

- your public content will be either permanently deleted or impersonated;
- deleting all your data from our servers may take up to one week;
- Search engines may take extra time to de-index your data, depending on the policies of those search engines, which we do not control.

### **11. Data transfer**

Your data may be transferred and stored on computers located outside your country, region, or jurisdiction, where data protection laws may differ from the laws of your jurisdiction.

Our servers are hosted on the Amazon platform in the EU (AZ Ireland, AZ Frankfurt) and in the USA (AZ Virginia), where we process and store data. But we can also do this in any other jurisdiction in which we choose to work. In this case, no transfer of personal data will take place in the organization or country if there are no established or followed proper rules of personal data protection.

### **12. Data security**

We use encryption (HTTPS) to protect data transmitted to and from the Platform, our servers are also encrypted at rest, and we hash some credentials in databases.

We carry out administrative and technical control, which ensures the restriction of access to personal data on the principle of business necessity;

We carry out physical protection measures, such as staff access to our premises only with passes.

We conduct educational events and trainings for employees who have access to personal data, in order to raise their awareness of their obligations regarding confidentiality;

We regularly test, measure and evaluate the efficiency of our technical and organizational measures aimed at data security and protection.

In other cases, you are responsible for taking reasonable steps to protect the credentials required to log in to your account (such as disclosing passwords and personal information to third parties).

The security of your data is important to us but remember that no method of data transmission over the Internet or electronic data storage method is 100% secure.

Although security is one of our top priorities, and we take appropriate technical and organizational measures to ensure a high level of data protection, we cannot guarantee their absolute security.

### **13. Data disclosure**

We do not sell your data to third parties but we may disclose them in the following situations.

#### **Disclosure of information to law enforcement agencies**

Under certain circumstances, we may be obliged to disclose your personal information if required by applicable law or in response to lawful and reasonable requests from state authorities.

If we intend to share your personal information in litigation, we will let you know so that you can challenge it, unless it is prohibited by law or we believe that it may endanger others.

We will object to requests for your personal data that we believe are illegal or unreasonable.

### **14. Restructuring**

If we or our subsidiaries are involved in a merger, acquisition or sale of assets, your data may be transferred.

## **15. Service and support**

We may provide the minimum necessary personal data to third parties (with whom we cooperate and who offer at least the same level of data protection) to service and support the Platform:

- hosting, storage, and other infrastructure;
- analytics services (such as Google Analytics).

## **16. Other cases**

We may also disclose your information to:

- our affiliated companies;
- contractors, service providers and other third parties with whom we cooperate to support the Platform;
- to achieve the purpose for which you provide them;
- if we believe that disclosure is necessary to protect the rights, property or safety of our company, users or other persons;
- in any other cases upon your consent.

## **17. Service providers**

We may hire other legal entities and individuals to support the Platform and assist us in analyzing how it is used. Such persons may have access to your personal data only for the performance of these tasks on our behalf and are obliged not to disclose them.

Google Analytics

We use Google Analytics to monitor and analyze the use of the Platform. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. These data are transmitted to other Google services. Google may use the data collected to contextualize and personalize advertising for its own ad network.

For more information on the processing and protection of your data at Google, we recommend that you read the following documents:

- Google Privacy Policy <https://policies.google.com/privacy?hl=en>
- Data security in Google Analytics <https://support.google.com/analytics/answer/6004245>.

## **18. Documents and confidential information**

We understand that legal documents and templates that you upload to the Platform without public access to them may contain confidential information. Therefore, they are always sent in encrypted form, stored in encrypted form on our servers and never transmitted in decrypted form to third parties, except when we are obliged to disclose them in decrypted form by the decision of a court or law enforcement agencies in accordance with applicable law.

## **19. General Data Protection Rules (GDPR)**

If you are a resident of the European Union (EU) and European Economic Area (EEA), you have the rights to data protection according to GDPR (details on <https://eur-lex.europa.eu/eli/reg/2016/679/oj>).

For the purpose of GDPR, we are the controller of your personal data. We take reasonable measures to allow you to correct, change, delete or restrict the usage of your personal data.

If you want to receive information about what kind of your personal data we store or if you want them to be deleted from our systems, please write us to [meest.shopping@meest.com](mailto:meest.shopping@meest.com)

Under some circumstances you have the following rights to your data protection:

- right to access, update or removal of your personal data;
- right to correction of your personal data if these data are incorrect or incomplete;
- right to object to the processing by us of your personal data;
- right to demand the restriction of the process of your personal data;
- right to receive the copy of your personal data in the structured and widely-used format that can be easily read by the machine;
- right to withdraw your consent at any time when we refer to your consent to the processing of your personal data;
- right not to be subject to the decision that is based exclusively on the automated processing, including profiling;
- right to file complaints to the supervisory body regarding the collection and processing of your personal data; although Ukraine is not a member of the European Union, in Ukraine, you can file such complaints to the Ukrainian Parliament Commissioner for Human Rights (<http://www.ombudsman.gov.ua/>) or court according to the Law of Ukraine “On Protection of Personal Data” as of 20.03.2020 (<https://zakon.rada.gov.ua/laws/show/2297-17#Text>).

Please note that we can request you to confirm your identity before answering the requests related to the protection of your personal data.

## **20. Links to other sites**

The platform may contain links to other sites that we do not own. If you click on such a link, you will be redirected to a third party site.

We encourage you to review the privacy policies of each site you visit.

We do not control and are not responsible for the privacy policies or actions of any other sites or services.

## **21. Built-in content**

The platform may contain content built in by third parties (for example, Google reCAPTCHA, built-in pages from Facebook or videos from YouTube), which in some cases may also collect and process personal data. The collection and processing of personal data by built-in content providers is not governed by this Policy, but by the privacy policies of such providers.

## **22. Emails**

Sometimes we send emails and push notifications about the Platform account, policies or features. You cannot opt out of such emails until you delete your account. However, you can opt out of receiving non-administrative emails, such as newsletters and marketing mailouts, on your account settings page.

When you interact with an email sent by us (for example, open or follow a link in the email), we may receive information about such interaction.

We never send you emails asking you to provide an account login. If you receive such a message, do not reply, but send it to us so that we can investigate it.

## **23. Data protection of children**

The platform is not intended for persons under 18 years of age ('children').

We understand the importance of protecting children's private life. Our website and services are not intended for use by children, and they are not the target audience of our website or services. Our policy is not to intentionally collect or store information about children.

We do not intentionally collect children's personal data. If you are a parent or guardian and know that your child has provided us with personal information, please let us know.

#### **24. Changes to this Policy**

We may change and update this Policy unilaterally.

Changes to this Policy take effect when they are published on the Platform.

We will notify you of any material changes by email and/or noticeable message on the Platform prior to the publication of the updated Policy.

We encourage you to periodically review this Policy for changes.

#### **25. Contact details**

If you have any questions about this Policy or the processing of your personal data, please send us an email at [meest.shopping@meest.com](mailto:meest.shopping@meest.com)