

## POLICY ON PROCESSING PERSONAL DATA AND COOKIES

Company (**We, Us**) respects and values your (**User, You**) privacy and makes every effort to ensure the security of your Personal Data (*as defined below*).

In this Personal Data and Cookie Policy (the **Policy**) We provide information about the scope of the Personal Data we collect, explain the reasons for collecting it and how it is used, and identify the third parties to whom your data is shared.

This Policy is part of the **SMS Widget Public Offer (<https://pva-widget.com>)**. Please read this Policy carefully and contact us in case you have any questions.

### TERMS AND DEFINITIONS

In the event that any word used in the text of the Policy begins with a capital letter, it shall be understood and construed as provided in this section.

1)	<b>SMS widget</b>	A web widget operated by the Company and embedded on the Company's partner websites.
2)	<b>We, Our, Ours and Company</b>	Kinelija, UAB Registration code: 303336386 Kirtimu-51, Vilnius, Lithuania, LT-02244 Email: pva.widget.com@gmail.com
3)	<b>You, the User</b>	A person who meets all the requirements specified in the Agreement and who has made an Offer Acceptance in order to receive Services from the Company using SMS Widget.
4)	<b>Offer</b>	SMS widget public offer, available at: <a href="https://pva-widget.com/offer">https://pva-widget.com/offer</a>
5)	<b>Personal data</b>	Means any information relating to an identified or identifiable person that Users provide to Us during Registration, information that WE automatically collect about Users, information that Users provide to Us under the terms of the Offer and the provision of feedback, and information about Users that We receive from third parties.
6)	<b>Processing of Personal Data</b>	means a broad range of operations performed on Personal Data, including by manual or automated means of collecting, recording, organizing, structuring, storing, adapting or modifying, retrieving, consulting, using, disclosing by transmission, disseminating or otherwise making available, matching or combining, restricting, deleting or destroying Personal Data.

In the event that any terms are used in this document that have not been defined above or in the remainder of the document, such terms should be understood as interpreted in the Offer, applicable laws and regulations and only as a last resort in accordance with generally accepted practice.

### ADOPTION OF THIS POLICY

If you agree to all and any provisions of the Policy, you may accept them by clicking "Next" on the first (start) screen of the SMS Widget.

If at any time you do not agree with any provision of this Policy, you must immediately stop using the SMS Widget.

### What Personal Data do we collect?

In order to provide You with access to the SMS Widget and the Services, We will ask You to provide Us with some important information about Yourself.

During Your use of the SMS Widget and Services, We may collect the following types of Personal Data:

№	Type	Personal data
1.	<b>Communication data</b>	<ul style="list-style-type: none"> <li><input type="checkbox"/> e-mail address.</li> </ul>
2.	<b>Registration data</b>	<p>In case you use the SMS widget personally:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Email address.</li> </ul>
3.	<b>Automatically collected data</b>	<p>Technical Information:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Internet Protocol (IP) address;</li> <li><input type="checkbox"/> browser type and version;</li> <li><input type="checkbox"/> time zone setting;</li> <li><input type="checkbox"/> browser plug-in types and versions;</li> <li><input type="checkbox"/> operating system and platform.</li> </ul> <p>Usage data:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> products that the User has viewed or searched for;</li> <li><input type="checkbox"/> page response time;</li> <li><input type="checkbox"/> download errors;</li> <li><input type="checkbox"/> time to visit certain pages;</li> <li><input type="checkbox"/> displacement data;</li> <li><input type="checkbox"/> methods used to navigate away from the page;</li> <li><input type="checkbox"/> other data collected through cookies and similar technologies.</li> </ul>

We are constantly developing the SMS Widget and may add new features and Services, for which We may ask You to provide additional information to gain access.

You provide Us with any Personal Data on a voluntary basis. In the event of your refusal, We cannot guarantee the effective provision of the Services and access to the SMS widget and reserve the right to restrict your access to the SMS widget and the Services.

### What are the purposes of collecting Personal Data?

We collect your Personal Data for the following purposes:

№	Personal data	Purpose of the Gathering
1.	<b>Communication data</b>	<ul style="list-style-type: none"> <li>☐ providing you with feedback;</li> <li>☐ administrative liaison;</li> <li>☐ notification of other products and services that you may be interested in.</li> </ul>
2.	<b>Registration data</b>	<ul style="list-style-type: none"> <li>☐ providing access to the SMS widget and the Services;</li> <li>☐ ensuring network and information security;</li> <li>☐ providing a service connection.</li> </ul>
3.	<b>Automatically collected data</b>	<ul style="list-style-type: none"> <li>☐ ensuring network and information security;</li> <li>☐ ensuring normal functioning of the SMS widget;</li> <li>☐ improvement of SMS widget operation;</li> <li>☐ identification of errors and weaknesses and development of SMS widget.</li> </ul>

We will only collect and use your Personal Data for the purposes set out above, unless the collection and use of Personal Data is necessary for other purposes that are compatible with the original purpose for which the Personal Data was collected or is required by applicable laws or judicial/enforcement acts. If We need to use your Personal Data for other purposes not mentioned above, We will notify You and explain the legal basis for such collection.

### How do We collect your Personal Data?

We may collect Users' Personal Information in a variety of ways:

№	Personal data	Method of collection
1.	<b>Communication data</b>	We access such Personal Data when you contact us with any questions prior to using Our Services, for feedback, or for any other purpose (e.g., email).

2.	<b>Registration data</b>	You provide Us with this Personal Data when You complete and submit the relevant forms on the SMS widget.
3.	<b>Automatically collected data</b>	We collect this data in the course of your interaction with SMS widget using cookies, server logs and other similar technologies.

**How long do We keep your Personal Data for?**

We will retain your Personal Data for no longer than is necessary to fulfill the purpose of collecting and processing it.

We generally store and delete your Personal Data in the following ways:

<b>№</b>	<b>Personal data</b>	<b>Shelf life</b>
1.	<b>Communication data</b>	Until we provide you with feedback.
2.	<b>Registration data</b>	Throughout the lifetime of your Personal Account.
3.	<b>Automatically collected data</b>	Throughout the term of your Personal Account.

Personal Data collected pursuant to our legal obligations under financial or anti-money laundering laws or other laws may be retained **after deletion of the Personal Account for as long as required by such laws.**

Please note that We may retain Your Personal Data for longer periods if required by applicable laws and regulations. We retain certain Personal Data after deleting a Personal Account for the purposes of fraud prevention, to enable us to prosecute individuals who attempt to commit fraud, and to comply with Our legal obligations.

**What are the legal grounds for Processing Personal Data?**

Personal Data is processed in accordance with the rights and privacy rules under the Regulation of the European Parliament and of the Council of the European Union on the protection of individuals with regard to the processing of personal data and on the free circulation of such data (General Data Protection Regulation/General Data Protection Regulation/GDPR) and Our local rules.

Where the regulations of your country of residence provide stricter standards for the processing of Personal Data, your Personal Data will be processed in accordance with those standards.

In general, the legal grounds for processing Personal Data may be listed as follows:

**Your Consent.** As You have given Us consent to process Personal Data for certain purposes, the lawfulness of such processing is based on Your consent. Giving Us consent to the processing of Your Personal Data is voluntary. Any consent given may be withdrawn at any time. Please note that revocation is only valid for a future time. Withdrawal does not affect the processing of Personal Data that took place prior to the withdrawal.

**Contractual Performance.** Refers to the processing of Personal Data where it is necessary for the performance of contractual obligations under a contract to which you are a party or to act on your request prior to entering into such a contract. The latter includes the Offer.

**Our Legitimate Interest.** Means our interest in managing our business processes in a proper and responsible manner, protecting our reputation and providing you with an appropriate level of Service delivery.

**Legal Compliance.** We process your Personal Data where necessary to comply with legal or regulatory obligations.

### **Do We share your Personal Data with third parties?**

We sometimes need to share the Personal Data we process with third parties. Please see below for a limited list of third parties to whom We may share your Personal Data:

1. Business Partners, suppliers and subcontractors involved in the process of providing the Services.

We require all affiliates to respect the security of your Personal Data and treat it in accordance with the law. We do not allow them to use your Personal Data for their own purposes and only allow them to process your Personal Data for specific purposes and in accordance with our documented instructions.

Please note that Third Party Service Providers do not fall under the criteria of affiliates. We do not share your Personal Data with them.

2. Courts and/or government agencies and/or law enforcement officials when required by laws and regulations.

We will only use and share your Personal Data with these parties where it is necessary for the lawful conduct of our business activities.

3. Analytics and search engine providers that assist the Company in improving and optimizing the SMS widget.

We can assure you that We will not sell, trade or share your Personal Data with third parties without your explicit consent.

### **Do We transfer your Personal Data abroad?**

We store your Personal Data **primarily in Germany**. If you are a citizen of the Russian Federation, we store your data in the Russian Federation. However, to facilitate our global operations, Our Company may utilize the services of foreign data processing service providers, unless the laws and regulations of your jurisdiction restrict such data transfer.

We hereby assure you that We will only transfer your Personal Data to countries that, in the opinion of the European Commission, provide an adequate level of protection for Personal Data. We will use our best efforts to ensure that Your Personal Data is protected in accordance with this Privacy Policy wherever Your Personal Data is processed and will take appropriate contractual or other steps to protect the relevant Personal Data in accordance with applicable law.

If such service providers are not established in a country that provides an adequate level of protection within the meaning of Regulation (EU) 2016/679, such as the United States, data transfers will be covered by standard data protection provisions adopted by the European Commission or another appropriate protection mechanism such as the Privacy Shield Framework.

### **How do We protect your Personal Data?**

We have implemented a number of technical, organizational and administrative measures to ensure the confidentiality, integrity and privacy of your Personal Data and to protect your Personal Data from loss, theft, unauthorized access, misuse, alteration or destruction, which generally apply to the protection of Personal Data in our possession.

These measures include, but are not limited to, the implementation of state-of-the-art security technologies: Secure Sockets Layered (SSL) technology to ensure encryption and secure transmission of your Personal Data over the Internet, the application of secure coding principles to your Personal Data, and regular penetration testing.

We also use encryption (HTTPS/TLS) to protect data transmitted to and from the SMS widget. Transport Layer Security (TLS) is a protocol that ensures the confidentiality and integrity of data between two communicating applications. It is the most widely used security protocol in use today and is used for web browsers and other applications that require secure communication over a network, such as file transfers, VPN connections, instant messaging, and voice over IP.

Only authorized Company personnel have access to Personal Data, and such personnel are required to treat Personal Data as confidential. The security measures in place will be reviewed from time to time in accordance with legal and technical developments.

### **Your rights**

Your basic rights as a data subject of personal data include the following:

1. **Right to access Personal Data.** You may ask Us to provide You with a copy of Your Personal Data to which We have access. We will provide You with such information within a reasonable time and may require You to reimburse Us for the costs associated with collecting the information from the system.
2. **Right to amend Personal Data.** You may request that we amend or update any of your Personal Data. You may do so through the relevant features of the SMS widget or by contacting us directly. The Company reserves the right to refuse personal assistance if correction of Personal Data is available in the SMS Widget.

3. **Right to erasure of Personal Data.** You may ask Us to delete Your Personal Data in accordance with applicable law. Please note that in some cases the SMS widget will automatically delete Your Personal Data when a Personal Account is deleted. However, in any case, if a Personal Account is deleted, We will not use Your Personal Data for any further purpose and will not share it with third parties, except as required by law. Please note that We may not always be able to comply with your deletion request due to legal requirements, of which You will be notified, in response to Your request.
4. **Right to withdraw consent.** To the extent that the processing of your Personal Data is based solely on your consent, you may withdraw your consent at any time. This will not affect the lawfulness of any processing that was carried out prior to the withdrawal of consent. Please note that any Personal Data whose basis for processing is other than your consent will continue to be processed.
5. **Right to restrict processing.** In some jurisdictions, applicable law may give You the right to restrict or object to Our processing or transfer of Your Personal Data in certain circumstances. We may continue to Process Personal Data if it is necessary to do so to protect our rights or in any other cases required by applicable law.

Please note that none of the above rights are absolute, which means that they generally have to be weighed against our own legal obligations and legitimate interests. If a decision is made to reject your request, We will inform you of this together with the reasons for our decision.

## COOKIES

### ***What are 'cookies'?***

A **cookie** is a small text file that may be stored on your device when you visit websites. This text file stores certain information, such as the language selection of a website. When you visit a website again, this cookie is sent to the website. In this way, the website recognizes your browser and can, for example, store your language preferences.

Cookies usually have an "expiration date" which indicates how long they are stored on your device. For example, some cookies are automatically deleted when you close your browser (called session cookies), while others remain on your device for longer periods of time, sometimes until you manually delete them - we call them persistent cookies.

Except as set forth in this Policy, the cookies we use are necessary for the functionality and performance of the Site, for example, by making the Site more efficient and making it easier for you to use the functionality and services provided; these functional and/or performance cookies will be deleted from your device when your browser session ends (session cookies). We will not use the information stored in mandatory Cookies for any purpose other than as absolutely necessary to provide you with the requested Services and functionality.

When you first access the Site, We invite you to read and accept the Policy. In doing so, **we may ask you to choose whether you agree to the processing of cookies (except for essential cookies, without which the normal operation of the Site is not possible, you may refuse to process cookies) and to confirm your acceptance of the Policy.**

By continuing to use the Site, you consent to the placement of cookies on your browser and device in accordance with this Policy.

Tracking technologies (e.g. cookies) can be **permanent** (i.e. they remain on your computer until you delete them) or **temporary** (i.e. they remain until you close your browser).

Some of the cookies we use are listed below. This list is not exhaustive, but gives you an idea of the main uses of cookies. When you visit the Site, the cookies described below may be installed on your device.

No	Cookie file	Assignment	Shelf life
1)	PHPSESSID	Session token, to save the user's session	session

We may use both persistent and session cookies, and variations thereof, to operate the Site:

**Mandatory Cookies** - are necessary for the proper functioning of the Site.

**Analytics and Performance Cookies** - allow you to track their transitions to the Site.

Cookies may be used to create statistics that help us understand exactly how visitors use the Site.

## **ENABLING AND DISABLING COOKIES AND SIMILAR FUNCTIONS**

You have the option to accept or reject all cookies on all sites you visit by changing the settings in your Internet browser. For example, when you are using Internet Explorer version 11.0 you should do the following:

- 1) select "Settings", then "Browser Properties";
- 2) Click on the Privacy tab;
- 3) using the mouse, select your preferred settings.

You must use different settings for each browser to modify and delete cookies. Please note that certain functionality of the Site may not be available if you disable cookies. To learn more about how to adjust or change your browser's settings, please refer to your browser's instructions or visit [www.aboutcookies.org](http://www.aboutcookies.org) (available in English) or [allaboutcookies.org](http://allaboutcookies.org) (available in English, Spanish, German French).

If you use different devices to access the Site (e.g. smartphone, tablet, computer, etc.), you should ensure that each browser on each device is configured according to your cookie preferences.

## **LINKS TO OTHER WEBSITES**

The SMS Widget may contain links to external websites/platforms maintained by Third Party Service Providers whose Personal Information and privacy practices differ from Ours.

The Company is not responsible for the Personal Information or privacy practices used by such third parties. We strongly encourage you to review the privacy policies of all third-party websites before using such websites or submitting any Personal Data or any other information on or through such websites.



## **POLICY CHANGE**

The Company hereby reserves the right, at its sole discretion and at any time, to amend this Policy by publishing the amended version in the SMS widget.

The User undertakes, at his/her own risk, to continuously check for changes to the Policy and perform the following actions: (i) memorize/mark the date of the last update specified in the Policy (e.g., keep a copy of the Policy, etc.) at the time of initial registration of the Personal Account and at any time after the changes are made, (ii) regularly visit the relevant page of the Website/Application section and study the document in case the update date changes.

If you do not agree with any changes to the Policy, you must immediately stop using the SMS Widget.

## **CONTACT US**

If there is anything left unclear in the text of this Policy, we will be happy to clarify its provisions.

You may also use the contact information provided in this section for any reason under this Policy.

For questions regarding this Policy, please contact us at **[pva.widget.com@gmail.com](mailto:pva.widget.com@gmail.com)**.