

Terms of Use and Website Privacy Policy

Epasero.com is owned and operated by Epasero Group Ltd a company incorporated in Cyprus. Epasero Group refers collectively to Epasero Group Ltd and its subsidiaries, affiliates and related companies (the 'Websites').

Epasero Group maintains the Websites as a service to its visitors, subject to the following privacy policies ('Privacy Policy') and terms and conditions concerning the use of the Site ('Terms of Use').

When you use the Site, you accept the 'Terms of Use' and our 'Privacy Policy'; if you do not agree to the 'Terms of Use' and/or our 'Privacy Policy' outlined in this document you may not use the Site.

Epasero Group reserves the right to modify content on its Websites, 'Terms of Use' and 'Privacy Policy' periodically without prior notice. It is User's responsibility to read our 'Terms Of Use' and 'Privacy Policy' and decide if they will agree to them and use our websites.

We keep our privacy notice under regular review in order to ensure that it is in line with any changes to applicable laws and regulations, including the GDPR.

You have the right to make a complaint at any time to the Commissioner for Personal Data ("CPD"), the supervisory authority for personal data protection issues in Cyprus.

Website cookies

The website uses cookies. small text files that are placed on your computer that store certain limited information about you. The cookies we use do not enable any website visitor to be individually identified and will only be used for website analytics purposes.

In addition, the coding language the website is written in uses session cookies. These are deleted each time you close your browser. These cookies do not store any information about the visitor once the browser is closed.

For more information about cookies, we recommend that you visit www.allaboutcookies.org

If you wish to delete cookies, you can change your browser settings to reject cookies. As the means by which you can do this varies from browser to browser, please visit your web browser's "Help" menu for further details. Please note that, should you choose to refuse cookies, this might impair some of the functionality of the website.

Links to Other Websites

The Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies.

Data Collected

Personal data means any information about an individual from which that person can be identified. It does not include anonymised data. We may collect, use, store and transfer different kinds of personal data (“**Personal Data**”) such as Identity Data (name, surname), Contract Details, contents of any messages, Technical Data (e.g. including internet protocol (IP) address, browser type and version, time zone setting and location) and Usage Data (includes information about use of the Website).

We also collect, use and share Aggregated Data such as statistical or demographic data which does not directly or indirectly reveal a person’s identity. If we combine or connect Aggregated Data with other information so that it can directly or indirectly identify you, we treat the combined data as Personal Data and as per this policy.

We do not collect any Special Categories of Personal Data about you, nor do we collect any information about criminal convictions and offences.

Collection of Personal Data

We may collect Personal Data when you use the Website and when you contact us through the Website, in particular:

- Direct interactions if you fill in forms on the Website or by contacting us.
- Automated technologies or interactions. We may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our Cookies Policy for further details.
- Third parties or publicly available sources. We may collect Personal Data from various third parties, including technical data from analytics providers such as Google.

Use of Personal Data

We use Personal Data only on the basis of and as permitted by applicable legislation and as necessary for our legitimate interests of running our business, provision of administration and IT services, network security, to prevent fraud, to define types of website visitors, to keep our website updated and relevant, to develop our business and to inform our marketing strategy and order to handle all requests, enquiries and complaints.

We will only use Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. You may contact us to receive more information on

how the processing of any Personal Data is compatible with the original purpose for which it was collected.

In general, we use information that we collect about you or that you provide to us, including Personal Information and Sensitive Personal Information, for following purposes:

- **Provision of services:** to provide you with information, products or services that you request from us;
- **Customer management:** to manage your account, to provide you with customer support and with notices about your account, including notices, notices about changes to any products or services we offer or provide through it;
- **Advertising:** following explicit consent to communicate with you about products or services that may be of interest to you either from us, our affiliates or other third parties;
- **Functionality and security:** to detect, prevent, and respond to actual or potential fraud, illegal activities, or intellectual property infringement;
- **Compliance:** to enforce our terms and conditions and to comply with our legal obligations as these derive from the applicable laws or our regulators;

in any other way we may describe when you provide the information; or for any other purpose with your consent provided separately from this privacy policy.

Disclosure of Your Personal Information

We want you to understand when and to whom we disclose Personal Information and other information we have collected about you or your activities on the Website. We do not share your Personal Information with third parties except as indicated below:

- **Affiliates.** We share above categories of Personal Information with our subsidiaries and affiliates to the extent this is necessary for the purposes of provision of services, customer management, customization of content, advertising (if you have consented) and security, and compliance, or to the extent you have provided your consent provided separately from this privacy policy.
- **Service providers.** To our authorized service providers that perform certain services on our behalf, including for purposes of provision of the services you requested from us, customer management and security. These services may include fulfilling orders, processing credit card payments, risk and fraud detection and mitigation, providing customer service and marketing assistance. These

service providers may have access to Personal Information needed to perform their functions but are not permitted to share or use such information for any other purposes. We have taken all reasonable steps to ensure that they comply with the current data protection regulations.

- **Legal successors.** To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by is among the assets transferred. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy policy.
- **Other.** To the extent this is necessary to fulfill any other purpose not mentioned above for which you provided Personal Information and, if applicable, your consent separately from this privacy policy.

We also disclose your Personal Information to other third parties, including official authorities, courts, or other public bodies:

- In response to a subpoena or similar investigative demand, a court order or other judicial or administrative order, or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; to comply with applicable law or cooperate with law enforcement, government or regulatory agencies; or to enforce our Website terms and conditions or other agreements or policies; or as otherwise required by law (including responding to any government or regulatory request). In such cases, we may raise or waive any legal objection or right available to us, in our sole discretion.
- To the extent a disclosure is necessary in connection with efforts to investigate, prevent, report or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees, or others; to maintain and protect the security and integrity of our Website or infrastructure.

Third parties to whom we may disclose Personal Information may have their own privacy policies which describe how they use and protect Personal Information. If you want to learn more about their privacy practices, we encourage you to visit the websites of those third parties.

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction. In particular, we may transfer non-Personal Information and process it outside your country of residence, wherever the Website, its affiliates and service providers operate. We may combine non-Personal Information we collect with additional non-Personal Information collected from other sources. We also may share aggregated information with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis.

Disclosures to Third Parties & International Transfers

We may share Personal Data with third-party service providers, acting as processors, based in Cyprus, who provide IT and system administration services for the purposes set out above.

We require all third parties to respect the security of any Personal Data disclosed, to treat it in accordance with applicable legislation and to process for specified purposes and in accordance with our instructions.

Security

We have put in place appropriate security measures to prevent Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to any Personal Data only to individuals and person who need to know. They may only process any Personal Data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

We will only retain Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In some circumstances, we will anonymise Personal Data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your Legal Rights

Under certain circumstances, you have certain rights under applicable legislation as regards your Personal Data.

- Right to withdraw consent: You have the right to request access to your Personal Data.

- Request to correct Personal Data: You may request that we correct any incomplete or inaccurate data we hold about you.
- Request to erase Personal Data: You may request that we delete or remove any Personal Data where there is no good legal reason for us continuing to process it. We may not always be able to comply with your request on the basis of legal reasons that will be notified to you at the relevant time.
- Object to processing of Personal Data: Where there is something about your particular situation which makes you want to object to processing because it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request Restriction of Processing: This enables you to ask us to suspend the processing of your personal data if you want us to establish the data's accuracy or where the use of such data is unlawful but you do not want us to erase it or where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of Personal Data: You may request that we provide you, or a third party of your choice, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

We do not normally charge any fees for access to any Personal Data (or to exercise any of the above rights). We may charge a reasonable fee if a request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with a request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We try to respond to all legitimate requests within one month. It may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

No Error Free Performance

We do not warrant, undertake and/or represent error-free performance under this Privacy Policy. We will use all reasonable efforts to comply with this Privacy Policy and shall take immediate rectification actions in the event of a breach of this Privacy Policy. We shall not be liable for any incidental, consequential or punitive damages relating to a breach of this Privacy Policy.