

Privacy Policy



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1. Introduction.

1.1 DEBOURSE.COM ("we") are committed to protecting the privacy of our data subjects ("you" or "user"); in this policy we explain how your personal data, that is, any information relating to you as an identified or identifiable individual that we may store about you, is collected, used, stored, disclosed and deleted (all of which are referred to as "processing").

1.2 We do not collect personal information from individuals under the age of 18. If you believe that an individual under the age of 18 has provided us with personal information, please contact our support team.

1.3 This policy applies only to information that we process. It does not apply to the practices of companies that we do not own or control or employees that we do not manage. Information about our services may contain links to third party websites, and any information you provide to these sites will be covered by any privacy policy they may have. Please refer to the privacy policy of the third party sites you visit. These sites are responsible for protecting any information you provide them with, so we cannot be responsible for their misuse of your personal information.

1.4 We may update this policy from time to time and notify you of changes in this policy affecting your rights by email and/or posting on our website at DEBOURSE.COM/docs/privacy.pdf.

2. Your personal data and how we use it.

2.1 We regulate this section:

- general data categories and types of personal data we may process;
- source of personal data;
- the purposes for which we may process personal data; and
- legal basics of processing.

2.2 We may process your registration data ("registration data"). The registration data may include your user name and e-mail address. The source of your registration data is you. The registration data is necessary to enable you to use the service. The legal basis for such processing is the consent and performance of the contract between you and us and/or taking steps to enter into such a contract, upon your request;

2.3 We may process your account details ("Account Details"). Account Details may include your full name, email address, user name, country and telephone number. Only you are the source of your account information. Account information may be processed in order to provide our services, to ensure the security of our users and services, and to contact you. Users may be required to provide their full name in their user profile before purchasing our products. Full name verification helps protect users from fraudulent payments, enhances user security and provides an alternative way to access your account at <http://debourse.com> in case your password is lost or your account is compromised. The phone number is used for notification purposes and provides an alternative mechanism to identify users in the event that a password is lost or an account is compromised. The legal basis for such processing is consent; performance of the contract between you and us and/or acting upon your request to enter into such contract; and our legitimate interests, namely, the operation of our business model.

2.4 For your safety, you provide us with your identification details which may include your full name, country, date of birth, passport number, social security number and gender. The purpose of providing identification information is to protect our users from fraud and helps us prevent, detect and investigate fraud, money laundering, criminal activity or other misuse of our service. In addition, by requiring identification data from all users, we will be able to provide a more secure and secure trading experience for our users. Providing identification information is a guarantee that we will be able to regain access to your account in case of hacking. The legitimate basis for such processing is the consent and legitimate interests of our and/or third parties, namely to prevent, detect and investigate fraud, criminal activity or other misuse of the service and to prevent security issues.

2.5 We may process data about your use of our website and services ("usage data"). Use data is primarily non-personally identifiable information that web browsers, servers and services such as Google Analytics typically provide, such as browser type, language preferences, referring data

and the time of each visit. Other non-personally identifiable information that we may have access to includes how you use the service (e.g. search queries), your approximate location, the cookies set by our site, etc. Use data may include: 1) data that we collect primarily for behavioral statistics, business intelligence, and email campaigns ("analytic data"). We collect data about website traffic using Google Analytics. This data may also include your e-mail address, IP address and country code. 2) Data that we collect primarily for technical, security and/or fraud prevention reasons or to track errors ("technical data"). We also record certain events from your activities on our website. The legal basis for such processing is our legal interests and/or those of third parties, namely to monitor the quality of our services and improve our website and services, and to prevent, detect and investigate fraud, criminal activity or other misuse of the services and to prevent security problems.

2.6 We may process data relating to your Transactions that you carry out through our website ("Transaction Data"). Trade Data may include payment method, buyer's name, transaction value (in products), product value, Currency, trading hours and chat rooms. The source of your trading data is you and your account. The legal basis for such processing is consent; performance of the contract between you and us and/or taking steps, if you wish, to enter into such contract and our legal interests, namely the operation of our business model.

2.7 We may process information contained in or relating to any communication you send us or create through our service ("Communication Data"). Communication Data includes all your communications, inquiries and other communications with our customer service that may occur in the course of a dispute resolution or through our customer service, e-mail or any other means of communication. Communication data may include e-mail address, user name, IP address, full name, audio and video files, as well as in case of manual verification of the identifier: photo of the user's personal identifier, photo of the user and photo of the user's service bill or related document. Communication data may be processed in order to communicate with you, keep records, handle and resolve disputes, better serve our customers and improve our service. The legal basis for such processing is our legitimate interest, namely the proper administration of our website and business.

2.8 We may process information that you provide to us to subscribe to email, SMS and/or newsletters ("Date of Notice"). These notices may include your email address, telephone number, user name and full name. These notices may be processed in order to send you relevant notices and/or newsletters. The legal basis for such processing is consent. You may unsubscribe at any time by contacting us or clicking on the unsubscribe link in the email.

2.9 In connection with the activities described above, we may conduct profiling based on your interactions and the content you provide to our service and/or information obtained from external services (as described in section 3). In limited circumstances, automated processes may restrict or suspend access to our service if such processes detect activities that we believe pose a security risk or other risks to our service, our users or third parties. We process this information in light of our legitimate interests in protecting our service and brand; preventing, detecting and investigating fraud, criminal activity or other misuse of the service; optimizing the products and services offered and/or complying with applicable laws.

2.10 We may process your personal data when it is necessary to do so in order to establish, enforce or defend legal requirements, whether in court or out of court. The legal basis for such processing is our legitimate interest, namely, to protect and defend our legal rights, your legal rights and those of others.

2.11. In addition to the specific purposes for which we may process your personal data as set out in section 2, we may also process personal data when such processing is necessary to comply with a duty under law or to protect our vital interests or those of another individual.

2.12. All of the above general categories of data may contain data that does not identify you by itself and therefore are not considered personal data.

2.13. Please try to avoid providing us with unnecessary personal data.

3. Providing your personal data to others.

3.1. We regulate the following in this section:

- External services ("processors") that we use to process personal data on our behalf;

* The types of personal data that processors may process;

* The reason why they are used.

3.2 We use the services of Google (Google Analytics Ltd.), a company based in the United States, to analyze behavior, business intelligence and mailings. The data that we may provide to Google

Analytics may include your IP address, and this data is used by Google Analytics to create information about your use of our service.

3.3. We use the beget.com service to track server errors.

located in the Russian Federation. Error messages may include your IP address. beget.com is used to monitor and correct errors and failures.

3.4 In addition to the above in section 3, we may also disclose your personal information 1) to our auditors, lawyers, accountants, consultants and other professional advisors as it is necessary to obtain professional advice or to manage legal disputes and risks; 2) when disclosure of such information is necessary to comply with a statutory duty or to protect our vital interests and/or those of third parties.

4. 4. Transfer of your personal data to third parties and the risks involved.

4.1 We store your information primarily within the European Economic Area. However, some of the functions and requirements of the service involve the transfer of your information to third party service providers outside the European Economic Area. We have described all of these service providers in section 3 above. Gardarica and its successor company do not and cannot be held responsible for the disclosure of personal information about users by the companies listed above or by companies with whom we will cooperate in the future.

5. Saving and deleting personal data

5.1 This section 5 sets out our data retention and removal policies to help us comply with our legal obligations to remove personal data.

5.2 The personal data that we process for any purpose will not be held for longer than is necessary for the purposes indicated in the Gardarica documentation and/or on our website.

5.3 Users may request to delete their account through our website.

5.4 We will store and delete your personal data as follows:

- For all users who have deleted their account:

- Personal data will be deleted 14 days after deleting your account.

- Notification data are not normally stored by our processors, but they can store activity logs for a short period of time (this time varies from processor to processor, but does not exceed 13 months).

- For users who have not entered into or initiated any transactions or transactions with our products in their purse, we will delete all personal information 14 days after we approve your account deletion request.

- For users who have made or initiated any transactions or sent or received any transactions of our products using their purse and whose account deletion request has been approved by us, our deletion policy is as follows:

- your public profile will be hidden 14 days after deleting your account.

- your communication data will be deleted 5 years after your account has been deleted.

Messages will be deleted 180 days after the transaction is completed.

- Your registration, account details, identification, trading and technical data will be deleted 5 years after deleting your account.

- Transactions of our products from our internal systems will be deleted 5 years after your account has been deleted, except for publicly available information on exchanges related to our products.

5.5 In some cases, we may not be able to specify in advance the period for which your personal data will be held. In such cases, we will determine the retention period based on the period required to access the data for the purpose of providing the service, receiving payment or other matters, or for any other audit or legal reasons.

5.6 Notwithstanding the other provisions of this section 5, we may retain your personal data where such retention is necessary to comply with legal obligations we have or to protect your vital interests or those of another individual.

6. Your rights.

6.1. Your basic rights under this contract are as follows:

a) right of access;

You have the right to confirm whether we process your personal data and, where we do so, to access your personal data. If the rights and freedoms of others are not affected, we will provide you with a copy of your personal data. The first copy is provided free of charge, but a reasonable

fee may be charged for additional copies. You can request your personal data by contacting our support team.

b) the right to have it corrected;

You have the right to have any inaccurate personal data about you corrected and, for the purpose of processing, to fill in any incomplete personal data about you.

c) the right to delete;

you have the right to have your personal data deleted. We have described our policy on storage and deletion of personal data in section 5 above.

(d) The right to object to the processing;

you have the right to object to the processing of your personal data on the grounds related to your particular situation, but only if the legal grounds for the processing, that the processing is necessary to carry out a task in the public interest or in the exercise of any official authority vested in us; or for a purpose legitimate interest pursued by us or a third party. If you raise such an objection, we will cease processing personal data unless we are able to demonstrate a compelling legal basis for processing that exceeds your interests, rights and freedoms or processing to establish, exercise or defend a legitimate claim.

e) the right to data transferability;

Insofar as the legitimate reason for processing your personal data is consent and such processing is carried out by automated means, you are entitled to receive your personal data from us in a structured, widely used and machine-readable format. However, this right does not apply where it may negatively affect the rights and freedoms of others.

(f) The right to file a complaint with a supervisory authority;

If you believe that the processing of your personal data violates your rights, you have the legal right to file a complaint with the supervisory authority responsible for data protection. You may do so in the State where you live or where you work or where the alleged violation occurs.

(g) the right to withdraw your consent.

To the extent that your consent is a legitimate basis for processing your personal information, you have the right to withdraw that consent at any time. Withdrawal of funds will not affect the legality of data processing prior to withdrawal.

6.2 Without prejudice to the foregoing, if we have reasonable doubts as to the identity of a User exercising the rights referred to in section 6.1, or if we otherwise consider it necessary for security reasons, we may request additional information and otherwise use all reasonable measures necessary to verify the identity of the User.

6.3 You may exercise any of your rights in relation to your personal data by contacting our support team. With respect to the "right to delete", users may also request to delete their account through our website.

7. Policy for Using Cookies.

(a) what are cookies

As is customary almost everywhere, this site uses cookies, which are tiny files that are stored in your web browser to indicate your preferences and enable certain features such as authentication. This page describes what information they collect, how we use it and why we sometimes need to store these cookies. We will also explain how you can prevent these cookies from being stored, but this may reduce or "cause functionality problems" for some parts of the sites.

Files can be either "persistent" cookies or "session" cookies: persistent cookies are stored by the web browser and are valid for the periods set by it, unless deleted by the user before the expiration of the period; session cookies, on the other hand, expire at the end of the session of the user, when you close your browser.

Cookies generally do not contain any information that personally identifies you, but the personal information that we store about you may be linked to information stored in and from cookies.

For more general information about cookies, you can view them from publicly available sources.

(b) The cookies that we use

If you create an account with us, we will use cookies to manage your registration process, general administration and prevent misuse and misuse of our services.

We use cookies when you are logged in so that we can remember this fact. This prevents you from having to login every time you visit a new page. These cookies are usually deleted or deleted when you log out to allow access only to limited features and areas when you login.

When you submit data via a form, such as contact pages or comment forms, cookies may be set to remember your user data for future correspondence. In order to provide you with a more user-friendly experience on this site, we track your preferences when you use the site. In order to

remember your preferences, we must set cookies so that this information can be triggered whenever you interact with a page which is affected by your preferences.

We launch a partner program and as part of this program, partners advertise our website and services. As part of the affiliate program, we use cookies to track users who visit our site through one of our affiliate sites in order to properly fulfil their obligations to the affiliates and, where applicable, allow our affiliates to provide you with any purchase bonuses.

(c) Cookies used by our service providers

We use Google Analytics to analyse the use of our website. Google Analytics collects information about your use of the website via cookies. The information collected in relation to our website is used to report on the use of our website and how we can improve your experience. These cookies can track things like how much time you spend on the website and the pages you visit. The Google Privacy Policy is available at: <https://www.google.com/policies/privacy/>.

In addition, Cloudflare will add a security cookie to any domain or subdomain that is proxied by our service.

(d) cookie management

You can prevent the setting of cookies by changing your browser settings (see your browser's help on how to do this). Disabling cookies will disable all functions and features of this site. We therefore recommend that you do not disable cookies.

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