## PRIVACY AND DATA PROTECTION POLICY

The confidentiality of the Users of our Site is a priority for us, therefore we undertake to protect the confidentiality of the personal data of the Users of this website and to do everything possible so that the personal data of the Users are processed taking into account their fundamental rights and freedoms, as well as personal dignity, including in terms of ensuring their privacy.

We collect only the information that allows us to provide you our services at the highest level. It also helps us protect Exam-data from fraud and spam, and gives us an understanding of what additional services can be useful to achieve all the goals laid out in this Privacy Policy and the protection of personal data (hereinafter - the Policy).

- 1. TERMS, USED IN THIS POLICY
  - 1. The owner of the site is the copyright holder of the exam-data.com domain name, the owner of exclusive rights to use the Site, including the databases that are part of it, the information materials, graphic images and other objects that make up the Site, including the design of the Site.
  - 2. Site Administration (we) is a person or group of persons who (s) has the authority to manage the Site, moderate it, post the content of the Site and interact with Users, as well as to carry out other actions related to the use of the Site. The site administration acts on behalf of the Site Owner.
  - 3. Personal data (personal information) information or a collection of information about an individual who is identified or can be intentionally identified.
  - 4. Processing personal data any action or set of actions, such as collecting, registering, accumulating, storing, adapting, changing, renewing, using and distributing (selling, transferring), destroying personal data, including using information (automated) systems.
  - 5. Automated collection of personal data processing of personal data using computer technology.
  - 6. Site a set of data, electronic (digital) information, other objects of copyright and (or) related rights, etc., interconnected and structured within the address of exam-data.com and all subdomains including them.
  - 7. All other terms and definitions that appear in the text of the Terms of Use are interpreted by the Parties in accordance with this Policy, and in the absence of their interpretation, in accordance with the international standards.
- 2. GENERAL TERMS
  - 1. When using a site <u>exam-data.com</u> (hereafter Site), You provide us with your personal data and we put all possible effort to keep your data secure and provide you ability to manage your personal data.
  - 2. Please carefully read this Policy to be aware of what data we collect, for what purposes and how you can change, export or delete data.
  - 3. This Policy is a mandatory document and works together with the <u>Public</u> <u>Agreement</u> which are published on the Site. When using the Site, User confirms his agreement to all documents, mentioned above. In order to register on the Site and use Exam-data User needs to carefully learn the mentioned above documents and provide full acceptance of the terms via clicking the button "I confirm that I have read and accept the Privacy Policy and Public offer ".
  - 4. User doesn't have right to use Exam-data, if he does not agree with the requirements of this Policy.
- 3. PERSONAL DATA COLLECTION

- The user gives his consent to the processing of the information received, including the collection, storage, use, systematization, accumulation, storage, clarification (update, change), blocking, destruction of personal data left when using automation tools, creating a database of users of the site / service, compiling statistical reporting, as well as receiving information about research and other offers of Exam-data and its authorized representatives.
- 2. The user confirms that he agrees to receive advertising SMS-messages and emails, before the withdrawal of such consent. The User confirms his agreement that Exam-Data and authorized persons have the right to interact with the User by making direct contacts using various means of communication, including, but not limited to: mailing, electronic mail, the Internet, etc.
- 3. The site administration reserves the right to use the information sent by the above methods without special coordination with the Users and without paying the user a monetary reward. Exam-Data reserves the right to periodically update or amend this Policy unilaterally.
- 4. The user has the right to revoke his consent at any time by sending a written irrevocable message, using the contact information posted on the Site.
- 4. CATEGORY OF PERSONAL DATA
  - We collect and store only that personal information that you provide to us voluntarily or in the case when information is needed to provide (improve) our Services, and also information that is automatically stored when you use the Site.
  - 2. This information may include:
    - personally identifying data that you provide when registering your personal account, updating or changing information in it, buying Services, taking a survey, participating in discussions in open forums, sending us emails, information that you provide during transactions, other financial information, postal information. This information, in particular, includes: surname, name and patronymic, mobile phone number, email address, login and password for access to your personal account;
    - 2. automatically collected data (cookies, IP адрес, User-agent);
    - 3. data from other sources. The information we collect can be combined with information from external sources (for example, demographic data and additional contact information), including publicly available (freely available) information received by us in the manner and from sources not prohibited by applicable law.
  - 3. Automated personal data collection:
    - 1. We may collect and receive additional data and information about you. For example, while using the Site, information is automatically collected about the equipment from which you visit the Site, about software, operating system, IP address, link sources on this Site, the web pages you viewed, the parameters and settings of Internet browsers (User- agent), links that you used to access the Site, and more. Such automated data collection is carried out in order to configure convenience in working with the Site services and offers for you, as well as to prevent possible cases of fraud.
    - 2. Automated collection of some data and the use of cookies technology helps to improve the functional characteristics of the Site and to develop the Site services that are most convenient to use, helps us evaluate advertising and marketing campaigns, and also provides information that may be most interesting and useful to you. Cookies are small text files that can be stored on your computer (or other equipment) the first time you visit the Site and allow you to recognize your computer when you visit it again (for example, in order to remember your login to enter the "My Account" section "). There are several types of cookies: session cookies, which end at the end of a session on a web page and allow you to link

your actions during this session of the web page; persistent cookies that are stored on your device between sessions of the web page, which allows us to remember your settings or actions on several sites.

- 3. Cookies cannot in any way affect the operation of your computer (or other equipment) or its data, or introduce a virus.
- 4. If you don't want to transfer cookies to a third-party server, you just need to go to your browser settings and block these files by checking the corresponding box, you can also set parameters in the settings so that the system announces their sending each time. But in this case, some features of the Site may become inaccessible, or may not work correctly.
- 5. IP address is a number which is used by computers in the network to identify Your user which is needed to provide data transfer to you.
- 6. Environmental parameters include, but are not limited to, the domain from which the Internet is accessed, the time of visiting this Site, the type of browser and operating system or platform that are used, the Internet address of the website from which the transition to this Site took place, page names uploaded to this Site.
- 7. Site and Internet address of the site which did the redirect.
- 8. Such information is collected by the Site Administration for internal use, for example, to improve the security of the Site, to identify common demographic trends, to provide Exam-Data with content in accordance with your interests and to improve the use of this Site. Such information may be provided to third parties as a whole and without the possibility of identifying the identity of the User.
- 9. Please note: the Administration is limited to collecting the minimum amount of information that is necessary exclusively for the provision of Services. In any case, when non-mandatory information is requested, you will be notified at the time of collection of such information. We do not collect any information for the collection of which, the legislation establishes certain requirements, such as information about racial or ethnic origin, political, religious or ideological beliefs, membership in political parties and trade unions, allegations of a crime or conviction of criminal punishment, as well as data relating to health or sexual life.
- 5. PURPOSE OF PERSONAL DATA USAGE
  - 1. Your personal data is used with the purpose to provide you high quality services, including, but not limited to the following purposes:
    - 1. to provide support for the work of the Site services;
    - to provide proper feedback (including sending messages, inquiries; processing applications, creating a personal account, to verify your face and provide you with assistance if the User loses or forgets his username / password, "Seller-Buyer" link);
    - 3. to remember information so that you do not have to re-enter it during the current or next visit to the Site;
    - 4. to provide, improve, test and monitor the effectiveness of the service;
    - 5. to develop and test new products and features;
    - 6. to track site visits related metrics;
    - 7. to diagnose and correct technical problems with the site services;
    - 8. to inform you about new features, updates and promotions of the Site and the Site Administration;
    - 9. to use for marketing purposes, create unique offers for each User;
    - to process your payments (we can use your information to process your payments);
    - 11. to prevent fraud and spam;
    - 12. to ensure the implementation of applicable law, this Privacy Policy.

- 2. Personal data is collected and used according to, and in compliance with the laws "On the protection of personal data", "On ratification of the Convention for the Protection of Persons in Connection with the Automated Processing of Personal Data and the Additional Protocol to the Convention for the Protection of Persons in links to the automated processing of personal data regarding supervisory authorities and cross-border data flows", "On Protection of Consumer Rights", "On Information", "On Advertising", "On Telecommunications", "On Protection of Information in Information" NGOs and "international law and GDPR (General Data Protection Regulation)".
- 6. METHOD AND PLACE OF DATA PROCESSING
  - 1. Data processing is carried out using computers and (or) tools with the support of information technology in accordance with organizational procedures and the purposes of using personal data.
  - 2. In some cases, personal data may be available, except for the Site Owner and the Site Administration, to certain categories of responsible persons related to the functioning of the Site (administration, sales department, marketing department, legal department, system administrators), or to third-party organizations (such as independent suppliers technical services, postal organizations, hosting service providers, information technology companies, communications services), which the Site Owner instructs, if necessary, to deny data processing functions.
  - 3. Personal data is processed in the operational offices of the Site Owner and in any other places where there are persons who are engaged in their processing. For more information, please contact the site Administration.
- 7. PERSONAL DATA STORAGE TIME
  - 1. Personal data is stored for a period not longer than necessary. The user agrees that the personal data provided by him will be deleted at his written request within 10 (ten) days from the date of receipt of the request for their destruction.
- 8. PRINCIPLES OF PROCESSING PERSONAL DATA
  - 1. The processing of personal data is carried out legally and fairly.
  - 2. The processing of personal data is limited to the achievement of a specific, predetermined and legitimate goal. Processing of personal data incompatible with the purpose of collecting personal data is not allowed.
  - 3. The content and volume of the processed personal data are consistent with the stated processing goal. The processed personal data should not be redundant in relation to the stated purpose of their processing.
  - 4. Storage of personal data is carried out no longer than is required by the purpose of processing personal data.
  - 5. The processed personal data is subject to destruction or depersonalization after reaching the processing goal, or in case of loss of need to achieve this goal.
- 9. SITE INTERACTION WITH OTHER SERVICES
  - When the User uses the services, the codes of other Internet resources and third parties may be present on the pages of the Exam-Data Site, as a result of which such Internet resources and third parties receive your data. Therefore, these Internet resources can receive and process information that you have visited these pages, as well as other information that the User's browser transmits. These Internet resources may include:
    - 1. banner display systems (e.g. DoubleClick for Publishers, Admixer, AdRiver, etc.);
    - 2. systems for collecting statistics on service visits (for example, Google Analytics counters);
    - 3. social network plugins (e.g. Discus, Facebook, Twitter, Google+).
  - 2. The use of these administration services necessary for the operational analysis of visits to the Site, internal and external assessments of site traffic, volume of views, user activity. The administration does not save or process data received from these services.

- 3. Accordingly, if the User, for any reason, does not want these Services to gain access to his personal data, the User can voluntarily log out of his account or profile, clear cookies (via his browser).
- 10. UNDERAGE USERS
  - 1. The site is not intended for underage Users. The administration takes security issues very seriously, especially in relation to persons under the age of majority, in connection with which, for its part, the Administration calls on parents to explain to their children Internet safety issues, their specific purpose and the need to use certain services Site.
- 11. INTERACTION OF ADMINISTRATION WITH THIRD PARTIES REGARDING PERSONAL DATA
  - 1. The administration does not transfer personal data to third parties, unless the transfer is a legal requirement, at the request of the personal data subject or in other cases set forth in this Policy. The Administration understands that personal information is a value and an integral component, including the personal non-property rights of any individual, and therefore takes all possible measures to protect the personal information of Users, voluntarily and consciously transmitted by the latest Administration.
  - 2. The Site may contain links to other websites (for informational purposes only). When you click on the link to other websites, this Policy does not apply to such websites. In this connection, the Administration recommends that you read the Privacy Policy and personal data of each website before transferring personal data by which you can be identified.
  - 3. Please note: when you click on the link to other websites, the Administration's Privacy Policy and personal data will not apply to such websites. In this regard, the Administration recommends viewing the Privacy Policy and personal data of each site before transmitting personal data by which you can be identified.
- 12. PERSONAL DATA PROTECTION
  - 1. The administration uses generally accepted standards for technological and operational protection of information and personal data from loss, misuse, alteration or destruction. However, despite all efforts, we cannot guarantee absolute security against any threats that arise outside of our responsibility.
  - 2. However, the Administration ensures the application of all relevant obligations to maintain confidentiality, as well as technical and organizational security measures to prevent unauthorized or illegal disclosure, or the processing of such information and data, their accidental loss, destruction or damage.
  - 3. We enforce all relevant obligations to protect data privacy. All data collected by us is stored on one or more secure database servers. Only Exam-Data employees who need to perform work functions that require access to Users personal information have access to Users information. We provide access to information and personal data only to authorized employees who have agreed to ensure the confidentiality of such information.
- 13. CONDITIONS FOR ACCESS TO PERSONAL DATA
  - 1. The procedure for accessing personal data of third parties is determined by the conditions of the User's consent provided to the Site Administration or other entities that collect personal data to process this data, or in accordance with the requirements of the law.
  - 2. The user has the right to receive any information about himself from any subject of relations related to personal data, subject to the surname, name and patronymic, place of residence (place of stay) and details of the document certifying the individual submitting the request, except as otherwise provided by law .
  - 3. User access to personal data is free.
  - 4. Postponement of the User's access to his personal data is not allowed.

- 5. Deferred access to personal data of third parties is allowed if the necessary data cannot be provided within thirty calendar days from the date of receipt of the request. At the same time, the total time period for resolving issues raised in the request may not exceed forty-five calendar days.
- 6. A notice of the postponement is communicated to the third party who submitted the request in writing with an explanation of how to appeal such a decision.
- 14. EXTRA INFORMATION ABOUT PERSONAL DARA OF THE USER
  - 1. In addition to the information contained in this Policy, the Site Administration may provide the User upon request with additional and contextual information regarding specific Services and services or the collection and processing of personal data.
- 15. RIGHTS OF PERSONAL DATA OWNERS
  - Users have right at any time to get confirmation if their personal data was saved, check its validity, request Site administration to get the data information and origin of this information, have the right to cancel, update or correct data, or anonymize then, as well as block use of any data which are stored against the legal requirements, as well as require no data processing if there a legal requirement for this.
  - 2. If you want to update your personal data which were provided by you, or you have any comments, wishes or complaints about your personal data, please contact us via email support@exam-data.com
- 16. MAKING CHANGE TO THE PRIVACY POLICY
  - 1. Site administration has the right to at any time make changes to the given Privacy Policy, having placed on this page notification for the users. It is recommended to periodically check this page and the update date which is located in the bottom of this page.
  - 2. In case of disagreement with any changes made to the Rules, the User must stop using the Site and Exam-Data.com Services and may require that the Site Administration delete his personal data.
- 17. Legal information
  - 1. This Privacy Policy is prepared in fulfillment of the obligations stipulated by the GDPR (General Data Protection Regulation).