

# Privacy Policy

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## 1. Introduction

Welcome to the website of Contexx, a software company dedicated to providing innovative solutions. This Privacy Policy outlines how Contexx collects, uses, shares, and protects your personal information when you use our website. We are

committed to respecting your privacy and ensuring the security of your personal data. Please read this Privacy Policy carefully to understand our practices regarding your personal information.

## 2. Personal information we collect

### 2.1. Personal Information

We may collect personal information from you when you visit our website, create an account, fill out forms, make inquiries, or otherwise interact with us. This may include:

- Contact information (e.g., name, email address, phone number)
- Account credentials (e.g., username, password)
- Payment information (e.g., credit card details)
- Communication preferences
- Feedback and survey responses

### 2.2. Data Usage

We also collect certain non-personal information automatically when you visit our website. This may include:

- IP address
- Browser type and version
- Operating system
- Referral source
- Website navigation patterns
- Time and date of your visit

## 3. How we use personal information

### 3.1. Providing Services

We use the collected information to provide you with our services, process your inquiries, respond to your requests, and fulfill your orders. This includes delivering relevant content, personalized experiences, and notifications about updates or changes to our services.

## **3.2. Communication**

We use the collected information to provide you with our services, process your inquiries, respond to your requests, and fulfill your orders. This includes delivering relevant content, personalized experiences, and notifications about updates or changes to our services.

## **3.3. Analytics and Improvements**

We analyze usage data to improve our website's functionality, user experience, and security. This includes monitoring traffic, identifying trends, and optimizing our services. We may also use cookies and similar technologies to enhance your browsing experience and collect additional information about your usage patterns.

Aggregated or De-Identified Information. We may aggregate or de-identify Personal Information so that it may no longer be used to identify you and use such information to analyze the effectiveness of our Services, to improve and add features to our Services, to conduct research and for other similar purposes. In addition, from time to time, we may analyze the general behavior and characteristics of users of our Services and share aggregated information like general user statistics with third parties, publish such aggregated information or make such aggregated information generally available. We may collect aggregated information through the Services, through cookies, and through other means described in this Privacy Policy. We will maintain and use de-identified information in anonymous or de-identified form and we will not attempt to reidentify the information, unless required by law.

## **4. Disclosure of personal information**

We understand the importance of protecting your personal information and value your trust. We do not sell, trade, or rent your personal information to third parties for their marketing purposes. However, there are circumstances in which we may disclose your personal information to trusted third parties, as described below:

## **4.1. Service Providers**

We may engage trusted third-party service providers to perform various functions on our behalf. These service providers assist us with website hosting, data storage, payment processing, customer support, analytics, and other services necessary for the operation of our business. We may share your personal information with these service providers to the extent required for them to perform their services for us. However, we ensure that such service providers are bound by strict confidentiality and data protection obligations.

## **4.2. Business Partners**

In certain situations, we may collaborate with business partners to offer joint products, services, or promotions. If you choose to participate in such activities or take advantage of the jointly offered products or services, we may share your personal information with these business partners. However, we will only disclose the information necessary for the collaboration and always seek your consent when required by applicable laws.

## **4.3. Legal Requirements**

We may disclose your personal information if we believe in good faith that such disclosure is necessary to:

- Comply with applicable laws, regulations, legal processes, or government requests.
- Protect our rights, property, or safety, as well as the rights, property, or safety of our users or others.
- Detect, prevent, or address fraud, security, or technical issues.
- Enforce our policies, terms of service, or other agreements.

## **4.4. Business Transfers**

As we continue to develop our business, we may buy or sell assets, subsidiaries, or business units. In such transactions, customer information, including personal information, may be transferred as part of the business assets. If our company or substantially all of its assets are acquired, your

personal information may be one of the transferred assets. In such cases, we will provide notice and give you the opportunity to opt-out before your personal information is transferred and becomes subject to a different privacy policy.

#### **4.5. Aggregated and Non-Personal Information**

We may share aggregated or non-personal information, which does not identify individuals, with third parties for various purposes, including analytics, research, marketing, and improving our services. This information is anonymous and does not enable identification of any specific user.

We take reasonable steps to ensure that any third parties with whom we share your personal information are obligated to protect its confidentiality and security. However, we cannot guarantee the actions or policies of such third parties.

Please note that any information you voluntarily disclose in public areas of our website or through social media channels may be collected and used by others, and we have no control over such actions.

By using our website, you acknowledge and consent to the potential disclosure of your personal information as described in this Privacy Policy.

### **5. Your rights**

You have certain rights regarding your personal information, which we are committed to respecting. Subject to applicable laws, you have the following rights:

#### **5.1. Right to Access**

You have the right to request access to the personal information we hold about you. Upon receiving such a request, we will provide you with information about the categories of personal information we process, the purposes for which it is processed, and the recipients or categories of recipients to whom it has been disclosed. Please note that in certain cases,

we may be unable to provide access to specific pieces of information if it would involve disclosing personal information about another individual or if it would infringe upon the rights of others.

## **5.2. Right to Rectification**

If you believe that any personal information we hold about you is inaccurate, incomplete, or outdated, you have the right to request its correction or updating. You can do this by contacting us using the contact details provided in this Privacy Policy. We will take reasonable steps to ensure that any inaccurate or incomplete information is corrected or updated promptly.

## **5.3. Right to Erasure**

You have the right to request the erasure of your personal information in certain circumstances, such as when it is no longer necessary for the purposes for which it was collected, when you withdraw your consent and there is no other legal basis for processing, or when you object to the processing and there are no overriding legitimate grounds for the processing. However, please note that we may retain certain information as required or permitted by applicable laws and regulations, such as for legal or compliance purposes.

## **5.4. Right to Restriction of Processing**

You have the right to request the restriction of the processing of your personal information in certain situations. This means that we will temporarily suspend the processing of your personal information, but we may still store it, subject to the restrictions imposed. This right may apply, for example, when you contest the accuracy of your personal information, when the processing is unlawful but you oppose erasure, or when we no longer need the information for processing purposes but you require it for the establishment, exercise, or defense of legal claims.

## **5.5. Right to Data Portability**

You have the right to receive a copy of your personal information in a structured, commonly used, and machine-readable format and have the right to transmit that information to another data controller, where technically feasible. This right applies when the processing is based on your consent or the performance of a contract, and the processing is carried out by automated means.

## **5.6. Right to Object**

You have the right to object to the processing of your personal information on grounds relating to your particular situation, where the processing is based on legitimate interests pursued by us or a third party. We will no longer process your personal information unless we demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms or unless it is necessary for the establishment, exercise, or defense of legal claims.

## **5.7. Right to Withdraw Consent**

If you have provided your consent for the processing of your personal information, you have the right to withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

To exercise any of your rights or if you have any questions or concerns about the processing of your personal information, please contact us using the contact details provided in this Privacy Policy. We will respond to your request or inquiry in accordance with applicable data protection laws.

Please note that in order to protect your privacy and the security of your personal information, we may take reasonable steps to verify your identity before fulfilling your request.

If you are not satisfied with our response or believe that we are not processing your personal information in accordance with applicable laws, you have the right to lodge a complaint with the relevant supervisory authority in your country.

## 6. Children

Protecting the privacy of children is of utmost importance to us. Our website and services are not intended for individuals under the age of [13]. We do not knowingly collect or solicit personal information from children under the age specified by applicable laws and regulations without obtaining verifiable parental consent.

If we become aware that we have collected personal information from a child without appropriate consent, we will take steps to delete that information as soon as possible. If you believe that we may have collected personal information from a child without parental consent, please contact us using the contact details provided in this Privacy Policy, and we will promptly address the issue.

We strongly encourage parents and guardians to actively monitor their children's online activities and to help enforce this Privacy Policy by instructing their children to never provide personal information on our website without their permission. If you are a parent or guardian and become aware that your child has provided us with personal information without your consent, please contact us immediately, and we will take steps to remove that information from our records.

While we strive to provide a safe and appropriate online environment for children, it is ultimately the responsibility of parents and guardians to supervise their children's activities online and ensure their privacy and safety.



## 7. Links to other websites

The Service may contain links to other websites not operated or controlled by Context, including social media services (“Third Party Sites”). The information that you share with Third Party Sites will be governed by the specific privacy policies and terms of service of the Third Party Sites and not by this Privacy Policy. By providing these links we do not imply that we endorse or have reviewed these sites. Please contact the Third Party Sites directly for information on their privacy practices and policies.

## 8. Security and Retention

We implement commercially reasonable technical, administrative, and organizational measures to protect Personal Information both online and offline from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or email transmission is ever fully secure or error free. In particular, email sent to or from us may not be secure. Therefore, you should take special care in deciding what information you send to us via the Service or email. In addition, we are not responsible for circumvention of any privacy settings or security measures contained on the Service, or third-party websites.

We’ll retain your Personal Information for only as long as we need in order to provide our Service to you, or for other legitimate business purposes such as resolving disputes, safety and security reasons, or complying with our legal obligations. How long we retain Personal Information will depend on a number of factors, such as the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure, our purpose for processing the information, and any legal requirements.

## 9. How to contact us

Please contact support if you have any questions or concerns not already addressed in this Privacy Policy.

## 10. Revision Summary

We may update this Privacy Policy from time to time. When we do, we will post an updated version on this page, unless another type of notice is required by applicable law.

Date	Author	Approver	Comments
10-June-2023	Kateryna Yershova	Sergey Volosevich, Vasili Brutsky	Initial Version