

Privacy Notice

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This notice describes how we collect and process users' data by MAXMODAL LTD through <https://maxmodal.com> website ("Website"). The terms "we", "us", "our" refer to MAXMODAL LTD, registered under the laws of the United Kingdom.

If you would like to access our Terms of Use, please visit the following link: <https://maxmodal.com/en/Rules.pdf>

We are committed to safeguarding the privacy of our users. We will not misuse your data.

From the data protection perspective, we are a data controller for the information collected through the Website. You can contact us at:

MAXMODAL LTD

Address: 128 CITY ROAD, LONDON, ENGLAND, EC1V 2NX,

Phone: +44 7498 352167, Office hours: London time, Monday - Friday: 10:00 - 18:00

Contact email address: compliance@maxmodal.com

Acceptable Age

We do not intend to collect nor process the data of individuals under 18 years old. Only individuals who are already 18 years old may surf through the Website, use our services, and provide information to us. If we become aware that someone under the age of 18 has provided or attempted to provide us their personal data and/or registered an account, we will use our best efforts to remove the information permanently from our files and delete this account.

Information We Collect From You

Account and Profile Information

Registration. To access the full functionality of the Website, including the payment options by the banking card, you will be asked to create a user account by providing us with your username, email address, and password. We will assign a randomly generated ID to you, which will allow us to distinguish your records from others.

Profile. After creating the account, you will be able to fill in your user profile by specifying your first and last name, providing your phone number for verification purposes, and choosing the language of the interface, and optionally you can add: middle name, date of birth, city of residence, photo, company name.

Payment information. To allow you to pay for the services, we will collect your payment information, including the date and time of payments, the term for which you are paying, and payment amounts. In case of payment with the banking card, you shall provide the requisites of the banking card within the protected

payment form theMAP. Possibility to make payments with the banking card shall only be provided to the registered users.

We collect the data points described above:

- create and maintain your user account, including securing the access to it by password and two-factor authentication features;
- provide you with other services, as well as allowing you to pay for our services;
- contact you regarding the work of the Website and/or your account, including to provide you with technical support;
- based on your consent, to send you marketing emails;
- to improve the quality of our services.

We will store your account data for as long as you use our services and have the account. We will delete your data 365 days after your last user session or upon receiving the account deletion request from you.

The detailed payment process is described in the Terms of Use:

<https://maxmodal.com/en/Rules.pdf>

Other

IP logs and traffic data

During your use of the Website, we collect your IP logs. The data categories we receive may include the model of the device, operating system version, country of geolocation, user ID, date, time, and duration of the user session, pages viewed, links clicked.

We use this data for Website security and fraud prevention, debugging, and Website improvement purposes.

We will store your IP logs for 90 days after your last visit of the Website.

We also collect information about the traffic on our Website for our analytical purposes. To learn more, please refer to “Analytics” section of this Notice.

Communications with us

Occasionally, we collect user feedback and provide technical support if you have any inquiries regarding the work of our Website. We use this information to provide you with the help you might need, fix and improve our services, and analyse our efficiency in marketing and product efforts, including by creating statistics of inquiries.

We will store your communications with us for our legitimate interests and further analysis for the same period as for your account data. If you did not register the account, we will store the data for 365 days after the last communication with you. If we need to further use this information, we will fully anonymise it first.

Cookies

A cookie is a small text file that is downloaded onto your 'terminal equipment' (e.g. a computer or smartphone) when you access our website. It allows us to recognize your device and store some information about your preferences or past actions.

We use cookies to appropriately run the Website, personalise its content for you, analyse the Website traffic, and provide you with personalised advertisements. To learn more about the cookies, please read our Cookie Notice.

Legal basis for processing

Performance of Contract

We process your account data and requests for technical support to provide you with our services. Without this information, we will be unable to provide you with the full Website functionality.

Your Consent

For the e-mails with our newsletters, announcements, and other offers (marketing emails), respective web-push notification, personalisation, analytics, and marketing cookies on our website, we will obtain the consent from you first, which serves as a legal base for the processing of your information. We process your inquiries left by email because you provided them entirely voluntarily, i.e. based on your consent.

You can withdraw your consent at any time by contacting us directly. The withdrawal will not affect the lawfulness of processing based on consent before. You can also opt-out from the e-mail subscription by clicking the appropriate button in our emails to you.

Legitimate Interests

For improving the quality of the Website, as well as debugging its work, we process your IP logs and traffic data, as well as the content of your inquiries, in our legitimate interests.

Legal Compliance

If we are subject to any legal requirements to retain certain categories of data of our users, e.g. payment information, we will process the collected details to comply with law requirements.

Third-party Access to Information

Third-party service providers

The following categories of third-party providers are used to enable the work of our Website:

- Email notification provider;
- Client Relationship Management software provider, by means of which we manage our communications with users;
- Providers of website analytics and user session recordings;
- Payment processing provider;
- Cloud storage providers.

The involvement of such providers may imply the transfer of personal data outside of the European Economic Area. To ensure compliance with data protection requirements on international transfers, the Standard Contractual Clauses (SCC) as adopted by the European Commission or other suitable safeguards are signed with these providers. If you would like to obtain a copy of the SCC signed with the service providers, feel free to contact us by the means provided at the beginning of this document.

Please note, that the third-party providers can only process your data on our behalf and do not use it for their own purposes.

Analytics

We use analytic services to collect details of the Website use, including, but not limited to traffic data, location data, length visit, other communication data, IP address, device information (such as hardware model, operating system version, unique device identifiers). In aggregated form, this information allows us to analyse the popularity and usability of the Website.

Non-Personally Identifiable Information can be collected and processed on the Website by Google Analytics and Yandex.Metrica in an anonymized and aggregated way to improve Website usability and for marketing purposes.

For more information on the privacy practices:

- For Google Analytics, please check its Policies at <https://www.google.com/analytics/policies/>;
- For Yandex.Metrica, please check its General Data Protection Regulation Compliance at <https://metrica.yandex.com/about/info/gdpr>.

Other Disclosures

In addition to the disclosures for the purposes identified before, we may disclose information about you:

- if we are required to do so by law, in connection with any legal proceedings or to establish, exercise or defend our legal rights; and
 - in case we sell, license or otherwise assign our rights to the Website, or its separate parts or features to third parties.
- Except as provided in this privacy notice, we will not sell, share or rent your information to third parties.

Your rights

To maintain control of your personal data, you may exercise certain rights regarding your information. In particular, you have the right to:

- Object to the processing of your information. If we process your information in our legitimate interests, e.g., for our marketing purposes, you can object against it. We will consider your request and, if there are no compelling interests to refuse it, stop the processing for such purposes;
- Access your information. You have the right to know if we process your information; obtain disclosure regarding certain aspects of the processing; and obtain a copy of the information undergoing processing.
- Verify your information and seek its rectification. If you find that we process inaccurate or out-of-date information, you can verify the accuracy of your information and/or ask for it to be updated or corrected;
- Restrict the processing of your information. When you contest the accuracy of your information, believe we process it unlawfully or want to object against the processing, you have the right to temporarily stop the processing of your information to check if the processing was consistent. In this case, we will not process the information for any purpose other than storing it until the circumstances of restriction cease to exist;
- Ask us to delete/destroy/otherwise remove your information. If we are not obliged to keep the data for legal compliance, we will remove your information upon your request; and
- Ask us to transfer your information to another organisation if we process the information based on your consent or on the necessity to perform the contract. You can complete the request to exercise your right by contacting us at compliance@maxmodal.com

If you believe that our use of personal information violates your rights, you can lodge a complaint with the competent data protection authority.

Security of Information

We take necessary and sufficient measures to protect your information from unauthorised or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

Please note, that our team is located outside of the European Economic Area, which implies the international transfer of your data. Internally, immediate access to the data is only allowed to our authorised employees involved in maintaining our Website and conducting other processing activities. Those employees

include our backend software developer, operational and marketing team. Such employees keep strict confidentiality and prevent unauthorised third-party access to personal information.

Third-party services

Our Website may contain links to third-party services and platforms, including those posted by our partners and affiliate companies. Although we choose our partners thoroughly and diligently, we cannot be responsible for the content, terms and conditions or privacy policies of third-party services.

We encourage users to be aware when they leave our Website and to read the privacy statements of the services that collect personally identifiable information.

Third-party websites may contain their own cookies. We are not responsible for their usage of cookies.

Changes to This Notice

We may update this privacy notice from time-to-time by posting a new version on our website. We advise you to check this page occasionally to ensure you are happy with any changes. However, we will endeavour to provide you with an announcement about any significant changes.