

Oubitando OÜ

Reg. No. 14767515

Tallinn, Kristiine linnaosa, Laki tn 4, 10621

PRIVACY AND DATA PROTECTION POLICY

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INFORMATION RELATED TO THE PRIVACY POLICY OF THE WEBSITE

The document was updated on 28/04/2022 to comply with the regulations, and in particular in compliance with EU Regulation 2016/679 (Data Protection Legislation).

This section contains information related to the management methods of **Oubitando OÜ** with reference to the processing of user's data of the services provided by Oubitando OÜ through <https://www.oubita.com> and related subdomains DOMAIN ADDRESS.

The privacy policy may undergo changes due to the introduction of new rules and subsequent functionalities and services provided by the web portal. Each change will require the approval of the user during its first access to the platform next to the changes.

If the user is under the age of 16, pursuant to the article 8, c.1 EU regulation 2016/679, he/she must legitimize his/her consent through the authorization of his/her parents or guardians.

The Parties shall process personal data only to the extent and in such manner as is necessary for the purposes of performing their respective obligations.

The user shall ensure that: it has all necessary notices and authorizations in place to enable lawful transfer of the Personal Data to the Company and any data subject has been or will be informed on the personal data processing related to this Agreement.

I. GENERAL INFORMATION

1.1. This Privacy Policy explains how the Oubitando OÜ with the trade name of Oubitando, with a reg. no. 14767515, legal address: Harju maakond, Tallinn, Kristiine linnaosa, Laki tn 4, 10621, (organized under the Laws of the Republic of Estonia) („Oubitando” „Company”, „We” or „Us“), collects, stores, uses and protects personal information. You accept this Privacy Policy when using the Oubitando services or any other functions, technologies or functionality offered by the Oubitando on the website <https://www.oubita.com> or by any other means. By entering into relations with Oubitando, You agree to comply with the law of Your jurisdiction. Oubitando may use this Privacy Policy, which each of you has accepted, that is, to refuse further rendering of service.

1.2. Protecting Your private information is our priority. The Statement of Privacy Policy governs data collection and usage. For the purposes of this Privacy Policy, unless otherwise noted, by using the Oubitando website, You consent to the data practices described in this statement.

1.3. The Company is committed to keeping Your information secure and managing it in accordance with our legal responsibilities under privacy and data protection laws where we operate. The Company uses your Personal Information only in accordance with this Privacy Policy and Applicable Law (which is Estonian Law regulation). The Company does not sell your Personal Information to third parties. Any terms not defined in this Privacy Policy are defined in the Terms of Use. The Company may also collect anonymous demographic information, which is not unique to You.

1.4. We do not collect any personal information about You unless You voluntarily provide it to us. However, You may be required to provide certain personal information to us when You elect to use certain products or services available on the Site. These may include:

1. registering for an account on our Site;
2. signing up for special offers from selected third parties;
3. sending us an email message;
4. submitting Your credit card or other payment information when ordering and purchasing products and services on our Site. To wit, we will use Your information for, but not limited to, communicating with You in relation to services and/or products You have requested from us. We also may gather additional personal or non-personal information in the future.

1.5. This Privacy Policy applies solely to information collected by this website. It will notify you of the following:

1. What personally identifiable information is collected from you through the website, how it is used and with whom it may be shared.
2. What choices are available to you regarding the use of your data.
3. The security procedures in place to protect the misuse of your information.
4. How you can correct any inaccuracies in the information.
5. You can access our website home page and browse our site without disclosing your personal data.

II. ACCEPTANCE OF THE COMPANY PRIVACY POLICY

2.1. By using the Company's website and the Service you are deemed to have read and understood this Privacy Policy. The Company reserves the right to update this Privacy Policy at any time by posting an updated version on the Site and you are deemed to have read and understood the current version each time you use the Site. We encourage you to periodically review this page for the latest information on our privacy practices.

III. DATA PROCESSING

3.1. DATA CONTROLLER

3.1.1. The data controller is the natural or legal person, public authority, service or other body that, individually or together with others, determines the purposes and means of processing personal data. This position also deals with safety profiles.

3.1.2. With regards to this website, the data controller is: Oubitando OÜ, and for any clarification or exercise of the rights of the user he can be contacted at the following email address: privacy@oubita.com

3.2. DATA PROCESSING LOCATION

3.2.1. The processing of data, generated by the use of the services provided by Oubitando OÜ through the web portal, takes place at Harju maakond, Tallinn, Kristiine linnaosa, Laki tn 4, 10621.

3.2.2. In case of need, the data related to the newsletter service can be processed by individuals appointed for this purpose by the Owner, at their respective locations.

3.2.3. The personal data of the users, collected through the registration to the platform, are used to guarantee a correct association between the controller and the user, and to offer trust and transparency to the users of the platform.

IV. COOKIES

4.1. The Oubitando OÜ website uses cookies to make the user's browsing experience easier and more intuitive: cookies are small strings of text used to store some information that may concern the user, his preferences or the device used to access the Internet (computer, tablet or mobile) and these cookies are mainly used to adapt the operation of the website to the user's expectations, offering a more personalized browsing experience and memorizing the choices made previously.

4.2. A cookie consists of a reduced set of data transferred from a web server to the user's browser and it can only be read by the server that made the transfer. This is not executable code and does not transmit viruses.

4.3. Cookies do not record any personal information and any identifiable information will not be stored. If you want, you can prevent the saving of some or all cookies. However, in this

case the use of the website and the offered services could be compromised. To proceed without changing the options related to cookies, simply continue browsing.

4.4. Below there are the types of cookies that are used by the website:

4.4.1. TECHNICAL COOKIES

4.4.1.1. There are many technologies used to store information on the user's computer, which are then collected by the websites. Among these, the best known and used one is based on HTML cookies. They are used for navigation and to facilitate the access and use of the website to the user. They are necessary for the transmission of communications on the electronic network and for the supplier, to provide the service requested by the customer.

4.4.1.2. The settings to manage or deactivate cookies may vary depending on the used internet browser. In any case, the user can manage or request the general deactivation or cancellation of cookies, modifying the settings of his internet browser. This deactivation can slow down or prevent access to some parts of the website.

4.4.1.3. The use of technical cookies allows the safe and efficient use of the website.

4.4.1.4. Cookies that are inserted in the browser and retransmitted by Google Analytics or by the statistics service of blogger providers or similar services are considered as technical only if they are used for the purpose of optimizing the website directly from the owner of the website, which can collect information in aggregate form about the number of users and how they visit the website. Under these conditions, the same rules provided for technical cookies, in terms of privacy policy and approval, are applied to analytics cookies.

4.4.1.5. From the duration point of view, it's possible to identify the temporary session cookies, which are deleted automatically at the end of the browsing session and are used to identify the user and thus avoid logging into each visited page, and permanent ones, which remain active in the PC until expiry or cancellation by the user.

4.4.1.6. Session cookies may be installed in order to allow the access and the continuity of operations in the reserved area of the platform as an authenticated user. They are not permanently stored, but only for the duration of the navigation, until the browser is closed, and disappear when the browser is closed. Their use is strictly limited to the transmission of session identifiers, consisting of random numbers generated by the server and needed to allow the safe and efficient browsing of the website.

4.4.2. THIRD-PARTY COOKIES

4.4.2.1. Depending on the provenance, it's possible to identify the cookies that are sent to the browser directly from the website that the user is browsing and those owned by third parties, sent to the computer from other websites and not from the one that the user is browsing.

4.4.2.2. Permanent cookies are often third-party cookies.

4.4.2.3. The majority of third-party cookies consists of tracking cookies, used to identify online behavior, understand the interests and then customize the advertising proposals for users.

4.4.2.4. Third-party analytical cookies may be installed. They are sent from the domains of the aforementioned third parties that are external to the website.

4.4.2.5. The third-party analytical cookies are used to provide information about the behavior of users on Oubitando OÜ platform. The detection is anonymous, in order to monitor the performance and improve the usability of the website. The third-party profiling cookies are used to create users' profiles, in order to propose advertising messages that follow the choices expressed by the users.

4.4.2.6. The use of these cookies is governed by the rules set by the third parties themselves, therefore, users are invited to read the privacy policies and the indications to manage or disable the cookies, that are published on the related web pages.

4.4.3. PROFILING COOKIES

4.4.3.1. Profiling cookies are used to create profiles related to the user and they are used in order to send advertising messages that follow the preferences expressed by the user when surfing the net.

4.4.3.2. When these types of cookies are used, the user must give explicit consent.

V. SHARING INFORMATION WITH THIRD PARTIES

5.1. The Company may, from time to time, contact You on behalf of external business partners about a particular offering that may be of interest to You. In those cases, Your unique personally identifiable information (e-mail, name, address, telephone number) is transferred to the third party. The Company may share data with trusted partners to help perform statistical analyses, send You email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using personal information except to provide these services to the Company, and they are required to maintain the confidentiality of Your information.

5.2. The Company may disclose Your personal information, without notice, if required to do so by law or in the good faith belief that such action is necessary to:

- (a) conform to the edicts of the law or comply with legal process served on the site;
- (b) protect and defend the rights or property of the Company and/or;
- (c) act under exigent circumstances to protect the personal safety of users of the Company, or the public.

Personal data held by us may be transferred to:

- Other Companies member firms;

We may share personal data with other Company member firms (affiliated companies) where necessary for administrative purposes and to provide professional services to our

clients (e.g. when providing services involving advice from Company member firms in different territories).

- Third parties that provide applications/functionality, data processing or IT services to the Company. The verification of the information provided by the user may be transferred to appointed external company or third party such as KYC provider; the verification operations are performed by appointed, specialized personnel internal to Oubitando OÜ or to an appointed third-party, which shall follow rigorous verification procedures;
- Banks and payment providers – to authorise and complete payment transactions;
- Third party identity checking or credit reference agencies – for the purposes of identity checking and bank account verification;
- Organisations within the payment card industry to help prevent online fraud.

5.3. We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud-based software as a service providers, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centers around the world, and personal data may be stored in any one of them:

1. Third parties that otherwise assist us in providing goods, services or information;
2. Auditors, lawyers and other professional advisers;
3. Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation.

5.4. We may receive requests from third parties with the authority to obtain disclosure of personal data (Financial inspection, Financial Intelligence Unit, etc), such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

5.5. The Company may keep track of the websites and pages of our users, in order to determine what services are the most popular. This data is used to deliver customized content and advertising within a Company to customers whose behavior indicates that they are interested in a particular subject area.

5.6. Information about Your computer and software may be automatically collected by the Company. This information can include Your IP address, browser type, domain names, access times and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Companies website.

5.7. If a Company is involved in a merger, acquisition or sale of all or a portion of its assets, your Personal Information will be shared with the relevant co-party.

5.8. When we provide Personal Information to these third parties, it is possible that this will involve transferring your Personal Information to countries outside the European Economic Area (“EEA”). Where this is the case, we will ensure that there are measures in place so that your Personal Information has an adequate level of protection.

5.9. The Company’s website may share some of the collected data with services located outside the European Union. In particular with Google, Facebook and Microsoft (LinkedIn) through social plugins and the Google Analytics service. The transfer is authorized and strictly regulated by Article 45, paragraph 1 of EU Regulation 2016/679, so no further consent is required. The companies mentioned above guarantee their

1. passport details and scan-copies of the user personal documents;
2. card payment information;
3. operations performed at a branch;
4. agreements you have entered into;
5. information we obtain about You in your communication with our Consultation Center.

6.3. The data we collect depends on the services You use. We may collect information such as name, identification code, date of birth or preferred language of communication, KYC documentation, including but not limited to, amendments and revisions and updates as these are deemed necessary, from time to time, for the provision of the services. Personal data is also data acquired from 3rd parties such as public registries, for example the Register of Economic Activity, Commercial Register, etc. You can control what data you want to share with us. Your personal data will be stored no longer than necessary for the purpose of the processing activity.

6.4. We collect Your basic payment information and we may also ask you to confirm your home address. When you create an Account on our website for the purpose of listing a Project, we may ask, among other things, for your name, email address, postal address, phone number, bank account details. You may decline to provide us with your Personal Information, but this may prevent you from using certain services.

6.5. We keep your data only for as long as it is needed for the purpose for which your data were registered and used. For example: In accordance with the Law on the Prevention of Money Laundering and Terrorist Financing we may store copies of the identity documents of the customer, the identity data of the beneficial owner, the identity data of the beneficiary, direct video streaming/direct video broadcasting recordings, other data received at the time of establishing the identity of the customer and account and/or agreement documentation (originals of the documents) for five years from the date of termination of transactions or business relationships with the customer, and the period may be prolonged for up to additional two years.

VII. USER RIGHTS

7.1. You can obtain insight into the personal data we registered and use, where it comes from and what we use it for. You can obtain information about for how long we store your

data and about who receives data about you, to the extent that we disclose data. Your right of access may, however, be restricted by legislation, protection of other persons' privacy and consideration for our business and practices. Our know-how, business secrets as well as internal assessments and material may also be exempt from the right of insight.

7.2. If the data is incorrect, incomplete or irrelevant, you are entitled to have the data corrected or erased with the restrictions that follow from existing legislation and rights to process data. These rights are known as the "right to rectification", "right to erasure" or "right to be forgotten".

7.3. If you believe that the data we have registered about you is incorrect, or if you have objected to the use of the data, you may demand that we restrict the use of these data to storage. Use will only be restricted to storage until the correctness of the data can be established, or it can be checked whether our legitimate interests outweigh your interests.

7.4. If we use data based on your consent or as a result of an agreement, and the data processing is automated, you have a right to receive a copy of the data you have provided in an electronic machine-readable format.

VIII. CONTACT DETAILS AND HOW CAN YOU COMPLAIN

8.1. You are always welcome to contact us if you have questions about your privacy rights and how we register and use personal data. You can contact our Data Protection Officer by writing to the email: address: privacy@oubita.com

IX. WITHDRAWAL OF CONSENT

9.1. You can withdraw your consent to disclose data that requires your consent at any given time. To withdraw consent to our processing of your personal data please email us at info@oubita.com or, to stop receiving an email from a Company marketing list, please click on the unsubscribe link in the relevant email received from our Company.

X. KEEPING INFORMATION SECURE

10.1. We invest significant resources to protect your Personal Information from loss, misuse, unauthorised access, modification or disclosure. However, no internet-based site can be 100% secure and we cannot be held responsible for unauthorised or unintended access that is beyond our control.

10.2. While we use encryption to protect sensitive information transmitted online, we also protect your information off-line. Only employees who need the information to perform a specific job (for example, lawyers, compliance department, etc) are granted access to personally identifiable information.

10.3. This website processes the data of users in a lawful and correct manner, adopting appropriate security measures to prevent unauthorized access, disclosure, modification or unauthorized destruction of data.

10.4. Processing is carried out using IT and/or cloud service tools, with organizational methods and with techniques strictly related to the indicated purposes. The data provided by the users individual and corporates for identification, verification and geolocation are sent in encrypted form between the individual and corporates and the web platform, and through a daily procedure are transferred and offline stored in an isolated, safe and protected environment, in accordance with the current legislation.

10.5. In addition to the Data Controller, in some cases, other employees involved in the website's and cloud operations (administrative, commercial, marketing, legal department or system administrators) or external subjects (as suppliers of third-party technical services, courier and postal services, hosting providers, IT companies, communication agencies) may have access to the data.

XI. QUESTIONS AND CHANGES TO THIS DOCUMENT

11.1. For further information about our Privacy Policy please contact us via the email address at privacy@oubita.com.

11.2. This document is published in the website link: <https://www.oubita.com> constitutes the privacy policy of this website.

11.3. This document was updated on 28/04/2022 to comply with the latest regulations, and in particular in compliance with EU Regulation 2016/679.