

Privacy Policy

This Privacy policy (hereinafter - **Privacy policy**) stipulates the procedure of personal data processing by Administration of the Website, types of personal data that are collected, the goal of using personal data, interaction of Website administration with the third parties, safety measures for protection of personal data, conditions for access to personal data, contact information for the User related to acquiring of access, making changes, blocking or deleting of his personal data and contacting with any questions that may arise regarding the personal data protection procedures.

Privacy policy shall be in effect in relation to all information that can be acquired by Administration of the Website located at the address - **import.people2people.com.ua** about the User during his usage of the Website.

1. DEFINITIONS

1.1. This Privacy policy uses the following definitions:

1.1.1. **“Administration of the Website - import.people2people.com.ua (hereinafter - Website administration)”** - private individuals or legal entities authorized for Website management that organize and (or) conduct processing of personal data and define the goals of such processing, the content of personal data to be processed, actions (operations) that are conducted with personal data.

1.1.2. **“Personal data”** - any information that is used or may be used to identify a private individual (the subject of personal data) that is provided by the latter in the process of using the website services and/or ordering services.

1.1.3. **“Processing of personal data”** - any action or a series of actions such as collecting, registering, accumulating, storing, adaptation, changing, updating, using and sharing (spreading, realization, transferring), depersonalization, deleting of personal data, including using the informational (automated) systems.

1.1.4. **“Privacy of personal data”** - a commitment not to allow the spreading of personal data without the consent of the subject of personal data or other legal reasons, mandatory for any private individual and/or legal entity that gains the access to personal data.

1.1.5. **“Website user (hereinafter - User)”** - a person that has an access to Website via Internet network and is using the Website.

1.1.6. **“Cookie files”** are text files containing the small amount of information that is provided to a web browser and stored on the user’s device. Such device may be a computer, mobile phone or other device that is used by the user to visit the Website.

2. GENERAL PROVISIONS

2.1. Using a Website by the User shall mean his consent with this Privacy policy and the conditions of User’s personal data processing.

2.2. In case of disagreement with the Privacy policy conditions, User shall stop using Website.

2.3. This Privacy policy shall be applicable only to Website - **import.people2people.com.ua**. Website administration does not control and shall not bear responsibility for the websites of third parties where User can move via the link available on the Website.

2.4. Website administration does not verify correctness of personal data provided by the User on the Website.

3. THE SUBJECT OF PRIVACY POLICY

3.1. This Privacy policy regulates the obligation of Website administration related to non-disclosure and ensuring the security of privacy of personal data that User provides to Website administration during the usage of Website services and/or ordering services.

3.2. Personal data allowed for processing as part of this Privacy policy may include the following information:

3.2.1. User's first name, last name, patronymic name;

3.2.2. Email address;

3.2.3. User's phone number;

3.2.4. Identification of the country and place of residence of the User according to his IP address;

3.2.5. Information that is automatically stored in server logs and includes: IP address allocated to the User by Internet services provider; information about User's browser (or other program used for accessing services); names of pages visited by User on the Website; date and duration of the session on the Website.

3.3. Rights and obligations of Website user are regulated by the Law of Ukraine № 2297-VI "On protection of personal data" dd. 01.06.2010.

4. USING COOKIE FILES

4.1. Cookie files can be either permanent to be stored on the computer until the user deletes them or temporary (such Cookie files may be called session cookies) i.e. stored only until the browser is closed. In addition, Cookie files are divided into general (installed by the visited Website) and third-party files (installed by other websites).

4.2. During the User's subsequent visit of the Website, Cookie files data is updated; in most cases, web browser allows automatic storing of Cookie files on the User's device by default; deactivation of Cookie files may lead to limited access and incorrect functioning of Website services. Using Cookie files, Website administration can also analyze the behavior, advantages and interests of the User. Such analysis may help to improve Website User experience.

4.3. In accordance with the International Chamber of Commerce classification, Website administration is using such categories of Cookie files:

4.3.1. Strictly necessary Cookie files are required for proper display of Website to the User and for using certain services, for example, for access to secured pages, registration and authorization, conducting search on the Website. Such files are also used for remembering User's actions before going to the previous page within the same session.

4.3.2. Performance Cookie files are aggregating the information about how the Website is used. Such data is stored on User's device between the web browsing sessions. Examples of such data may include the following metrics: time spent on the Website, most visited pages, understanding of what sections and services on the Website are most interesting to the User, how efficient is the ad and/or marketing campaign etc.

All information collected using performance cookie files can be used for statistical and analytical purposes. Some Cookie files may be provided to third parties that have the permission from a web resource and solely for the abovementioned purposes.

4.3.3. Functional Cookie files are used for storing parameters and configurations that are stored on User's device between the web browsing sessions. Examples of such data may include the following metrics: full name of the User, information about the submitted comments, language version of the website, location, information about whether User has been previously provided with any information or advantages, as well as any other parameters of Website preferences.

Such Cookie files also allow Users to watch the video, participate in the activities (comments) and interact with social networks.

In order to improve the user experience, such cookie files store the information provided by the User, benefiting the Website interaction efficiency.

Some Cookie files may be provided to third parties that have the permission from a web resource and solely for the abovementioned purposes.

4.3.4. Target Cookie files are used for providing content that may be interesting to the User. Such data is stored on User's device between the web browsing sessions. Examples of such data may include the following metrics: tracking of the recommended text, graphical, audio and video materials to avoid repeating display; targeted ad management, evaluation of ad campaigns efficiency, information about other resources visited by the User upon transitions, as well as other parameters of Website preferences.

Website may share this information with third parties, including media clients, advertisers, agencies and others, for them to provide quality targeted advertising.

4.3.5. Cookie files of the third-party services and analytics services.

For prompt delivery, more quality display and detailed analysis of content on the Website, Website administration is using services that are owned by third-party companies such as Facebook, Google and others.

Companies specified as an example may use Cookie files stored on the User's device during his stay on the Website.

It's worth noting that Website can not influence operation of Cookie files used by such services. All necessary information about their use can be found by visiting the corresponding resource.

4.4. Cookie files management:

4.4.1 Common web browsers (listed below) are set up to automatic accepting of Cookie files. In order to switch it off, use help section in your browser. Configuration of Cookie files properties for web browsers on mobile devices may be different.

4.4.2. In order to contact Website administration regarding the use of Cookie files, find Website administration contacts provided in this Privacy policy.

If the User doesn't allow the use of Cookie files or intentionally deletes all Cookie files from his web browser, during the following visit of the Website, the User may be offered to activate and use Cookie files again.

Information about the Users received from Cookie files shall not be sold or shared in the public access, as well as shall not belong to Website administration owning the resource.

5. THE GOALS OF COLLECTING USER'S PERSONAL DATA

5.1. Website administration may use User's personal data with the following aims:

5.1.1. Identification of User for processing an order and (or) concluding the Agreement (for rendering services) in the remote mode.

5.1.2. Contacting the User, including sending of messages, requests related to Website usage, rendering of services, processing of User's requests.

5.1.3. Detecting User's location for ensuring security, fraud prevention.

5.1.4. Verification of the correctness and completeness of personal data provided by the User.

5.1.5. Notifying Website user about the order status.

5.1.6. Processing and receiving of payments, confirming tax or tax concessions, denying of payment.

5.1.7. Provision of efficient client and technical support to the User in case of problems related to Website usage.

5.1.8. With User's permission, provision of service updates, special offers, price information to the User. Email newsletters and other information sent on behalf of Website or Website partners.

5.1.9. Provision of access to websites or services of Website partners to the User.

6. METHODS AND TERMS OF PERSONAL DATA PROCESSING

6.1. User's personal data processing is carried out without the limitation in time period, in any legal way, including within personal data informational systems with automation tools or without them, in accordance with the Law of Ukraine № 2297-VI "On protection of personal data" dd. 01.06.2010.

6.2. User agrees with the fact that Website administration has the right to transfer personal data to third parties for using of a certain service by the User or for carrying out a certain agreement with the User.

6.3. User's personal data may be transferred to the authorized state institutions of Ukraine only on the basis and within the procedure stipulated by the legislation of Ukraine.

6.4. In case of loss or dissemination of personal data, Website administration shall inform the User about the loss or dissemination of personal data.

6.5. Website administration shall undertake the necessary organizational and technical means to protect personal information of the User from the unlawful or accidental access, destruction, twisting, blocking, copying, sharing, as well as other unlawful actions of third parties.

6.6. Together with the User, Website administration shall undertake all necessary measures to prevent damages or other negative consequences induced by the loss or dissemination of User's personal data.

7. OBLIGATIONS OF THE PARTIES

7.1. User shall be obliged to:

7.1.1. Provide the information about personal data necessary for using the Website.

7.1.2. Update and amend the personal data information provided in case of changes in such information.

7.2. Website administration shall be obliged to:

7.2.1. Use the obtained information exclusively for purposes specified in p. 4 of this Privacy policy.

7.2.2. Ensure storing of personal information in secret, not disseminate it without the advance consent of the User, as well as not to sell, exchange, publish or disseminate in other ways the provided personal data of the User, except for p. 6.2. and p. 6.3. of this Privacy policy.

7.2.3. Carry out precaution measures to protect privacy of User's personal data according to the procedure that is usually undertaken for protection of such information in the existing business conduct.

7.2.4. Ensure blocking of personal data that relate to a certain User from the moment of inquiry or request from the User or his legal representative or authorized institution for protection of rights of subjects of personal data for the period of investigation, in case of detecting the incorrect personal data or unlawful actions.

8. LIABILITIES OF THE PARTIES

8.1. In case of non-fulfillment of its obligations, Website administration shall be liable for damages incurred by the User relating to the unlawful use of personal data, in accordance with the legislation of Ukraine, except for cases stipulated by p. 6.2., 6.3. and 8.2 of this Privacy policy.

8.2. In case of loss or dissemination of confidential information, Website administration shall not be liable if such information:

8.2.1. Has become a public domain before its loss or dissemination.

8.2.2. Has been obtained from a third party before the moment of its acquisition by the Website administration.

8.2.3. Has been disseminated with the consent of the User.

9. DISPUTE RESOLUTION

9.1. Before taking legal recourse about the disputes arising from the relations between Website user and Website administration, it's mandatory to advance a claim (written offer about the voluntary pre-trial dispute regulation).

9.2. Claim recipient shall notify the claimer about the results of claim examination in the written form within 30 calendar days since the day of receiving the claim.

9.3. In case of inability to achieve consensus, dispute shall be forwarded to a court review at the location of Website administration.

10. ADDITIONAL TERMS AND CONDITIONS

10.1. Website administration shall have the right to amend this Privacy policy without the consent of a User.

10.2. New Privacy policy shall take force since the moment of its publication on the Website, if not otherwise stipulated by new edition of Privacy policy.

10.3. Acting legislation of Ukraine shall be applicable to this Privacy policy and relations between the User and Website administration.

In case you have suggestions and/or questions related to this Privacy policy, please contact Website administration using the contact details indicated below:

Phone number: +380 (44) 221-53-30

Email: e@people2people.com.ua