



Privacy Policy

This document "Privacy Policy" (hereinafter referred to as the "Policy") represents the rules for the use of the User's personal information by the limited liability company Sibedge.

1. General provisions of the Policy

1.1. This Policy is an integral part of the Personal Data Processing Agreement posted and/or available on the Website at:

<https://sibedge.team>, as well as other agreements concluded with the User, when this is expressly provided for in their terms.

1.2. By entering into the Agreement, the User freely, voluntarily and in their own interests gives written consent to the following methods of processing their personal data: collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction.

1.3. This Policy, including the interpretation of its provisions and the procedure for acceptance, execution, modification and termination, is subject to the laws of the Republic of Cyprus and respective EU legislation.

2. Main concepts used in the Policy

2.1. Automated processing of personal data – processing of personal data using computer technology;

2.2. Blocking of personal data – temporary termination of processing of personal data (except for cases when processing is necessary to clarify personal data);

2.3. Website – a set of graphic and informational materials, as well as computer programs and databases that ensure their availability on the Internet via a network connection

at <https://sibedge.team>;

2.4. Personal data information system – a set of personal data contained in databases, and technologies and technical means that ensure their processing;

2.5. Depersonalization of personal data – actions that make it impossible to determine the identity of personal data to a specific User or other personal data subject without using additional information;

2.6. Personal data processing – any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;

2.7. Operator – a state body, municipal body, legal entity or an individual that independently or jointly with other persons/entities/bodies organizes and (or) performs processing of personal data, as well as determines the purposes of personal data processing, personal data to be processed, actions (operations) performed with personal data;

2.8. Personal data – any information related directly or indirectly to a specific or identifiable <https://sibedge.team> website User;

- 2.9. User – any user of <https://sibedge.team> website;
- 2.10. Provision of personal data – actions aimed at disclosure of personal data to a certain person or a certain circle of persons;
- 2.11. Distribution of personal data – any actions aimed at disclosure of personal data to an indefinite circle of persons (transfer of personal data) or at familiarization with personal data of an unlimited number of persons, including disclosure of personal data in the mass media, placement in social and telecommunication networks, or providing access to personal data in any other way;



- 2.12. Cross-border transfer of personal data – transfer of personal data to the territory of a foreign state to a foreign state authority, a foreign individual, or a foreign legal entity;
- 2.13. Destruction of personal data – any action in the course of which personal data is destroyed irrevocably, impossible to restore the contents of personal data in the information system of personal data and (or) which are destroyed material carriers of personal data.

3. User's Personal Data

- 3.1. Surname, name, patronymic;
- 3.2. Email address.
- 3.3. Phone numbers.
- 3.4. Data that is transmitted automatically (cookies, IP).

4. Purposes of personal data processing

- 4.1. Purpose of processing the User's Personal Data:
 - Implementation of civil and commercial relations;
 - Maintaining client database;
 - Conducting audits and other internal research to improve the quality of services provided.
- 4.2. The Operator also has the right to send notifications to the User about new products and services, special offers and various events. The User can always refuse to receive information messages by sending an email to the Operator at contacts@sibedge.com titled "Unsubscribe from notifications of new products and services and special offers".
- 4.3. Depersonalized User Data collected through Internet statistics services is used to collect information about User actions on the site, improve the quality of the site and its content.

5. Legal grounds for processing personal data

- 5.1. The operator processes the User's Personal Data only if it is filled in and/or sent by the User independently via special forms that can be found on the website <https://sibedge.team>. By filling out the appropriate forms and/or sending their personal data to the Operator, the User agrees with this Policy.
- 5.2. The Operator processes depersonalized data about the User if this is allowed in the User's browser settings (cookies and using JavaScript technology are enabled).

6. Data collection, storage, transmission, and other types of personal data processing procedure

- 6.1. Security of personal data processed by the Operator is ensured by implementing legal, organizational and technical measures necessary in order to fully comply with the requirements of current personal data protection legislation.

Measures aimed at detecting and preventing violations stipulated by the law are:

- internal control of personal data processing compliance with the Federal law "On personal data" and regulatory legal acts adopted in accordance with it;
- assessment of the damage that may be caused to personal data subjects in the event of the Federal law violation, the ratio of such damage and the measures taken by the LLC
- "Sibedge" aimed at ensuring compliance with the obligations stipulated by the Federal law;
- assign a person responsible for processing personal data;
- publication of documents that define the policy for personal data handling;

6.2. The Operator ensures safety of personal data and takes all possible measures to prevent access to personal data of unauthorized persons.



6.3. The Operator undertakes not to transfer the received personal data to third parties, except in the following cases:

- at the request of the respective authorized state authorities only on the grounds and in accordance with the procedure established by the legislation of the respective country or territory;
- strategic partners who work with the Operator to provide products and services, or those who help the Operator sell products and services to consumers. The Operator provides third parties with the minimum amount of personal data required only to provide the required service or conduct the required transaction.

6.4. If inaccuracies in personal data are detected, the User can update them independently by sending a notification to the Operator's email address contacts@sibedge.com titled "Updating personal data".

6.5. The term for processing personal data is unlimited. The User can withdraw their consent to personal data processing at any time by sending a notification to the Operator via email to the Operator's email address contacts@sibedge.com titled "Revocation of consent to the processing of personal data".

7. Cross-border transfer of personal data

1. The Operator must ensure that the rights of personal data subjects are reliably protected by the foreign state to which the personal data is intended to be transferred prior to the start of personal data cross-border transfer.
2. Personal data cross-border transfer on the territory of foreign states that do not meet the above requirements can only be carried out if the personal data subject agrees in writing to such cross-border transfer of their personal data and/or the execution of the contract to which the personal data subject is a party.

8. Final provisions

8.1. The User can get clarifications on any issues related to the processing of their personal data by contacting the Operator via e-mail at contacts@sibedge.com.

8.2. The Operator reserves the right to make unilateral changes to these rules, provided that the changes do not contradict the current legislation of the Republic of Cyprus and EU. Changes to the terms of these rules will take effect after they are published on the Website.

8.3. The current version of the Policy is freely available on the Internet at <https://sibedge.team>.