

PRIVACY POLICY

web.chocopay.io

Your personal data is processed by **CYPHER GOODS WHOLESALERS LLC**, registered at Office No. 301A - Dubai Investment Properties (LLC) - Al Raqqa. If you believe your personal information has been used improperly, please reach out to us at info@chocopay.io.

This Privacy Policy (hereinafter «Privacy Policy») applies to all information and data Chocopay could receive about Users (hereinafter «You» or «Users») when such Users visit the website <https://web.chocopay.io/> (hereinafter «web.chocopay.io» or «Website»).

Privacy Policy provides information about Website and platform, which enables Users to use services, and then describes our principles about data collection and use. It also describes the type of data Chocopay collects and utilizes when showing ads to Users.

Chocopay provides its services strictly in accordance with the appropriate legislation regarding the collection and processing of data, the principles and rules of international legislation regarding the collection, processing, and protection of data.

When visiting web.chocopay.io, Chocopay may receive information that You voluntarily provide and may collect certain «cookie» information from Your device. Please note that You are not required to provide us personal information when You use web.chocopay.io.

1. COLLECTION OF INFORMATION

1.1. Among the types of Personal Data that the Website collects, by itself or through third parties, there are: first name; last name; date of birth; company name; address; country; state; county; email address; ZIP/Postal code; various types of Data; city; User ID; website; Trackers; Usage Data; phone number; payment data; username; password; gender; device information; geographic position; profile picture; number of Users; session statistics; latitude (of city); longitude (of city); browser information.

1.2. Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection. Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

1.3. Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

1.4. Any use of Cookies – or of other tracking tools — by this Application or by the Chocopays of third-party services used by this Application serves the purpose of providing

the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

1.5. If You would like to register an account on web.chocopay.io and accept our Terms of Use, then we need information about You for the following purposes:

- to fulfill Your request/claim from contact form on chocopay.io;
- to understand and meet Your needs and preferences;
- for marketing purposes (add You to our email subscription list, send You promotional materials, our partner's information, to implement targeted display ads, etc.); You will only receive advertising if You have given Your explicit consent;
- to meet legal and regulatory requirements.

1.6. If You decide to request any information via the contact form provided on our Website, we will ask for Your name and e-mail address in order to handle Your personal request or to provide the services You requested from us.

1.7. To join web.chocopay.io and use our services You shall create an account. All mandatory information required in order to register is marked accordingly. All further information is provided voluntarily; this data is used for the purposes stated, or to improve our online services. We hope that You will provide us with this information. As a part of registration process, we may ask You to provide us with the following information, which may include Your personal data:

- Your name for salutation;
- e-mail address for Your authorization in registration purposes, for information and notification purposes during using chocopay.io, for technical support issues;
- phone number for communication and technical support (in some cases Your phone number may be requested by our partners, who cares about paYouts);
- payment details, if applicable (e-wallet address, bank account etc.);
- Your language;
- password for Your account on chocopay.io (please, select for Your own safety a secret and secure password in order to ensure the confidentiality of Your data; in the event that You forget Your password, please use the «Forgot password» function provided on the website to create a new, secure one).

1.8. Chocopay may collect anonymous data of Users regarding the IP address of the user's equipment, the Internet service provider, device type, browser language in use, and his version of the operating system installed on user's equipment, information about user's visited sites where our advertising placed such as the URL address, the date and time of visits, the pages viewed, time spent.

1.9. We may expand the list of personal data requested from You by amending Privacy Policy.

2. STORAGE OF PERSONAL DATA

2.1. Data provided to us is stored in accordance with applicable laws, at secure locations. We take reasonable steps to ensure that the personal information we collect about You remains accurate, timely, and secure. In order to avoid loss or misuse of data stored by us, we take necessary technical and organizational safety measures, which are regularly checked and updated.

2.2. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure and while we strive to protect Your personal information, we cannot guarantee or warrant its complete security. We shall not be responsible for losses that You or any person may suffer as a result of a breach of confidentiality in respect to Your use of the Website or any information You transmit to the Website. Also, we do not assume any responsibility for the data You submit to or receive from us through the Internet or for any unauthorized access or use of that information and we cannot and do not guarantee that information communicated by You to us or sent to You by us will be received or that it will not be altered before or after its transmission to us. We have no technical influence on third parties, which are beyond our control.

2.3. We are going to store Your personal data until Your request to terminate Terms of Use between us. If You do not want to use services of our Website anymore and delete Your account, please, notify us in Your account or by contact form. The company does not store user card data, but uses a payment service provider to process this data.

2.4. Methods of processing. Chocopay takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data. The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Chocopay, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Chocopay. The updated list of these parties may be requested from the Chocopay at any time.

2.5. The Data concerning the User is collected to allow the Chocopay to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Contacting the User, Access to third-party accounts, Advertising, Interaction with external social networks and platforms, Analytics, Displaying content from external platforms, Handling payments, Registration and authentication, Hosting and backend infrastructure, Managing contacts and sending messages, User database management, Platform services and hosting, Remarketing and behavioral targeting, Backup saving and management, Handling productivity related activity , Tag Management, Infrastructure monitoring, Heat mapping and session recording, Interaction with online survey platforms and Connecting Data.

3. TRANSFER OF PERSONAL DATA

3.1. We shall not pass by any means or/ and under any circumstances Your information to third parties, except for the provision of this information to such third parties, which operates on our behalf and solely for the provision of services. You agree that we instruct third parties to process payment transactions and to forward the provided payment requisites to them solely for this purpose.

4. DISCLOSURE OF PERSONAL DATA

4.1. We may disclose information that we collect about You should we have reason to believe that:

- it is necessary to identify, contact, or bring legal action against persons or entities who may be causing harm to You, us, or others;
- it is necessary because of official inquiry of governmental authorities;
- it is necessary securing compliance with law's provision or with requirements of judicial proceedings concerning us;
- we may also disclose information when we believe the law requires it.

5. ACCESS OR CORRECTIONS TO YOUR INFORMATION

5.1. You are able to rectify, update or change Your personal data provided to us in Your account, except the e-mail address. E-mail address is a unique identifier in our system and it cannot be changed. Unfortunately, if You want to use our Website with another e-mail You need to register again on our Website. If You did not register an account on our Website, but You have reasons to believe that we have Your personal data, please, contact us in our contact form on Website.

5.2. You may request us to delete Your personal data from our database. You may also opt out of receiving promotional communications from us at any time by following the instructions in those communications. If You opt out, we may still send You non-promotional communications, such as technical notices, support or administrative notifications or information about changes to the Privacy Policy and using services on our Website.

5.3. You have other rights, which are provided to You by data protection law, including but not limited to: to request access and have free access to Your personal data that have been provided to You and that have been subject to processing; to restrict processing of Your personal data; right to revoke any consent given to the processing of personal data at any time; object to processing based on the balancing of legitimate interests; right of appeal to the competent data protection supervisory authority; to be aware of the amendments made to the terms of Privacy Policy in an efficient manner before the implementation of new amendments or, otherwise, of the new information processing policy; to have easy access to the text of Privacy Policy and its amendments and etc.

5.4. If You have any request, complaint or claim to us in relation to processing of Your personal data by us, please, send us a message in our contact form on Website (if You have registered account on our Website, You can do it there). Your message must contain:

- Your designation (if applicable), for example, advertiser or publisher;
- Your name and e-mail address;
- description of the facts that give rise to the request, claim or complaint and the purpose sought (update, correction or deletion, or fulfillment of duties).

Before answering the claim, we shall verify Your identity and find Your personal data in our database. If the claim or information provided is incomplete, we will request additional information for Your identification, which shall be provided by You within 5 days of receipt of the claim to remedy the failures. If You fail to submit the required documentation or information within 5 days of the date of the initial claim, You shall be deemed to have waived the claim. Once Your request has been received with complete information, the 15 days' term will start again. When it is not possible to answer Your request within such term, we will inform You about the reasons for the delay and of the date when Your request will be dealt with, which in no case may exceed 30 days following the expiration of the first term.

5.5. If You want to delete Your account, please contact us at Your account. If deletion is not possible for legal reasons, access to the data in question shall instead be blocked. Please note, however, that we may be unable to continue offering some or all of the services provided on our websites requiring registration in the event that Your data is deleted or blocked.

6. COOKIES FILES

6.1. A cookie is a small file which asks permission to be placed on Your computer's hard drive. Once You agree, the file is added and the cookie helps analyze web traffic or lets You know when You visit a particular site. Most web browsers are set to accept cookies as a default. You may wish to opt out by turning off cookies (please refer to the help menu on Your browser), however, please, note, that if You do so, You may not be able to use the full functionalities of this website. There is an option to change Your settings collectively for various providers under preference management on «Your Online Choices».

7. THIRD-PARTY LINKS

7.1. The Website may contain links to websites operated and maintained by third parties over which we have no control. Any information You provide to third party websites will be governed under the terms of each website's privacy policy and we encourage You to investigate and ask questions before disclosing any information to the operators of third party websites. We bear no responsibility or liability whatsoever for the content, actions, or policies of third party websites. The inclusion of third party websites on our Website in no way constitutes an endorsement of such websites' content, actions, or policies. Please, check third-party's policies before You submit any personal data to these websites.

8. PROTECTION OF MINORS

8.1. Persons under 18 years are excluded from our services and from providing any personal information without the consent of their parents or guardians. We do not request personal information from children and adolescents. We do not knowingly gather or collect such data and do not disclose it to third parties. If, however, we become aware that personal data regarding a child under the age of 18 has been collected on the Website we will make reasonable efforts to delete it from our records immediately.

9. GDPR CLAUSE

9.1. In operating the website chocopay.io in the EU countries, Chocopay processes data as a controller (as such terms are defined in the General Data Protection Regulation (GDPR)). As a controller, Chocopay is committed to fulfill data subjects' («Users») GDPR rights.

9.2. If You are EU resident, You may:

- access the data that Chocopay keeps about You. Chocopay may need to ask You to provide us certain credentials to make sure that You are who You claim You are. If You find that the data is not accurate, complete or updated, then You may provide us with the necessary information to rectify it;
- contact us if You want to withdraw Your consent to the processing of Your personal information. Exercising this right will not affect the lawfulness of processing based on consent before its withdrawal;
- request to delete or restrict access to Your personal information. Chocopay may postpone or deny Your request if Your personal information is in current use for providing the services or due to other legitimate purposes, such as compliance with regulatory requirements associated with Chocopay

9.3. If You exercise one (or more) of the above-mentioned rights, in accordance with the provisions of applicable law, You may request to be informed that third parties that hold Your personal information, in accordance with Privacy Policy, will act accordingly.

- You may ask to transfer Your personal information in accordance with Your right to data portability;
- You may object to the processing of Your personal information for direct marketing purposes;
- You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning You or similarly significantly affecting You;
- You have a right to lodge a complaint with a data protection supervisory authority.

9.4. If You have any concerns about the way Chocopay process Your personal information, You are welcome to contact to Chocopay by email info@chocopay.io. Chocopay will look into Your enquiry and make required efforts to resolve Your case.

9.5. Chocopay is committed to assist its controllers to fulfill data subjects' GDPR rights. Therefore, if You wish to exercise Your rights under the GDPR or have any questions in this matter, please contact the relevant Chocopay controller directly. When needed and upon request, Chocopay will assist its controllers. Chocopay conducts periodical assessments of its data processing and privacy practices to ensure that it complies with Privacy Policy, update the Policy when necessary, and ensure that the Policy is properly displayed and accessible.

9.6. The Chocopay may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Chocopay is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Chocopay;
- processing is necessary for the purposes of the legitimate interests pursued by the Chocopay or by a third party.

In any case, the Chocopay will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

9.7. Personal Data collected for purposes related to the performance of a contract between the Chocopay and the User shall be retained until such contract has been fully performed. The Chocopay may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Chocopay may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

10. MODIFICATIONS TO POLICY

10.1. The Privacy Policy may be amended from time to time. We reserves the right to change the Privacy Policy at any time. Any changes to the Privacy Policy will be effective immediately upon posting the latest version on our Website. If You disagree with the changes in our Privacy Policy, please do not use the Website after the posting of such changes online and ask us to terminate the processing of Your personal data. By using the Website following the posting of changes to the Privacy Policy, You agree to all such changes.

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