

Circle Privacy Policy

Effective date: 11.12.2023

1. Terms

1.1. In order to preserve the confidentiality of information and data of Users, not to violate intellectual property, trade secrets and confidential information, the Contractor and the User accept this Privacy Policy of Circle (hereinafter referred to as the "**Policy**"), which is Appendix No. 2 and an integral part of the General Terms and Conditions of Service Circle (hereinafter referred to as the "**Order**") and its and the Agreement concluded on the basis of the Order between the User and the Contractor.

1.2. All capitalized terms in this Policy have the same meaning as in the Procedure, unless otherwise expressly defined in this Policy.

2. User data available to the Contractor

2.1. From time to time, the User may transfer the following data to the Contractor for processing and storage (hereinafter each separately and all together - "**Client Information**"):

- 1) When registering and creating a Circle account, the User specifies an email address and password. The user also indicates his name and/or nickname (nickname), if necessary. For account security and access to certain Circle services, the User can provide his mobile phone number. In some cases, payment details / payment card data of users may be required, which are transferred directly to payment services in the order and under the conditions defined below;
- 2) In the case of contacting the Contractor by mail or courier service, the User indicates the surname, first name, patronymic of the natural person, the name of the legal entity, the address of the place of residence / location, the essence of the issue with which the User is contacting the Contractor. Such an application must be signed by the User indicating the date, as well as the basis for authorization, if the person acting on behalf

of the User is a representative or official of the User, while a copy of the document confirming the authorization must be attached to the application;

- 3) In the case of contacting the Contractor through the e-mail address, the User indicates the surname, first name, patronymic of the natural person, name of the legal entity, address of residence / location, the essence of the issue with which the User is contacting the Contractor, as well as the e-mail address to which the applicant an answer may be sent, or information about other means of communication with him. Such an appeal must be signed by the User with an indication of the date. The use of an electronic digital signature is not required when sending an electronic application. If the person acting on behalf of the User is a representative or an official of the User, the basis for the authority must be indicated in the application and a copy of the document confirming the authority of such a signatory must be attached to the application.

3. Consent to the transfer of Customer Information

3.1. By agreeing to join the Policy during registration, the User consents to the use of Customer Information, its processing and storage by the Contractor, as well as its transfer to third parties, as provided for in this Policy.

4. Purpose of using Customer Information

4.1. The Client's information is used to fulfill the Contractor's obligations to the User. The User agrees to the transfer of his data to the Contractor for the purpose of fulfilling the Contracts concluded and the obligations accepted by the Contractor in accordance with them for the provision of Services and the delivery of their results to the User, as well as for the purpose of advertising and providing new offers to the User. The User is also aware that the disclosure of Customer Information may be required in accordance with the current legislation of Ukraine.

5. Cookies

5.1. One or more cookies may be sent to the device from which the User accesses the Website, which are used to improve the quality of the service and the Contractor's Services, including to save the User's settings, track trends characteristic of the User, for example, the most popular pages. The performer may

also use cookies for advertising purposes, as well as transfer them, including cross-border, to manage ads on sites across the Internet.

6. Visit information

6.1. When accessing the Website through a browser, Application or using any other software, servers may automatically record and transmit certain information for the purpose of fulfilling the Agreements concluded between the Contractor and the User, including: IP addresses, type and language browser, date and time of request, as well as one or more cookies.

7. Emails and messages of the User

7.1. The User's messages are stored by the Contractor for the processing of requests, answers to questions and the future improvement of the Services and the Contractor's Care Service.

8. Third-party services, software and websites

8.1. Some Services of the Contractor are from time to time connected with other sites or their services, including such as payment or advertising services, services for creating accounts using Google, Facebook, Apple accounts. Personal information that the User provides to such sites and/or services may be transferred from them to the Contractor and vice versa. The Contractor processes such Customer Information in accordance with this Policy.

8.2. Software developed by third parties that can be used in the Application, including for payment services, collects and processes information in accordance with its own privacy policy.

8.3. The Client makes payment by bank card through the service provided by special financial institutions that ensure a high level of protection of the Client's data in accordance with their own privacy policy, which can be found on their official website.

8.4. In any event, this Policy applies solely to the Application, the Website does not control third-party sites, including those that use information from the Application or the Website or are linked to in the Application or the Website. These

sites may place their own cookies on the User's computer, collect data or request personal information from the User.

9. Notification of the Executor

9.1. By providing information, the User consents to receiving informational and advertising messages from the Contractor. These messages may from time to time contain information about new services, discounts and news of the Contractor. The user can unsubscribe from the newsletter at any time by informing about his unwillingness to receive the newsletter by contacting the Contractor at the address info@circle.com.ua .

9.2. Notifications will be sent in the form of an e-mail to the User's e-mail address, which he specified when ordering the Services or contacting the Contractor.

10. Other cases of using Customer Information

10.1. In addition to the above, Customer Information may from time to time be used for one or more of the following purposes:

- Support, protection and improvement of the Application and Website;
- Development of new services and services for Users;
- Protection of the rights of the Contractor, his partners and Users.

10.2. Before using the Client's Information for another purpose, the Contractor will request permission for such use.

10.3. The Contractor from time to time processes Customer Information on its own or contracted servers in various countries of the world and in some cases the Customer Information is processed outside the country of operation of such Contractor.

11. Transfer of Customer Information to third parties

11.1. The Contractor does not disclose the Client's Information to third parties who are not related to the provision of Services or the Contractor's activities, except when the User has granted the Contractor the right to full use of the Client's Information without restrictions.

11.2. The Contractor may provide the Client's Information to third parties who are not related to the provision of Services or the Contractor's activities, for the purpose of fulfilling the Contracts and the Contractor's obligations to provide the Services and deliver the results of the Services provided for by them.

11.3. The Contractor may provide the Client's Information for processing to its affiliates or direct service providers for the purpose of fulfilling the Contracts concluded with the Client and/or providing information to the Users regarding the activities of the affiliates.

12. Protection of information

12.1. The Contractor shall take all necessary measures to protect the Contractor and Users from unauthorized attempts to access, change, disclose or destroy the data stored by the Contractor, including but not limited to:

- the use of SSL encryption in the operation of certain services through which the Client's Information is transmitted;
- checking and improving the processes of collecting, storing and processing Client Information;
- checking and improving the security measures of the Application, the Website;
- granting access to the Client's Information only to those employees, executors, contractors and agents who need to have this information for the execution of Contracts with Users, the proper performance of the Services and the transfer of their results to the Clients with the mandatory obligation of such persons not to disclose the information received by them. Non-fulfilment by such persons of their obligations to maintain the confidentiality of the Client's Information leads to liability on their part, including disciplinary and criminal.

13. Other User Rights

13.1. Given the fact that everyone has their own views on privacy, each User independently decides on granting the Contractor the right to full use of the Client's Information in accordance with the Law of Ukraine "On the Protection of Personal Data", while he can independently choose the following restrictions:

- Prohibit the reception of cookies on your own device, from which the Website is visited, or set a notification about this data;
- Refuse to order Services through the Application if the Client does not agree to the processing of his Client Information by the Contractor's service.

13.2. The Client always has the right to contact the Contractor with a request to delete, change or supplement the Client's Information, provided that such Client fully fulfills the Agreement and fulfills all obligations under it, unless their storage is required by law or is determined by the customs of business turnover or business purposes. In most cases, when the Contractor provides access to and the ability to correct Customer Information, this is done free of charge, unless significant effort is required. In some cases, at the request to change the Customer's Information, the Contractor may ask the Customer to provide documents that allow identification of the User's identity and to confirm the information to be changed or deleted. The user is hereby also informed that after deleting information from active servers, it may be stored for a limited period in backup systems until final deletion, which is due to the technical features of the functioning of the Contractor's services and servers.

14. Compliance with Ukrainian legislation and privacy standards

14.1. The Contractor complies with the requirements of the Law of Ukraine "On the Protection of Personal Data" and provides access to the information specified by the User in the Application or on the Website, stores, uses, discloses the specified information only in cases provided for by the current legislation of Ukraine, including: at the request of state authorities, as part of a legal process or investigation, for the purpose of preventing fraud, violation of the law, as well as for the purpose of security and protection of the rights of the Performer and in other cases provided by law.

14.2. The Contractor adheres to the principles and privacy standards adopted in Ukraine regarding the notification, collection, transfer, security, integrity of data and access to them, regularly checks the implementation of this Policy by all persons to whom it may apply, as soon as possible eliminates any identified problems, properly and responds in a timely manner to official complaints from Clients regarding this Policy, having previously contacted the Client personally.

15. Change of this Policy

15.1. The Contractor may independently change this Policy, about which he must notify Users who have joined the Procedure (accepted its conditions) through the personal account of the Application. This Policy and any Agreement with the User shall be considered modified in accordance with such changes from the moment the User is notified of such changes in accordance with the provisions of the Procedure. If the User does not agree with the specified changes, the User can abandon the Application and delete it. If the User has not deleted the Application within 3 (three) days from the moment of receiving the notification about the change

of the Policy, it is considered that such User has agreed to the new version of the Policy.

15.2. The user can always read the current version of the Rules on the Internet at the following address: <https://circle.com.ua/en/Terms-and-Conditions-Circle-ENG.pdf>.

15.3. For any questions regarding this Policy, please contact the Care Service or at: <https://circle.com.ua/en/Privacy-Policy-Circle-ENG.pdf>.