

# PRIVACY POLICY

The version dated January 1st, 2022

- **Who we are and what this document is about**

We are Revicom LTD., a Cyprus company, located at Georgiou Katsounotou, 6, Limassol, 3036 Cyprus ("Revicom" "We", "Us" or "Our"). You can address us via e-mail [info@revicom.ltd](mailto:info@revicom.ltd).

This Privacy Policy is a document that explains what kind of Your personal data we use, how exactly do we use it, for what reasons do we need your personal data and what rights do you have concerning Your personal data.

The term "personal data" (hereinafter also referred to as "user data", "data") is used within the meaning outlined in the General Data Protection Regulation (hereinafter also referred to as "GDPR"), taking into account existing international practices on personal data protection in countries that provide an adequate level of such protection. It includes any Your information that relates to or identifies you directly or indirectly.

- **What we developed this document for**

We developed this document to provide You with essential information concerning the personal data we collect through our website <https://www.revicom.ltd>, hereinafter we will refer to it as "Website" for short, meaning the website in which this privacy policy is placed. By using or accessing the Website, You confirm that You have read, understood and accepted this Privacy Policy. Please ensure You have read it carefully, and particularly the section detailing Your rights about the personal data that we collect about You. If You do not agree with our Privacy Policy, You should not use the Website.

The purpose of this document is to explain what kind of personal data we use, how exactly do we use it, for what reasons do we need Your personal data, and what rights do You have concerning Your personal data.

Here are the basic provisions on how Revicom views data privacy:

- We do not collect any data without your consent, legitimate interest or performance of our contract with You;
- We collect any data only on lawful ground;
- We collect only a minimum amount of information, only what is needed for the performance of a contract or to take steps before entering into a contract or protect our legal interest;
- We do not monetize Your data;
- We do not check the user information received from you, except where such a check is necessary in order for us to fulfill our obligations to You;
- We process Your personal data as transparently as practically possible.

By providing access to our Website, we, acting reasonably and in good faith, believe that you:

- (a) have all necessary rights to use our Website;
- (b) provide true, accurate, current and complete information about yourself;
- (c) are at least 16 years of age or under the minimum age in the relevant territory or your parents agree that you use our Website;
- (d) are aware of and accept this Privacy Policy.

- **Why we collect personal data and for what purposes**

We collect personal data for specific purposes and we'll use the collected data for the specified purposes alone.

The purpose of the personal data we collect is so we can perform a contract, take steps before entering into a contract or protect our legal interest. Personal data can also help us to improve our products to fit the needs of our customers.

All the personal data we process is lawfully obtained and on a legal basis.

If our relationship between us and You changes, we may need more information. For example, if You fill out a form to request more information about one of our products, we'll use Your contact data to send the requested product information to You. If You then decide to become a customer, we'll need additional information including Your billing address for the purpose of providing You with the services You are interested in.

Here's a list of the purposes for which we'll request or use Your data:

- Sharing relevant information about our products and services;
- Analyzing the usage of our Website;
- Detecting and combating fraudulent or unlawful activity;
- Training and quality improvement of Website.

We will normally collect personal data from You only where we have Your consent to do so, where we need the personal data to perform a contract with You, or where the processing is in our legitimate interests and not overridden by Your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect the personal data.

If we ask You to provide personal data to comply with a legal requirement or to perform a contract with You, we will make this clear at the relevant time and advise You whether the provision of Your personal data is mandatory or not (as well as of the possible consequences if You do not provide Your personal data).

Similarly, if we collect and use Your personal data in reliance on our or a third party's legitimate interests and those interests are not already listed above, we will make clear to You at the relevant time what those legitimate interests are.

If You have questions about or need further information concerning the legal basis on which we collect and use Your personal data, please contact us using the contact details provided in Section 11 below.

- **What personal data we collect**

We never collect more data than we need and may ask for additional data at the appropriate time. Personal data we collect includes three main categories when You use our Website:

Depending on our relationship the personal data we collect when You use our Website may include:

Potential customer information:

- Full name;
- Email address;
- Phone number;
- Information about region and company.

Website visitor data:

- IP addresses;

- Location-related information;
- Pages visited;
- Browser and device information.

Website visitor data is information about visitors of our Website such as Your domain name, host from which You access the Internet, the IP address of Your computer, and Your browser software and operating system. This information may be aggregated to measure such things as the number of visits, average time spent on the site, number of pages viewed, and methods by which our site was found.

#### Special category data

Certain categories of personal information have additional protection under the GDPR. The categories include information about your health, racial or ethnic origin, etc.

We inform you, that Revicom does not store or process such a special category of your personal data.

#### • **Using cookies**

Cookies are small text files that websites often store on computer hard drives or mobile devices of visitors to their websites. A cookie contains a unique number, which is used to recognize your computer or mobile device when you return to our Website. Cookies can remain on your computer or mobile device for different periods of time. The cookies can be either “persistent” cookies or “session” cookies. Persistent cookies are stored by a web browser and remain valid until a set expiration date. Session cookies only exist while your internet browser is open and are automatically deleted once you close your browser.

Web beacons are small electronic files contained on pages of websites that permit companies to count users who have visited certain webpages on a website and are used for other related website statistics (e.g., recording the popularity of certain website content and verifying system and server integrity).

The use of cookies is designed to make the Website work correctly.

We use a variety of cookies for different purposes. Specifically, we use cookies to enhance the experience of our visitors to our Website and to better understand how the Website are used. Cookies may tell us, for example, whether you have visited the Website before or whether you are a new visitor.

We also use cookies to prevent unlawful actions performed by malicious software.

There are several categories of cookies that we may use. Specifically:

- Essential and security cookies, web beacons and other tracking technologies are necessary for the operation of the Website. These tracking technologies enable you to move around on the Website and use the Website’s features. You may not opt-out of these types of cookies because they are required to operate the Website and service.
- Analytics cookies, web beacons and other tracking technologies collect information about how you have used the Website. These items help us to understand how Website performs, how visitors interact with the site, and whether there may be technical issues. This storage type usually doesn’t collect information that identifies a visitor.
- Personalization cookies web beacons and other tracking technologies. These items allow the Website to remember choices you make (such as your user name, language, or the region you are in) and provide enhanced, more personal features. We use personalization cookies, web beacons and other tracking

technologies to improve the user experience with our Website.

- Marketing cookies, web beacons, and other tracking technologies are used on our Website by third-party service providers. These cookies help measure the effectiveness of our advertising campaigns. They are used to make advertising more relevant to your preferences as well as to analyze Website visits and ad conversions from third-party websites.

The table below lists of cookies used by Revicom and third-party service providers. The list of cookies and third-party service providers is subject to change at any time:

Who serves cookie	What it does	More information
Google Analytics	Google Analytics uses cookies that help website owners understand how their visitors engage with their properties. It may use a set of cookies to collect information and report website usage statistics without personally identifying individual visitors to Google. Security cookies are used to authenticate users, prevent fraudulent use of login credentials, and protect user data from unauthorized parties	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a> <a href="https://policies.google.com/technologies/types?hl=en">https://policies.google.com/technologies/types?hl=en</a>
Facebook	Facebook uses cookies on other websites and apps that have Facebook Products (including the Like button or other Facebook Technologies). Cookies enable Facebook to offer the Facebook Products to its' audience and to understand the information it receives about users, including information about their use of other websites and apps. Security cookies are used to identify browsers for purposes of security and site integrity.	<a href="https://www.facebook.com/policies/cookies/">https://www.facebook.com/policies/cookies/</a>

It is your choice as to whether or not to accept cookies. Most browsers allow you to configure the browser settings so that cookies from websites cannot be placed on your computer or mobile device. If you choose not to accept cookies, then you may be able to continue browsing our Website, but we may not be able to provide you with certain features.

Please note, If cookies are blocked, the website will malfunction.

- **Transfer and storage of Your personal data**

Personal data we collect may be stored and processed for the purposes set out in this Privacy Policy in any country in which we operate and Your personal data may be transferred, stored, and processed by recipients in various countries around the world where our servers are located and our databases are operated. We do all necessary to make sure all recipients of Your personal data understand the necessity to process personal data only on a legal basis taking into account any and all applicable legislation.

Our servers are located in the European Economic Area (EEA).

We may transfer Your personal data to the following third parties categories:

- any third party to whom we assign or novate any of our rights or obligations under a relevant agreement;
- any national or international regulatory, enforcement, exchange body, central or local government department and other statutory or public bodies or court where we are required to do so by applicable law or regulation at their request;
- third parties if You expressed Your consent to such transfer or transfer of Your Personal Data is required for Your use of a certain services or performance of a particular agreement or contract with You;
- third parties involved in the fulfillment of our obligations to perform services (including hosting providers, etc.).

We may transfer and store Your personal data to third-party data processors located in countries outside of the European Economic Area (EEA). We only transfer Your personal data to those third parties where we can be sure that we can protect Your privacy and Your rights, for example, the third party is located in a country which the EU has deemed to have adequate data protection laws in place or to a country which has not been recognized by the European Commission as providing an adequate level of personal data protection but where we have a contract in place with that third party which includes the European Commission's standard data protection clauses.

- **How we protect Your personal data**

We apply a variety of measures to safeguard the collection, transmission, and storage of the information we collect. These measures vary based on the sensitivity of the information that we collect, process, and store and the current state of technology. Even so, no security measure is 100% perfect. Therefore, while we strive to employ reasonable protections for Your information that are appropriate to its sensitivity, we cannot guarantee the security of Your information and do not assume any responsibility for the unauthorized use or access to Your information under our control.

Notwithstanding the foregoing, to protect Your personal data we have the physical, electronic, and procedural means of protection in accordance with international standards. We use encryption to keep Your data confidential during transfer. We review, verify and update our methods for collecting, storing, and processing information, including physical security measures, to prevent unauthorized access to our systems. We restrict access to personal data to our employees who need this information to process it. Anyone who has such access is subject to strict contractual obligations regarding confidentiality and may be subject to disciplinary action if he does not fulfill these obligations.

- **Your rights in relation to personal data**

You have many rights over your personal information and how it is used. Here are

set out the major rights, which are available to you (depending on how we collected your personal data) and how to make use of those rights:

- **Right to access Your personal data:** at any time, You can ask us about what Your personal data do we have, what do we do with them, why do we process them, who we have told about You, etc. You also can ask us to give You a copy of the personal data processing, if You like. To request access, send us an email at mail [info@revicom.ltd](mailto:info@revicom.ltd) headed "Subject Access Request";
- **Right to rectify Your personal data:** at any time, You can request that we update, block or delete Your personal data if the data is incomplete, outdated, incorrect, unlawfully received or there is no need to proceed it anymore. If you do not provide correct personal data, we may suspend access to our services due to the lack of necessary data;
- **Right to erasure:** at any time, You can ask us to delete all the personal data that we have about You – it is Your right to be forgotten, like if we have never met before. If You do so, You will no longer have access to the our services. However, we have the right not to erasure Your personal data and process it insofar as the processing is permitted by the applicable law on personal data (including, but not limited to, the purposes of settling claims and disputes, sending responses to requests from state authorities);
- **Right to restrict the use of Your personal data:** for example, if You think, that Your personal data is not accurate and we need time to check it, we can make a pause in processing Your personal data enough to clarify, is it so or not;
- **Right to object to the processing of Your personal data:** at any time, You can tell us to stop and we will no longer process Your personal data, but we can still keep them if there is legitimate ground for that. If You do so, You will no longer have access to the our services;
- **Right to data portability (in certain specific circumstances):** if You wish, You can ask us to download (export) all personal data that we have in the format acceptable to give it to someone else or ask us to give them Your data directly;
- **Right not to be subject to an automated decision:** if we process Your personal data automatically and we make some decisions according to it, and it affects You in any serious way, You can express Your point of view and contest such a decision. But in reality, we do not do this;
- **Right to lodge a complaint with a supervisory authority:** You always can complain about us and about the way, we are processing Your personal data. Before we process any request, we may ask You for certain information in order to verify Your identity. Where permitted by local law, we may reject requests that are unreasonable or impractical. We will respond to Your requests in a reasonable timeframe.

If you are a resident of the European Union, you have data protection rights no less than what is specified by GDPR.

- **Retention periods**

We will retain Your personal information for as long as required to perform the purposes for which the data was collected depending on the legal basis for which that data was obtained and/or whether additional legal/regulatory obligations mandate that we retain your personal information during the term that is required and/or permissible under applicable/relevant law.

Also we may keep information that how do we think we may need to resolve any disputes, enforce our agreements with You and provide You a possibility to use our

products, protect our or Your legal rights, and comply with technical and legal requirements and constraints related to the security, integrity, and operation of our products.

- **Changes to our policy**

We may update this policy from time to time. New version of this policy will be published on our Website. We recommend you regularly review this page to ensure that you are always aware of our information practices and any change. Also we may notify you via any applicable communication channels.

Your continued use of our Website means that You accept and agree to the changes.

- **Contact us**

If You have a complaint or question about this policy, if You would like to make a request concerning Your personal data, withdraw Your consent, You may at any time contact us at mail [info@revicom.ltd](mailto:info@revicom.ltd). We will aim to respond to You within a maximum of 30 calendar days from receipt of the request.

All correspondence received by us from You (written or electronic inquiries) is classified as restricted-access information and may not be disclosed without Your written consent. The personal data and other information about You may not be used without Your consent for any purpose other than for response to the inquiry, except as expressly provided by law.