

Privacy Policy

General Provisions

VENBEST ("we," "our," or "us") is committed to protecting your privacy and ensuring the security of your personal data. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our website, engage our services, or otherwise interact with us. We are dedicated to complying with applicable data protection laws, including the General Data Protection Regulation (GDPR). This policy applies globally to all VENBEST operations. The Company undertakes to comply with applicable Ukrainian legislation on personal data protection, in particular the Law of Ukraine "On Personal Data Protection."

Principles of Data Processing

We adhere to the following principles when processing your personal data:

- **Lawfulness, Fairness, and Transparency:** We process data lawfully, fairly, and transparently.
- **Purpose Limitation:** We collect data for specified, explicit, and legitimate purposes.
- **Data Minimization:** We collect only data that is adequate, relevant, and limited to what is necessary.
- **Accuracy:** We keep data accurate and up to date.
- **Storage Limitation:** We retain data only as long as necessary.
- **Integrity and Confidentiality:** We protect data using appropriate security measures.
- **Accountability:** We are responsible for demonstrating compliance with GDPR.

Information We Collect

We collect the following types of personal data:

- **Identity Data:** Name, title, username, or similar identifier.
- **Contact Data:** Billing address, delivery address, email address, and telephone numbers.
- **Financial Data:** Bank account and payment card details.
- **Transaction Data:** Details about payments to and from you and other details of services you have purchased from us.
- **Technical Data:** Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
- **Profile Data:** Username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- **Usage Data:** Information about how you use our website, products, and services.

- **Marketing and Communications Data:** Your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Personnel Data:** For employees and contractors, we collect additional information such as employment history, qualifications, and background check information

How We Collect Your Data

We collect data through:

- **Direct Interactions:** You may give us your Identity, Contact, and Financial Data by filling in forms or by corresponding with us by post, phone, email, or otherwise.
- **Automated Technologies or Interactions:** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions, and patterns.
- **Third Parties:** We may receive personal data about you from various third parties such as analytics providers (e.g., Google Analytics), advertising networks, and search information providers.

Legal Basis for Processing

We process your personal data based on one or more of the following legal bases:

- **Consent:** You have given us explicit consent to process your data for a specific purpose. You have the right to withdraw consent at any time.
- **Contract:** Processing is necessary for the performance of a contract with you or to take steps at your request before entering into a contract.
- **Legal Obligation:** Processing is necessary for compliance with a legal obligation to which we are subject.
- **Legitimate Interests:** Processing is necessary for our legitimate interests or the legitimate interests of a third party, provided those interests are not overridden by your rights and interests. Our legitimate interests include providing security services, managing our business, and improving our services.

Purposes of Processing

We use your personal data for the following purposes:

- To provide and manage our security services.
- To process payments and manage invoices.
- To communicate with you, including responding to inquiries and providing customer support.
- To personalize your experience on our website.
- To improve our website and services.
- To send you marketing communications (where you have opted in).
- To comply with legal and regulatory obligations, including ICoCA and ISO 18788 requirements.
- To conduct background checks and vetting of personnel, in accordance with security industry standards.

Data Sharing and Disclosure

We may share your personal data with:

- **Service Providers:** Third-party service providers who provide services such as payment processing, data analytics, email delivery, hosting services, and customer support. We ensure these providers are GDPR compliant and have appropriate safeguards in place.
- **Business Partners:** Partners with whom we collaborate to provide services.
- **Legal Authorities:** When required by law or legal process, we may disclose your data to law enforcement agencies, government authorities, or other third parties.
- **ICoCA and Certification Bodies:** To comply with our obligations under the International Code of Conduct for Private Security Service Providers and ISO 18788, we may share information with relevant oversight and certification bodies.

International Data Transfers

Your personal data may be transferred to, and processed in, countries outside the European Economic Area (EEA). We will ensure that any such transfers are subject to appropriate safeguards, such as:

- **Adequacy Decisions:** Transfer to countries that have been deemed to provide an adequate level of protection by the European Commission.
- **Standard Contractual Clauses:** Use of standard data protection clauses adopted by the European Commission.
- **Binding Corporate Rules:** Implementation of binding corporate rules approved by a data protection authority.

Data Security Measures

We implement appropriate technical and organizational measures to protect your personal data against unauthorized access, disclosure, alteration, or destruction. These measures include:

- Encryption of data in transit and at rest.
- Access controls and authentication protocols, including multi-factor authentication.
- Regular security audits and vulnerability assessments.
- Employee training on data protection and security best practices.
- Physical security measures to protect our facilities and infrastructure.
- Incident response plans to address data breaches or security incidents.

Data Retention

We will retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process your personal data, and the applicable legal requirements.

Your Rights

Under the GDPR, you have the following rights regarding your personal data:

- Right to Access: You have the right to request access to your personal data and information about how we process it.
- Right to Rectification: You have the right to request that we correct any inaccurate or incomplete personal data.
- Right to Erasure: You have the right to request that we erase your personal data under certain circumstances.
- Right to Restriction of Processing: You have the right to request that we restrict the processing of your personal data under certain circumstances.
- Right to Data Portability: You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit that data to another controller.
- Right to Object: You have the right to object to the processing of your personal data under certain circumstances, including for direct marketing purposes.
- Right to Withdraw Consent: If we are processing your data based on consent, you have the right to withdraw your consent at any time.
- Right to Lodge a Complaint: You have the right to lodge a complaint with a supervisory authority if you believe that we have infringed your data protection rights.
- To exercise these rights, please contact our Data Protection Officer at dpo@venbest.com.ua

Cookies and Tracking Technologies

We use cookies and other tracking technologies on our website. Please refer to our Cookie Policy for more information.

Changes to This Privacy Policy

We may update this Privacy Policy from time to time. We will notify you of any significant changes by posting the new policy on our website and, where appropriate, by sending you an email.

Contact Us

If you have any questions or concerns about this Privacy Policy or our data protection practices, please contact us at:

Email: office_n@venbest.com.ua

Phone: 0800202980

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Vadym Olianishyn
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