

## Privacy policy

Last updated: 09/02/2021

### **1. INTRODUCTION**

1.1. Our privacy policy sets out how MOBIBLIS LTD processes Your general, personal, and corporate information, mainly used to provide its unique services. It tells You in detail which important and relevant data and why are processed in a certain order by Our specialists in the legal and financial departments.

1.2. This document directly refers to targeted consumer services provided by MOBIBLIS LTD, described in detail on the website <https://mobiblis.com/> (hereinafter the “Site”) of MOBIBLIS LTD company, under company number No. HE422780, whose office address is Agias Zonis & Thessalonikis, Nicolaou Pentadromos center, block B, office 503A, 3026, Limassol, Cyprus, in accordance with the law.

1.3. Consumer data means that any important user data that belongs to the consumers of MOBIBLIS LTD as individuals include: place of residence and registration certificate, unique passport number of the resident country, name, personal identification code assigned by the tax service, surname, series of documents and place of issue, indicating both the department and the code of the organization that issued the final document. It does not apply to information that is unreliable and hidden from prying eyes since it cannot be found, processed, and therefore used to check the reliability and relevance of information about a person.

1.4. By agreeing to the above and below stated conditions, You automatically authorize Us to process and analyze personal data that will be used in any case, in accordance with the clauses of this document. If You have any important questions related to the methods of collecting, analyzing, and processing personal information, please contact Our qualified specialists, whose contacts are listed at the end of this current regulation with an agreement scrupulously drawn up by analysts and lawyers of the company and the contractor.

1.5. You can use the full range of services We provide only after reaching the age of majority, namely 16, 18, or 21 years old. If You are not an adult, We will conduct an investigation, as a result of which the account will most likely be

closed and removed from the customer base of the organization providing the services. When information about such participants appears, You are obliged to inform Us about them as soon as possible because hiding such information also imposes sanctions on the accomplice of the violation in order to further restrict access to the services provided.

1.6. By providing Your personal data, You completely agree to the analysis of Your data as a consumer and accept the terms of the agreement You read. If You are not satisfied with a certain point in the act, please notify Us, and We will stop providing services and terminate the contract.

1.7. The company has the full right to make changes that are important for the well-being of the organization in this document, in accordance with the updated provisions in the current legislation and the management apparatus of the country of registration. We will notify You about this using the contacts specified in Your profile or the feedback form.

## **2. HOW WE COLLECT INFORMATION**

2.1. MOBIBLIS LTD can and will analyze personal data necessary to process information and provide services, which includes:

2.1.1. Full name, personal email, place of registration, social media accounts, date and place of birth, personal contact phone number with a valid connection to the operator, gender, citizenship or permanent/temporary residence permit, and bank details where an account is opened for Your name or card number if it is open to You by a third party, which will be attached to Your account.

2.1.2. Identity documents: passport, driver's license, military ID, international passport, TIN, pension certificate.

2.1.3. The essence of Our communication in the exchange of information: We ask questions with clarifications, and You answer via email, calls, or in writing. Please note that We reserve the right to refuse further cooperation with You in the case of the provision of irrelevant information.

2.1.4. Information that comes in automatically. We also use analytical services providing both identification and general data. This data may not reveal Your identity and thus provide Your personal data. In particular, these can be: authentication data, device information, location, unique ID, and physical and virtual IP addresses. It is information collected directly by browsers, providers, operators, and external analytics services.

2.1.5. Data provided to Us by third parties. To collect information, any other sources are used that comply with legal regulations, among which there may be open databases with common access to data that include Your last name, first name, contact details, and banking history. We check the relevance of the data, but We do not take responsibility for its appearance on third-party resources before signing the agreement and this regulation.

2.1.6. Anonymization means hiding information or deleting it to prevent revealing or identification of personal information or connections with a specific person. We can use hidden data for analytics, marketing purposes, or detecting threats for Our company. We also have the right to refuse to provide You with services based on concealing important information (credit history, debts to government agencies, etc.) or because of the submission of inaccurate data.

2.1.7. By accepting the agreement, You confirm that You are a real and not a fictitious person, and You agree to comply with all clauses of this agreement and not violate it.

### **3. LEGISLATIVE REGULATIONS FOR PROCESSING YOUR DATA**

3.1. It is based on the legislative principles for the processing of personal information and personal data, necessary for:

3.1.1. Fulfillment of the terms of the agreement on Your part and the performance of the necessary actions on Our part before concluding the agreement, which includes:

- personal personal information about You as a client;
- an individual approach to implementing Your requirements for Our project;
- analysis of activities and information about financial transactions on Your accounts;
- notification of the necessary information on the client's account;
- increasing security, reducing the risks associated with fraud, security threats, eliminating mailings that harm personal data;
- customer account management;
- control over the quality of services provided by personnel.

3.1.2. The existing requirements necessary to fulfill the assumed obligations are based on managing risks that arise during interaction; providing a set of measures for personal identification; providing information about possible

fraud, unlawful benefits associated with illegal actions; transfer of data to the relevant competent authorities if it does not contradict the applicable law.

3.1.3. The analysis of the data necessary to protect Our interests includes the following complex steps:

- quality control and analysis of the information collected;
- Providing responses to incoming requests from authorized bodies during legal proceedings or taking action in procedural proceedings;
- solution of controversial issues that arise as a result of a certain activity;
- analysis of marketing research used in business management;
- prevention or elimination of possible risks that may arise when providing Our services.

3.1.4. Third parties shall accept the terms of the agreement. This paragraph is a prerequisite for Our privacy policy.

3.1.5. The use of advertising information is based on Our trust in You and mutual consent (promotions, advertising campaigns, newsletters, etc.).

#### **4. TRANSFER OF PERSONAL DATA**

4.1. The transfer of Your personal data in the presence of third parties is possible in the following cases:

4.1.1. If the contractual relationship is fully complied with, MOBIBLIS LTD reserves the right to transfer Your personal data to third parties who ensure the security of Your personal data and the availability of appropriate safety and confidentiality measures.

4.1.2. The company reserves the right to transfer information about You to law enforcement agencies following existing regulations according to the law.

4.1.3. Only with Your consent, Your personal data can be transferred to third parties.

4.1.4. In the event of changes to Our collective charter, You will definitely be notified that Your personal data will be transferred to a third party. A message about changes can be sent via electronic gadgets specified in terms of the agreement. The notification will contain information about the person responsible for the integrity of Your personal data.

#### **5. CONTROL OF PERSONAL DATA PROTECTION**

5.1. The confidentiality of Your personal data is of the highest value and priority to Us. Your personal data is stored as long as there are obligations specified in terms of the contract.

5.2. In the event of the termination of the relationship, all personal information that We have collected throughout the entire period will be deleted irrevocably. We reserve the right to destroy data that identifies You as a customer in a safe way. A situation may arise when the records must be kept for a long time (after You cease to be Our client) if this does not contradict the existing norms of the law.

5.3. MOBIBLIS LTD takes all necessary precautions to protect personal information from unlawful use, loss, unauthorized access, alteration, or risks associated with revealing You. But We cannot 100% guarantee that hacking, data loss, or other breaches will never occur.

## 6. PROTECTION OF YOUR PERSONAL DATA

6.1. As a Customer, You are the data subject and have the final right to Your personal data.

6.2. Your rights are as follows:

Your rights	Description
Access to information	The authenticity of the information provided, understanding how the data is processed, receiving a copy of what data is used. Knowledge of individuals and legal entities to whom We have provided access to Your data.
Changes	Changes are made when such data have been disclosed to third parties and have certain inaccuracies.
Deletion of personal data	The right to request the deletion of personal information from Our database so that the Service cannot

	continue to process, use, and store it, except as otherwise provided by law.
Restrictions on information processing	Information is processed only with Your full consent.
Data copying	The right to request a printed copy of the information provided for transferring it to another service provider or directly to a third party designated by You.
Data processing agreement	You can refuse to process Your data if it is not Your voluntary will.
Prohibition of processing	You can stop the processing of Your Personal Data by Us or by third parties who can access it.

6.3. Your rights are not limited to this list. To exercise certain rights, You must meet conditions and requirements specified in applicable law.

6.4. For more information on Your rights and responsibilities concerning Personal Data, please contact Our data protection officer. To exercise Your rights, please send a request to the address provided.

6.5. As a UK resident, You have the right to file a complaint with the Information Commissioner.

## **7. COOKIES**

7.1. MOBIBLIS LTD values Your trust, so to ensure a high level of service delivery and usability, We use cookies and similar technologies (SDK) in Our work. With these indispensable assistants, We can track Our customers' feedback with Our Service. Here We will analyze and consider the types of cookies that can be accepted when using Our Service, which will help to significantly improve them and control them as You wish.

7.2. A cookie is a small text file that, together with all data, is transmitted directly from the website to Your device and is stored there for a long time. Cookies store personal data such as a username and password for a social network. Cookies do not contain personally identifiable information such as

name, phone number, or bank account number. We use cookies in Our work in several ways to ensure that Your work is enjoyable. It contains the following:

- a) constant presence in the system;
- b) analysis and recording of Your frequently visited pages when using the Services;
- c) analysis of statistics on the exchange of information with existing services.

7.3. In Our work, We use the following files:

7.3.1. Strictly Registered Cookies. These cookies are mandatory in the operation of the Services and cannot be disabled in Our systems. Such files are installed only in response to Your actions, which are equal to CTAs, for example, setting privacy, logging in, or filling in a required field. It also includes cookies that We may rely on to prevent the risk of fraudulent activity. You can set Your browser to block or warn You about these malicious cookies, but it may cause problems with the website.

7.3.2. Analytical cookies. These cookies provide the ability to count visits and traffic sources as well as to measure and improve Our Services. They also help You find out which pages are more and less in demand today and allow monitoring customers on the website. All information is anonymous. If You do not consent to the use of these cookies, We will not know when You visited Our website, what services You used, and We will not be able to track the website's operation.

7.4. To manage cookies, You have the right to allow Your browser to completely prohibit the use of cookies or notify You personally about the download of cookies.

7.5. The following cookies are used:

Name	Offer	Is it a first-party or third-party cookie in local storage?
Strictly necessary cookies	These cookies are essential to provide You with the Services.	First-party
Analytics cookies	Data analysis	First-party

## **8. INTERNATIONAL RELATIONS IN THE FIELD OF PERSONAL DATA TRANSFER POLICIES**

8.1. We reserve the right to transfer data outside the UK/EU/EEA when We collect and share information about a specific customer. It is done only if You are a resident of this state.

8.2. The protection level in each country is different. In Our work, We apply the foundations [recognized by law](#) throughout the European Union, including the European Commission when carrying out international data transfers of data of UK/EU/EEA residents.