

# Privacy Policy

Date Last Modified: November 28, 2023

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we process your personal data when you visit our Website (the "Website") (regardless of where you visit from) and tell you about your privacy rights and how the law protects you.

Any information that is collected about visitors of the Website by User Cabinet is referred to as "User Information".

## Controller

User Cabinet, a legal entity incorporated under the laws of the Marshall Islands under registration number 115474 and with registered address at: Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Marshall Islands MH96960, is the Controller and is responsible for the operation of the Website.

If you have any questions about this Privacy policy, including any requests to exercise your legal rights, please send us a request via email [support@user-cabinet-mail.com](mailto:support@user-cabinet-mail.com).

The types of User Information we collect:

We may collect and process categories of data as follows, however, this list is not exclusive:

## Personal data:

- Personally identifiable information (first and last name, email address, telephone number, date of birth) only if you choose to fill out a "Contact Us" form, found on the Website or email us directly;
- Any other personal data that the User decided to share with us.

The above-mentioned data is collected on the base of a Users' consent or other legal basis presented below and in compliance with applicable laws, along with required filings with data protection authorities, where required. User can give consent to the processing of the personal while submitting the form on our website or sending the consent via email to [support@user-cabinet-mail.com](mailto:support@user-cabinet-mail.com).

## Non-personal data:

- Information on your visit to the Website, including but not limited to, traffic data, location data, IP address, browser type, and version, screen resolution, browser language, time zone, operating system, and type of device;
- Demographic information which indicates your age, gender, and country;
- Information from any research or surveys submitted by Website visitors within surveys (on a voluntary basis only) on various topics, including events and experiences, media consumption preferences, and how we can improve our Website;
- Information from the content of messages you submit through any of the fillable forms on the Website, such as feedback you write;
- Information from public postings, which is any information submitted to us to be displayed on the Website, including any communication/material you provide to be posted or consent to be posted to a publicly viewable area of the Website, such as a comment or a review. Please acknowledge and understand that you shall have no expectation of privacy or confidentiality with respect to the content you submit via the Website as a comment or review, whether or not your submission includes personal information.

User Cabinet does not collect and does not process any sensitive personal data (for example, social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership).

## User Information may be collected:

- When you provide information to us by filling in forms on the Website (i.e. registering for newsletters and updates, subscribing to User Cabinet's updates, etc.);
- When you complete surveys that we use for research purposes;
- When you decide to address us through any of the "Contact Us" forms on the Website or email.

This Policy only addresses what happens if you visit the Website and this Policy does not apply to information collected by User Cabinet offline or through any other means or any third party, including through any application or content that may link to or be accessible from or on the Website.

## Purpose of data processing:

We process the User Information for the following purposes:

- To respond to your inquiry/request;
- To improve the contents of the Website and its operation;
- To analyze information in order to improve the way we run our business and Website according to user preferences, to provide a better service and user experience;
- To comply with regulatory obligations (if any);
- To provide you with information in case you have signed up for any newsletter or to ask you/receive feedback;

- For other reasons, to the extent permitted by the law.

## Change of purpose

We will only use User Information for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Please note that we may process User Information without your knowledge or consenting the limited situations only where this is required or permitted by law.

## Third-party links

This Website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share User Information. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy policy of every website you visit.

### Retention of User Information

User Information will be deleted:

- once it is no longer needed to fulfill the purpose for which it was collected;
- once you request your Personal data to be deleted if the User Cabinet is not obligated legally to keep such data.

## Sharing and Disclosing User Information

User Cabinet may share your User Information with third parties located within the European Economic Area if:

- 1) required by law;
- 2) to allow the proper operation of the Website (for the purposes of servicing the Website, including providing customer service and marketing assistance, performing business and sales analysis, supporting the Website's functionality, surveys, and other features offered through the Website);
- 3) in case there is another legitimate interest.

Although unlikely, in certain instances we may be required to provide User Information in response to a court order or government investigation. We may disclose certain User Information when we believe that such a release is reasonably necessary to enforce or apply our Privacy Policy, to abide by the laws, where applicable, or to protect the interests and/or safety of User Cabinet. We may also share User Information in the event of a merger, restructuring, reorganization, dissolution, or other sale or transfer of some or all of User Cabinet's assets, liquidation, or similar proceeding, where applicable.

The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights and proper protection of our business against risks.

In case User Cabinet shares User Information with third parties, such third parties will be bound to use it only for the purposes for which we disclose it to them and in line with the consent that you have submitted with respect to your User Information and such third parties will be bound by the obligations related to User Information processing of the same level of data protection.

User Information will be shared with those employees, agents, and third-party providers on a need-to-know only basis and subject to a non-disclosure undertaking.

We reserve the right, and you hereby expressly authorize us, to share User Information in the cases listed above.

## Website Users' legal rights

User Cabinet wants to make sure you are fully aware of all of your data protection rights. Every Website User, consenting to the Terms of Use of the Website and this Privacy Policy, is entitled to the following:

- 1) The right to access;
- 2) The right to rectification;
- 3) The right to erasure;
- 4) The right to restrict processing;
- 5) The right to object to processing;
- 6) The right to data portability.

## Cookies Notice

User Cabinet uses a Web analytics service to analyze and monitor activity on the Website. Web analytics utilize cookies, which are files placed on the hard drive of your computer, tracking the way visitors use the Website.

We set the first-party cookies, which collect information like your language preference and login information, and third-party cookies, which are set by Web analytics and exist for marketing and advertising purposes.

Certain User Information is collected through enabling cookies, i.e. browser type, operating system type, network location (domain), IP (Internet Protocol) address, and other similar information, as well as referrer data identifying the web pages you visited before and after visiting the Website and your movement and activity within the Website, however, no personally identifiable information.

User Cabinet uses aggregated User Information to analyze and improve the design, use, and content of the Website.

User Cabinet may use other technologies such as Web beacons and flash cookies to track the efficiency and effectiveness of our communications and how the Website is used.

The Website incorporates security to allow you to disable/enable cookies. You can accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of the Website if cookies are disabled.

Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the Website.

## Modifications of Privacy Policy

To improve the services we can offer you, User Cabinet may choose to expand its capabilities for obtaining information about users in the future. If we modify this Privacy Policy, we will update the "Date Last Modified" and such changes will be effective upon posting.

Regardless of any changes, we make to our Privacy Policy, we will always use your User Information following the version of the Policy in place at the time you provided your information unless you give your express consent for us to do otherwise.

You should review this Privacy Policy regularly to ensure that you are aware of any amendments made.

If you do not accept this Privacy Policy, you should cease using the Website.