

## **Privacy Policy**

DrivEd respects the privacy of each client that registers on <https://drivedcrm.com/> website. Please, read this privacy policy in full.

This Privacy Policy governs the relations between an individual entrepreneur Oleksii Shapran (hereinafter referred to as DrivEd) (ID Code 3054013432, located at: Ukraine, Kharkiv region, Kharkiv, Heroyiv Pratsi Street, 33, apartment 116) and any other party, including companies, self-employed, entrepreneurs or any other legal entity (hereinafter referred to as the Client), regarding the processing of personal data during the usage of Platform, delivered under DrivEd Public offer/License agreement. The Privacy Policy applies to all data and details obtained by DrivEd from a Client/Administrator/User during using the Platform. If any conditions defined by this Privacy Policy are not accepted by a person that intends to use the Platform, such a person has no justification to use the Platform.

### **1. General Conditions**

- 1.1. The following Privacy Policy is composed based on the acting legislation of Ukraine including the Law of Ukraine “On the personal details protection”.
- 1.2. The Privacy Policy applies according to the Public offer and License agreement of DrivEd.
- 1.3. Assessing and acknowledging this Privacy Policy is obligatory for gaining the right to access DrivEd.
- 1.4. By registering in DrivEd the Client acknowledges he is acquainted with all the aforementioned documents and this Privacy Policy below. The Client’s consent as a subject of personal data is a voluntary expression of the will to grant permission to process the personal details according to the proclaimed goal of said processing. This consent is provided during registration in the system by placing a mark on granting permission to process personal data in accordance with the stated purpose of their processing.

1.5. Processing of personal data is any action or set of actions, such as collecting, registering, accumulating, storing, adapting, modifying, updating, using and distributing (sharing, realizing, transferring), depersonalizing, destroying personal data, including using informational (automated) systems.

1.6. When registering a Client / Administrator / User in the DrivEd, their account (profile) is automatically created, including a number of personal data. The Client / Administrator / User assumes full responsibility for the fact that the data entered is true, complete and relevant in content.

1.7. The Client independently chooses the password during the registration process, therefore, DrivEd is not responsible for its reliability and for the consequences of the transfer of the password to the third party (Administrator / Users) by the Client. DrivEd has the right to prohibit the use of certain logins, may set requirements (length, permissible characters) for creating a password, passwords encryption and use password management software.

1.8. In the event that DrivEd has grounds to believe that the information provided is incomplete or false, DrivEd reserves the right to block or delete the Client / Administrator / User account at its own discretion and to prohibit the Client / Administrator / User from using the Platform in full or in part.

1.9. Customer bears the sole responsibility for the distribution of data for access to the platform (IDs, passwords, etc.), for the personal data of other persons (Administrator / Users), and the content nature, including the content compliance to applicable law.

## **2. Information processing purposes and types.**

2.1. Information provided to the DrivEd may include:

- data, including third party (Administrator / User) data: first name, last name, date of birth, gender, marital status, family information, postal address, e-mail, telephone number, field of practice (s) and / or photo, Internet Protocol (IP) address, browser type, Internet Service Provider (ISP), links page, interests, dates and times of entry / exit, operating system, etc .;

- information related to the Client's activities;
- downloadable content;
- the information we receive about Client / Administrator / User from other official sources, including social networks, and through messengers who are configured to work with the platform.

2.2. The Client warrants that he has obtained all necessary permissions and consent to the placement of personal information concerning third parties, and also guarantees the full and unconditional consent of these persons with all provisions of this Privacy Policy.

2.3. The DrivEd informs that it uses cookies to personalize content, for marketing, performance analytics, security features and their launch, as well as for the ability to access secure areas of the platform.

2.4. The processing of personal data can be carried out with the following purposes:

- proper provision of services for the administration and optimization of studying process;
- improvement of the platform, including upgrading according to the needs of the Client;
- marketing goals, namely, bringing new product features to the attention of the Client;
- communication with the technical support department, the marketing department and other Platform structures, including for acceptance of offers from the Client / Administrator / Users;
- settlement of conflict situations;
- ensuring the fulfillment of the rights of the Client / Administrator / Users of the Platform.

2.5. DrivEd does not control the authenticity and relevance of the information provided to them. However, the Platform is entitled at any time to require the Client / Administrator to confirm the validity of the information used when registering an account.

2.6. DrivEd can provide the ability to integrate the platform with third-party products. DrivEd has the right to place links to third-party websites/platforms/services. At the same

time, DrivEd is not responsible for the collection, storage, and processing of personal information by third-party software, that is, in such cases, this Privacy Policy does not apply.

2.7. DrivEd informs that the data provided by the Client / Administrator / User, or which is collected from the Client / Administrator / Users is stored on servers located in Western Europe.

2.8. DrivEd has the right to publish/post personal reviews of the Client / Administrator / User about the Platform on its website. If Customer / Administrator / User wants to delete their feedback, he/she should email the demand to <https://drivedcrm.com/>.

### **3. Cases of personal information disclosure**

3.1. Personal data may be transferred for the fulfillment of the contract, where the Client is either the acting party, the beneficiary or guarantor, subject to prior consent from the Client.

3.2. Personal data may be used to protect the rights and legitimate interests of the Platform or third parties in cases where the User violates the copyright and other intellectual property rights of the DrivEd and/or Public offer/License agreement. In this case, the information may be transmitted to the controlling / law enforcement authorities and the court.

3.3. Personal information may be transmitted for connection and/or registration of third-party software products on behalf of the Client, subject to prior consent from the Client.

### **4. Rights of the Client / Administrator / Users**

4.1. Client / Administrator / Users are entitled to:

- protect their personal data within the framework of this Privacy Policy and the current legislation of Ukraine;
- edit their account (profile) by making changes and additions;

- in case of termination of the use of the platform, to demand the removal of all account data and content;
- download content related to the activity of the Client at any time convenient for it;
- leave feedback on the work of the DrivEd.
- require the DrivEd not to use personal data for marketing purposes, by sending an appropriate letter to ask@drivedcrm.com.

4.2. The Client has the right to grant access to the Platform to additional Administrators / Users.

## **5. Security of personal information**

5.1. DrivEd takes the necessary legal, organizational and technical measures or ensures their adoption in order to protect Personal Information from unlawful or accidental access to the information, destruction, modification, blocking, copying, provision, distribution of personal data, as well as other unlawful actions in relation to Personal Information, including but not limited to:

- Uses RSA encryption in the DrivEd.
- Protects authorized sessions.
- Constantly improves the ways of collecting, storing and processing data.

## **6. Final provisions**

6.1. This privacy policy may be changed unilaterally by the DrivEd, by placing the policy terms in the new edition of the Internet at <https://drivedcrm.com/>.

6.2. DrivEd recommends to periodically review this Privacy Policy to stay aware of the changes.

6.3. The procedure for using the DrivEd platform is governed by the Public offer and License agreement.

6.4. In the event of any discrepancy between this Privacy Policy and the terms of the Public offer/License agreement, the relationship is governed by the terms of the Public offer/License agreement.