

PRIVACY AND DATA PROTECTION POLICY

ALL VISITORS TO THE SERVICE ARE REQUIRED TO READ THIS PRIVACY POLICY IN ORDER TO UNDERSTAND HOW THE COMPANY COLLECTS, USES, PROCESSES AND STORES PERSONAL DATA IN THE COURSE OF CONDUCTING ITS ACTIVITIES, AS WELL AS WHAT SECURITY MEASURES ARE APPLIED BY THE COMPANY IN THIS REGARD.

Preamble

In the process of collecting and using personal data, the Company is subject to a number of legislative acts regulating the procedure for carrying out such activities, as well as guarantees that must be established for data protection. The Company complies with all the conditions and requirements stipulated by the current legislation of the Republic of Cyprus, European legislation, including, but not limited to, the General Data Protection Regulation (hereinafter referred to as "GDPR"), as well as other international legal acts that relate to the issue of data protection.

This Policy applies to all employees of the Company, independent contractors, Users, interested parties and all other entities that directly or indirectly participate in the processing of personal data, including Visitors who visit the website <https://offergate.pro/>, as well as its subdomains.

1. CONCEPTS.DEFINITIONS. GENERAL PROVISIONS

This Privacy Policy (hereinafter referred to as the "Policy") regulates the relationship between the company ADV BIZ LTD, which is registered and operates according to the legislation of the Republic of Cyprus, address: 2 Agia Fylaxeos & Christoforos Perevos, Kalia Court, Address/Office 601 3025, Limassol, Cyprus, (hereinafter referred to as the "Company") and You in regard of the use of your personal data.

This Policy applies to every person who is a subject of personal data and whose personal data is processed by the Company, including Users, Visitors, other contractors of the Company (including their employees), as well as other customers (hereinafter referred to as the "Data Subject").

1. **"User"/ "You" /"Data Subject"** — an individual, a legal entity, a Site Visitor, including independent contractors/employees and other interested parties accepting the terms of this Policy and the User Agreement posted on the Internet at: <https://offergate.pro/terms> those wishing to receive the services of the Service and third parties in accordance with the legal documents of the Service published on the Website;
2. **"Site Visitor"** — a person who came to the Site without the purpose of placing or accepting an Offer.
3. **"User Account", "Account", "Personal Account" or "Account"** - a set of User data stored on the Service, necessary for its authentication (identification), as well as a web interface provided to the User for using the Service and providing access to his personal data and settings. The account is created as a result of User registration.
4. **"Personal Data"** is information provided by the Data Subject that allows to establish the identity of the Data Subject. These include name, email address, payment data and other information that may be regarded by the Service as identifying;
5. **"Data controller (controller)"** is a natural or legal person, a state body or another body that independently or jointly with others determines the purposes and means of processing personal data.
6. **"Data Operator (operator)"** means a natural or legal person, a government agency, agency, or other body that processes personal data on behalf of the Controller.

7. **"Processing"** means any operation or series of operations that are performed with personal data or sets of personal data with or without automatic means, such as collection, registration, organization, structuring, storage, adaptation or modification, search, use, disclosure by transmission, distribution or other provision, ordering or combination, restriction, erasure or destruction.
- Use of the website [https://offergate.pro /](https://offergate.pro/), as well as its subdomains, means its unconditional consent to this Policy and the terms of personal data processing.
 - In case of disagreement with the terms of the Policy, You must stop using the website <https://offergate.pro/>, as well as its subdomains.
 - The Company is the controller of only those personal data that it receives from You when using website <https://offergate.pro/>, as well as its subdomains with Your consent provided by You performing certain actions on the website <https://offergate.pro/>, as well as its subdomains.
 - The Company does not verify the accuracy of the personal data provided by You on the website <https://offergate.pro/>, as well as its subdomains. The Company assumes that You provide reliable and sufficient personal data and keeps this information up to date. You are personally responsible for the consequences of providing false or invalid personal data.
 - You confirm that by submitting your personal data and giving consent to their processing, You act voluntarily, of your own free will and in your own interest, and also confirm your legal capacity.
 - By submitting your personal data, You agree that the personal data provided by You will be processed by the Company both with the use of automation tools and without the use of such tools.

2. PRINCIPLES OF PERSONAL DATA PROCESSING

When collecting and processing personal data, the Service adheres to the principles established by GDPR. The policies and procedures of the Service are designed to ensure compliance with the principles:

Legality	The data controller determines the legality of the grounds prior to the processing of personal data (for example, the availability of consent).
Justice	In order to process data fairly, the Controller must make certain information available to Users as much as practicable. This concerns whether the personal data was obtained directly from the data subjects or from other sources.
Transparency	Any information concerning the processing of personal data should be accessible and understandable, as well as presented in a simple and understandable language.
Target restriction	Personal data must be collected for certain legitimate purposes and not processed in ways incompatible with these purposes; processing in the public interest, scientific, historical, research or statistical purposes is not considered incompatible with the original purposes.
Data minimization	Personal data must be sufficient, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Accuracy	Personal data must be accurate and, if necessary, updated; all appropriate measures must be taken to ensure that personal data that was inaccurate, taking into account the purposes for which they were processed, are erased or corrected without delay.
Storage restriction	Personal data must be stored in a form that allows the identification of data subjects for no longer than is necessary for the purposes for which personal data is processed. Personal data may be stored for longer periods of time while they are processed solely for the purposes of public interest, scientific or historical research or statistical purposes, subject to the implementation of appropriate technical and organizational measures required by the GDPR to protect the rights and freedoms of the Data Subject.
Integrity and confidentiality	Personal data must be processed in such a way as to ensure the proper security of personal data, including protection against unauthorized or illegal processing, as well as against accidental loss, destruction or damage using appropriate technical or organizational measures.

3. PERSONAL DATA THAT THE COMPANY RECEIVES AND PROCESSES.STORAGE CONDITIONS

The Company collects and stores only those personal data that are necessary for the provision of the Service and the provision of services (including the execution of agreements with the User). The Company collects, uses, stores and processes data also to improve the level of services provided, while creating a reliable and secure environment for working with data in accordance with the applicable legislation.

The Company may use the User's personal information for the following purposes:

Personal data	Purpose
Name and surname	It is necessary for polite treatment of the User, for authorization on the website and Service, identification of the party within the framework of agreements with the Company and Users, compliance with the tax and accounting legislation of the Republic of Cyprus.
E-mail	It is necessary for creating a User account, subsequent identification and granting him access to personalized Service resources.
Login (phone number) telegram/skype	It is necessary to communicate with the User, including sending notifications, requests and information regarding the use of the Service, the provision of services, as well as processing requests and requests from the User.
IP address	They are necessary for the Service for internal control, to improve the operation and content of the Service, to prevent and suppress any errors that may occur when using the Service, to prevent fraud associated with the provision of the Service, to notify the User of changes in the Service

	<p>and personalized use of the Service (including for advertising).</p> <p>Creating and maintaining a reliable and secure environment:</p> <p>Detection and prevention of fraudulent actions, spam distribution, other abuses, security breaches and other malicious actions; Conducting security breach investigations and risk assessment; Compliance with applicable legislation; Resolving any disputes and ensuring compliance with agreements, contracts with third-party service providers; Ensuring compliance with the terms and regulations of other legal documents of the Service.</p>
<p>A copy of the User's passport or other identity document - containing his first name, last name, and the number of the main identity document of the User.</p>	<p>The Service may need to identify the User, verify his Account, prevent abuse and violation of the rights of the User or the rights of others. For example, the Service can use this information to verify the identity of a User if he has lost his Credentials and wants to access his Account.</p> <p>Confirmation of the accuracy and completeness of the personal data provided by the User.</p> <p>The Service has the right, but is not obliged, to take additional verification measures that the Service deems reasonable to verify the User's Account.</p>
<p>Cookies</p>	<p>It is necessary for quick authorization of the User on the Service, for the purposes of generating statistics and optimizing advertising messages.</p>
<p>Information required for payment of remuneration, billing (payment details)</p>	<p>Depending on the payment method chosen by the User, taking into account the requirements of the payment system specified by the User, as well as the Service's compliance with the mandatory requirements of the tax and accounting legislation of the Republic of Cyprus, the Service may require the following information to pay the User remuneration:</p> <p>last name, first name of the User; date of birth; the address of the place of residence, including: index, country, city, street, house and apartment number; details of the selected payment system; bank card number; bank card validity period (year and month)</p>
<p>Residential address Country of location</p>	<p>The Service may need to identify the User, verify his Account, prevent abuse and violation of the rights of the User or the rights of others. For example, the Service can use this information to confirm the identity of the User if he has lost his Credentials and wants to access his Account, as well as the Service's compliance with the mandatory requirements of the tax and accounting legislation of the Republic of Cyprus.</p>

The Company may store the above information until the User stops using the Service and deletes his Account, except in cases when the storage of personal data is necessary for the Company to fulfill its legal obligations, to resolve disputes, to fulfill other agreements of the Company, to maintain business activities and to continue the development and improvement of the Service.

After the expiration of the retention period, the Company is obliged to delete personal data or request a new consent from the User, provided that the need for processing personal data remains relevant to the Company, or that other data processing purposes have arisen.

The Company has the right to terminate the storage in the future and delete the previously collected personal data of the Data Subject at any time if it no longer needs such personal data. At the same time, the Company is obliged to notify the relevant Data Subject about the deletion of his personal data.

The Company may continue to store personal data if subsequent processing is provided for by law and is relevant for purposes that are incompatible with the original purpose of processing specified in this Policy. At the same time, incompatible goals mean goals that relate to the archiving of data in the public interest, as well as for scientific, statistical or historical purposes.

4. LEGALITY AND CONDITIONS OF PROCESSING OF THE USER'S PERSONAL INFORMATION AND ITS TRANSFER TO THIRD PARTIES

Personal data of Users is collected when the corresponding User visits the Website [https://offergate.pro /](https://offergate.pro/), as well as its subdomains. At the same time, personal data is collected in accordance with the User's consent. Consent is considered granted after the User has clicked the button "I consent to the processing of personal data" before completing the registration procedure on the Service. By providing consent, the User confirms and accepts all the conditions specified in this Policy.

By checking the box before the corresponding offer, the User confirms that he has turned eighteen (18) years old.

The Company does not collect and/or process sensitive data that disclose racial or ethnic origin, political views, religious or philosophical beliefs, membership in trade unions, as well as the processing of genetic data, biometric data for the purpose of unambiguous identification of an individual, health data, data on the sexual life or sexual orientation of an individual (hereinafter – "Sensitive Data").

The Company does not collect and/or process any other personal data of Data Subjects other than those specified in this Policy. The Company collects personal data only to the extent necessary for the processing purposes specified in this Policy.

The Company undertakes to reduce the risks of violation of personal data protection, which may lead to accidental or illegal destruction, loss, alteration, unauthorized disclosure or access to transferred, stored or otherwise processed personal data (hereinafter referred to as "violation of personal data protection").

The company selects contractors with an impeccable reputation and enters into confidentiality agreements with them in this regard.

The company collects information worldwide and stores this information in the EU, in the Netherlands. The Company may transfer, process and store User information outside the User's country of residence, wherever the Company or service providers carry out their business activities for the purpose of providing services to the User.

The Age Of The Data Subject.

The Company collects personal data on the basis of consent received from Data Subjects who have reached the age of 18.

By registering on the Website and providing the Company with consent, the relevant Data Subject acknowledges that he/she has reached the age of 18 and has every right to provide the Company with consent to the processing of his/her personal data.

If You are aware of cases where the Company processes data of a person under the age of 18, we ask You to inform us by writing to the e-mail address: og_support@offergate.pro.

Collecting and processing personal data of Users, the Service acts as a controller, in connection with which an appropriate range of rights and obligations arises. The Company is not a controller or processor of personal data of Third parties.

The Company does not sell personal data to legal entities or individuals.

- 1. It should be understood that the Company transfers personal data on the basis of GDPR.** Personal data is transferred for the purposes and under the conditions provided for in this Policy.

2. The Company has the right to provide User information to third parties for the purposes specified above. At the same time, these third parties are obliged to adhere to this Privacy Policy.

The Company has the right to transfer the User's Personal Information to third parties in the following cases:

- **The user has expressed explicit consent to such actions.**

The User's explicit consent means that the User agrees to the disclosure or transfer of personal data and notifies about it by putting a corresponding tick in the check-box before going through the registration procedure.

- **The data is transferred to third parties, third-party service providers.**

The Company turns to various third-party service providers in order to provide services to Users. Service providers may be located both inside and outside the European Economic Area ("EEA"), for example, in the CIS countries. Third-party service providers may:

- o conduct special data verification to prevent fraud and analyze the risk situations that have arisen;
- o to carry out the development, maintenance and troubleshooting that occurred during the provision of services and the operation of the Service;
- o to provide services with the help of third parties - third-party platforms and software (for example, through integration with the Company's API);
- o provide services for user service, advertising or payments.

A third-party service provider may require the User's personal data to provide its integrated services/services through the Site or Services, or in the case of inclusion in the services provided by the Company to the User, third-party services, for example, payment and transaction processing services, etc.

- **The transfer is provided for by applicable law.**

Within the framework of the procedure established by law, including in the framework of the execution of court decisions or legal requirements, requests of state bodies, to prevent violations and protect the rights of the user and the Company.

Transfer of data to affiliated legal entities of the Company.

By providing personal data to the Company, the User agrees that this information is also provided to all affiliated persons of the Company, who undertake to maintain its confidentiality and are guided by this Policy.

- **Social network**

Certain personal information of the User may be collected and used to attract potential customers, attract traffic to websites and to promote the Company's products or services. Social networks are not controlled or verified by the Company, so any questions regarding the use of social networks and their processing of User's personal data should be directed to the owner of social networks or the data processor or operator.

- **Summary data**

The Company may collect generalized depersonalized User data as a result of its own analysis and comparative studies of the Service, but without the possibility of further sale of personal information of a particular User. All information in accordance with this provision is processed anonymously.

- **Research of User messages**

The Company reserves the right to view, scan or analyze User messages in the Service in order to prevent fraudulent actions, assess risks, verify compliance with regulatory requirements, improve the level of service provision, and support Users. These actions are carried out in strict accordance with applicable laws and legal documents of the Company.

The company can work with Google to provide its customers with the best advertising opportunities. The user and other data subjects can review Google's policies to learn more about the processing of personal data by Google services. In particular, Google may use remarketing tags (please visit [How Google handles information that comes from sites and applications that use our services to learn more about third parties that Google works with](#)) and other advertising cookies. To learn more, check out the Google Authorized Buyers Program, as well as their Privacy Policy and Cookie Policy.

5. USER RIGHTS

The User owns all of the following rights and can use them by sending an email to og_support@offergate.pro or by changing the privacy settings in the User account.

5.1. Data management

The User can update or change (update, supplement) the information about himself (or part of it) in the User Account at any time. Any inaccurate or incorrect information may also be changed by sending the appropriate request to the e-mail og_support@offergate.pro.

5.2. Data access and copying of information

The User has the right to receive a copy of all information about himself, collected and stored by the Company, by sending a corresponding request to e-mail og_support@offergate.pro.

5.3. Saving and deleting data

The Company stores the User's personal information for the entire time necessary to provide Services and comply with other obligations. The User can request the deletion of personal data and account at any time. In this case, the information of this user must be deleted by the Company as soon as possible and cannot be stored longer than is necessary for the Company to fulfill its obligations.

5.4. Withdrawal of consent and restriction of data processing

The User can revoke his consent to the collection, storage and processing of personal data at any time by sending a corresponding message to the Company.

It is believed that the Data Subject is properly requested withdrawal of consent, if the Data Subject sent a letter about this review at the following email address: og_support@offergate.pro.

The relevant request for withdrawal of consent must be considered within 72 hours from the date of receipt of the withdrawal. After that, the appropriate decision will be made by the Company.

Also, the Data Subject can withdraw consent using the "Opt Out" function on the Website.

The Data Subject has the right to revoke his consent in his account on the Website at any time by deleting such an account. With the help of his personal account on the Website, the Data Subject can withdraw consent to send him the most relevant advertising materials and service offers based on profiling such information about the Data Subject.

5.5. Objection to processing

The User may request that the Company does not process his personal data for specific purposes by sending a corresponding request to e-mail og_support@offergate.pro.

6. SECURITY

6.1. The Company is responsible for ensuring that any personal data owned by the Company and for which it is responsible is kept safe and under no circumstances disclosed to any persons, except in situations where the person was specifically authorized by the Company to obtain such information and signed a confidentiality agreement.

6.2. Only those who need to use them should have access to all personal data. Personal data must be processed in the highest degree of security and stored in encrypted form.

6.3. The Company takes all possible measures to ensure the security and protection of Users' information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions with it by third parties. The Company constantly implements and updates privacy and security measures to prevent unauthorized disclosure, transfer or processing of User's personal data.

6.4. If the User knows or assumes that his personal data has been lost, stolen, misappropriated or otherwise actually or allegedly used unauthorized, the User must immediately contact the Service.

The Company takes all reasonable steps to minimize the risk of violation of the protection of personal data during their processing.

The risk assessment to be carried out by the Company should determine how high the risk to the rights and freedoms of Data Subjects in the event of a data protection violation is a sufficient reason for notifying such Data Subjects of this violation.

7. FEEDBACK METHODS

If You have any questions about data protection methods, data processing, as well as the protection of your rights as a data subject, You can contact us by writing an email to the following address: og_support@offergate.pro.

Data subjects have the right to contact the Company or the DPA regarding a violation of the protection of his/her personal data, if he/she becomes aware of the fact of such a violation earlier than the Company.

The Supervisory Authority (hereinafter referred to as the "DPA") is an independent state body established by an EU Member State in accordance with the GDPR. For the purposes of this Policy, DPA means the Office of the Commissioner for the Protection of Personal Data of the Republic of Cyprus, which is located at Iasonos 1, 1082 Nicosia, Cyprus (website: <http://www.dataprotection.gov.cy/>).

8. OTHER

8.1. The current version of this Policy is available to all interested parties on the Website.

8.2. The Company may update this Policy from time to time, but at least once every 12 months. If the Company makes significant changes to this Policy, it notifies the Data Subjects by e-mail or by publishing a notice on the Website before the effective date of the changes. By continuing to access or use the Site after such changes have taken effect, the Data Subjects agree to the revised Policy.

8.3 This Policy and the relations between the Subject and the Company arising in connection with the application of this Privacy Policy are subject to the law of the country where the Service is located.

8.4. The service can only be used by capable persons. If the Service becomes aware that a person who is incapacitated has provided him with personal information, such information will be immediately deleted by the Service.