# Privacy Policy Last Update: 6 March, 2023

NO LIMIT («**NO LIMIT**», «**Us**», «**We**», and «**Our**») is committed to respecting and protecting Your privacy. In Our work, We strive to comply with all applicable laws to protect the privacy and security of Personal Data.

The NO LIMIT Privacy Policy (*Policy*) applies to all information that NO LIMIT, located <u>https://nlmt.com.ua/</u> (*Website*), can receive about the User while using the NO LIMIT Internet service Website, and also contains a description of Our procedures for collecting, using and protection of the User's Personal Data and an indication of the cases in which the information We collect may be disclosed or transferred to third-party services providers.

You agree to this Policy, any other annexes to the Policy, and any other documents referred to in this Policy by using the Website and/or utilizing NO LIMIT's Services. If You do not agree to the terms of this Policy, You may not use the Website or NO LIMIT Services and You must immediately exit the Website and cease using NO LIMIT's Services.

# 1. DATA PROCESSING PRINCIPLES

**1.1.** We adhere to the following principles to protect Your privacy:

**1.1.1.principle of purposeful limitation** — We process Personal Data fairly and transparently, solely for the achievement of specific, clear, and legitimate purposes, and We do not process them in a manner inconsistent with such data processing purposes;

**1.1.2.principle of data minimization** — We collect Personal Data only to the extent necessary to achieve the defined purposes. We do not store Personal Data if it is no longer needed or if the purposes for which the Personal Data was collected have been achieved;

**1.1.3.principle of limited use** — We use Personal Data for any other purpose only with the consent of the data subject or without such consent if the competent authority expressly permits it;

**1.1.4. principle of data quality** — We always keep Personal Data up-to-date and complete to more effectively achieve the ultimate purpose of data processing;

**1.1.5.principle of security and integrity** — We process Personal Data in a way that ensures adequate security of Personal Data, in particular their protection against unauthorized or unlawful processing and accidental loss, destruction, or damage, using appropriate technical and organizational measures;

**1.1.6. principle of individual participation** — We inform Users about data collection. Users have the right to access their Personal Data and request the correction of inaccurate or misleading data.

## 2. GENERAL INFORMATION

**2.1.** This Policy applies to any individual who uses the Services available on Website or otherwise uses Website («**User**», «**You**» and «**Your**»).

**2.2.** If You do not carefully read, do not fully understand, or disagree with the Privacy Policy, You must immediately stop using the Website.

**2.3.** This Policy applies only to the Website.

**2.4.** Please be attentive when visiting the Website. The Website may contain links to other websites. Once You link to another website, this Policy no longer applies. We are not responsible for the content or privacy policies of other websites.

**2.5.** We assume that all Users have read this Policy carefully, understand its content, and agree to the terms and conditions outlined in this Policy. If You do not agree to this Privacy Policy, You must refrain from using the Website.

### 3. THE POLICY'S OBJECTIVE

**3.1.** The NO LIMIT can acquire, store, process, use, and disclose Personal Data (**«Personal Data**») submitted by the User while using the Website and/or Services. The User authorizes NO LIMIT the right to receive, store, process, use, and disclose the User's Personal Data in accordance with the terms of this Policy by using any aspect of the Website and/or Service. NO LIMIT collects, stores, processes, and uses the User's Personal Data to allow Users to use the Website and/or Services, as well as to defend the rights and legitimate interests of the User of Personal Data as set forth by law.

**3.2.** We may collect and process the following Personal Data (**«Personal Data»**):

3.2.1. IP address.

**3.3.** We may use this Personal Data to carry out information about how You use Our Website and any advertising that You may have seen before visiting Our Website.

## 4. PURPOSES OF PERSONAL DATA COLLECTION

**4.1.** The purpose of processing and collecting Your Personal Data via Website is to ensure that You are able to make use of the Services We provide via Website.

**4.2.** We may use Your Personal Data internally to help Us improve Our Services and to help resolve any problems.

**4.3.** We may also utilize Your Personal Data for other purposes due to the provision of the Services.

## 5. METHODS AND TERMS OF PROCESSING PERSONAL DATA

**5.1.** The processing of the User's Personal Data is carried out within Storage period, in any legal way, including in Personal Data information systems using automation tools or without using such tools.

**5.2.** The User's Personal Data may be transferred to authorized state authorities only based on and as it is prescribed by applicable law.

**5.3.** In case of loss or disclosure of Personal Data, We inform the User about the loss or disclosure of such Personal Data.

**5.4.** We take the necessary organizational and technical actions to protect the User's Personal Data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

#### 6. PROCESSING DATA ON A LEGAL BASE

**6.1.** The Website allows You to contact Us using the Telegram widget, phone number or via email. We use Personal Data collected only to contact You as You await Our response to Your request, and We may also record Your request and Our response to improve the efficiency of the organization and operation of Our support service. We store information that can be used to identify You personally associated with Your request, such as Your email, Your phone number or social media data (if You have provided Us with such data), so that We can contact You and provide You with quality services. If You do not wish Us to collect Your Personal Data, please do not contact Us and do not give Your consent. However, regardless of whether You contact Us or not, certain Cookies are always active on the Website and may be placed without Your consent.

**6.2.** The basis for the processing of the Personal Data of Our Users is their consent to the processing of their Personal Data for communication with them. We use such Personal Data in ways You would reasonably expect and that have minimal impact on Your privacy.

**6.3.** The basis for the processing of Personal Data for marketing purposes is also the consent obtained from You. We use Personal Data in ways You would reasonably expect and that have minimal impact on Your privacy.

#### 7. COOKIES

**7.1.** To offer and provide a customized website experience, NO LIMIT may use cookies to store and help track information about You. Cookies are simply small pieces of data that are sent to Your browser from a web server and stored on your computer's hard drive.

**7.2.** NO LIMIT uses cookies to help remind Us who You are and to help you navigate Our Website during Your visits.

**7.3.** In addition, cookies allow Us to measure Website trends and traffic patterns, such as which areas of the NO LIMIT Website You have visited and which website you came from; to simplify Website navigation; to help design Our Website in order to make it more efficient and enjoyable.

## 8. LAWFUL BASIS OF DATA PROCESSING

**8.1.** If You are located in the **European Union (EU)** privacy rights are granted and all processing of Personal Data is performed by regulations and rules following Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons concerning the processing of Personal Data and on the free movement of such data, known as the General Data Protection Regulation («GDPR»).

**8.1.1.** Under Art. 6 of the GDPR, We only process Personal Data, where We have a lawful basis for doing so.

**8.1.2.** The processing of Personal Data, described in p. 4.2 of this Policy is based on contract obligations (Art. 6 (1) lit. (b) GDPR) and is performed only for the purposes specified in this Policy — to meet Your request concerning the Service, to formalize the development of the contractual relationship.

**8.1.3.** The processing of Personal Data, described in p. 8.1.1 and 8.1.2 of this Policy is based on a legitimate interest (Art. 6 (1) lit. (f) GDPR) and is performed only for the purposes specified in this Policy.

**8.2.** If You are located in **Ukraine**, all processing of Personal Data is performed in accordance with regulations and rules following the Law of Ukraine «On Personal Data Protection».

**8.3.** If You are located in **Kazakhstan**, all processing of Personal Data is performed in accordance with regulations and rules following the law of the Republic of Kazakhstan No. 94-V dated May 21, 2013 «On Personal Data and Its Protection».

**8.4.** If You are located in other countries, that are not mentioned above, all processing of Personal data is performed in accordance with regulations and rules of the following countries.

#### 9. CONSENT TO PERSONAL DATA PROCESSING

#### 9.1. EU Persons Consent to Personal Data processing

**9.1.1.** If You are an EU Person and to process Your Personal Data We need to receive Your Consent, as it is prescribed by GDPR, We will process Your Personal Data only in the case We have received from You a freely given, specific, informed, and unambiguous indication of Your wishes by which You signify agreement to the processing of your Personal Data (**«Consent»**).

**9.1.2.** You have the right to withdraw Your Consent at any time. You can submit such a request by sending Us an email to <u>info@nlmt.com.ua</u>. Your withdrawal of Consent shall not affect the lawfulness of Your Personal Data processing based on Consent before its withdrawal.

**9.1.3.** Except as required or enabled by law We will not use or disclose Your Personal Data for any purpose for which You refuse Consent or later withdraw Your Consent. If You withdraw Consent, You agree that in spite of this withdrawal, We may continue to use the Personal Data previously provided to Us to the extent that We are contractually or otherwise legally obliged to do so and to the extent necessary to enforce any contractual obligation.

## 9.2. Non-EU Persons Consent to Personal Data processing

**9.2.1.** If You are not an EU Person We receive Your consent and process Your Personal Data, as it is prescribed by the laws of Your country.

## 10. THE RIGHTS OF USERS

10.1. Users may review, correct, update, delete and transmit their Personal Data.

**10.2.** Subject to possible restrictions under applicable national law of the data subject You may have certain rights regarding the Personal Data that We collect on You, particularly:

**10.2.1.Right to object to the processing of Your Personal Data.** Users have the right to object to Our processing of their Personal Data by contacting Us at <u>info@nlmt.com.ua</u>. Once We receive an objection, We will no longer process Your Personal Data unless it is necessary to provide Our Services or We demonstrate other legitimate grounds for Our processing that override Your interests, rights, and freedoms or for legal proceedings.

**10.2.2.Right to access Your Personal Data.** Users have the right to find out whether We process their Personal Data, what categories of Personal Data We process about them, the purposes of the processing, the categories of third parties to whom We may disclose the Personal Data of Users, the Storage period of their Personal Data or the criteria for determining it by contacting Us at info@nlmt.com.ua.

**10.2.3.Right to verification and correction**. Users have the right to verify their Personal Data's accuracy and request its update or correction. Upon receipt of such a request, We have the right to verify the grounds for updating or correcting Personal Data and request additional information and documents from You that confirm such grounds. If there are sufficient grounds to update or correct Personal Data, We will make the necessary changes as soon as possible.

**10.2.4.Right to restrict the processing of Your Personal Data**. Users have the right, under specific circumstances, to request that We restrict the processing of their Personal Data as required by applicable data protection laws, such as when Our processing is unlawful. In this case, We will not process Your Personal Data for any purpose other than to store it.

**10.2.5.Right to receive Your Personal Data and to transmit it to another Controller**. Where Our processing is based on Your consent and is carried out by automated means, You have the right to receive Your Personal Data in a structured, commonly used, and machine-readable format and, where technically feasible, to transmit it to another Controller without any hindrance.

**10.2.6.Right to withdraw consent**. Where Our processing is based on Your consent, You may withdraw Your consent at any time.

**10.3.** You also have the right to file a complaint with a supervisory authority if You believe We are violating Your rights. But We ask You to contact Us first so that We can help You.

**10.4.** When We receive any request to access, edit or delete personally identifiable information, We reserve the right to initially take reasonable steps to verify Your identity before granting You access or otherwise taking action. This is essential to protect Your information.

## 11. INFORMATION STORING AND DELETION

**11.1.** Personal Data shall be processed and stored only for as long as is necessary for the purpose for which it was collected **(«Storage period»).** 

**11.2.** We will store, collect and proceed Your Personal Data for as long as You are Our User and We have Your consent. Personal Data that is collected and processed with Your consent will be stored for as long as We have Your consent.

**11.3.** The User can delete Personal Data at any time. To delete Personal Data You need to send Us an email to <u>info@nlmt.com.ua</u> with Your request for Personal Data to be deleted, and We will delete all Your Personal Data immediately in the case of receiving Your request for a Personal's Data deletion.

**11.4.** After the expiry of the Storage period, We shall delete Personal Data. Therefore, the right to object to the processing, the right to access, the right to delete, the right to correction, the right to restrict the processing, and the right to receive and transmit Personal Data cannot be exercised after the expiry of the Storage period.

### 12. INFORMATION SECURITY

**12.1.** We care about the security of Your Personal Data. We adhere to generally accepted industry standards to protect the data transmitted to Us, both during transmission, and after it is received. We take technical, physical, and administrative security measures to ensure that Your Personal Data is adequately protected. When We process Your data, We also ensure that Your data is protected against unauthorized access, loss, manipulation, falsification, destruction, or unauthorized disclosure. This is achieved through appropriate administrative, technical, and physical measures.

**12.2.** No 100% secure way to transmit data over the Internet or electronic storage exists. Therefore, We cannot guarantee their absolute security.

**12.3.** We never process any special categories of Personal Data and/or data on criminal offenses. In addition, We never conduct Personal Data profiling.

#### 13. SERVICE PROVIDERS AND CONTRACTORS

**13.1.** We cooperate with third-party service providers who provide Us with services such as website development, hosting of Website, maintenance, emailing, marketing, technical support and collateral, information technology and cybersecurity services, customer support, and other services. These contractors may access the Personal Data or process it on Our behalf as part of their services to Us. We limit the information provided to Our service providers to only that which is reasonably necessary to perform their functions.

**13.2.** We may need to transfer Your Personal Data to third parties who provide these services. If Your Personal Data is transferred outside the European Economic Area (**«EEA»**), We require such third parties to maintain appropriate security measures.

**13.3.** We ensure that We hold data processing agreements with Our service providers that ensure compliance with the GDPR and Our contracts with them which require the privacy of Personal Data. All data transfers within and outside the EEA are carried out under these data processing agreements. All data transfers are carried out under the strictest security rules.

**13.4.** For more information on cross-border information transfers to Our partners, service providers, and developers outside the EU/EEA, please contact Us using the details provided in the «Contact us» section below.

# 14. ADDITIONAL PROVISIONS

**14.1.** NO LIMIT is entitled the right to make changes to this Policy without the consent of the User.

**14.2.** We may occasionally change and update Our Privacy Policy, so please review it frequently. All changes and updates to this Privacy Policy are effective when posted on the Website. We reserve the right to change and update this Privacy Policy at any time without prior notice.

**14.3.** If there are any changes to this Privacy Policy that We believe are material, We will make every effort to notify You in advance through Your contact information provided to Us or by posting a notice on Website.

**14.4.** All suggestions or questions regarding this Policy should be directed to info@nlmt.com.ua.

# 15. CONTACT US

**15.1.** If You have questions about this Privacy Policy, please send an email to <u>info@nlmt.com.ua</u> or contact Us through Telegram widget.

# **NO LIMIT**