

Policy on the Processing and Protection of Personal Data

(hereinafter “Policy”)

1. Terms and Definitions.

For the purposes of this Policy, the terms and definitions, save for the terms and definitions set forth in the Agreement (as defined below) or throughout the text of this Policy, are used and applied in the following meaning:

Agreement – terms of use and contract (public offer agreement) for the right to use the software product “ucode” published on the Company’s Website.

Company - limited liability company “Ucode World”, a legal entity registered under the laws of Ukraine, having identification number under USREOU: 43513258, residing at the following address: 04112, Kyiv, Dorogozhytska street, bldg. 3, section 2.

Personal Data Controller - a natural or legal person who determines the purpose of personal data processing, establishes the composition of these data and the procedures for their processing, unless otherwise provided by law.

User – an individual who has agreed to the terms of (accepted) the Agreement.

Depersonalization of personal data (pseudonymisation) - deleting records that provide identification of a person.

Consent of the Data Subject - voluntary expression of will of an individual (subject to his/her awareness) regarding permission to process his/her personal data in accordance with the stated purpose of their processing, expressed in writing or in a form that allows to make a conclusion on giving consent.

Personal Data Processing — any action or set of actions performed in whole or partially in an information (automated) system and/or in personal data files related to the collection, registration, accumulation, storage, adaptation, modification, renewal, use and distribution (dissemination, implementation, transfer), depersonalization, destruction of records about the Personal Data Subject.

Personal Data Processor - means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Personal Data Controller.

Personal Data - information relating to an identified or identifiable natural person (“Personal Data Subject”).

Platform - means the online platform available at <https://lms.ucode.world>.

Website - means the website www.ucode.world, apply.ucode.world (for the purposes of this Policy, unless expressly specified otherwise, the Website shall refer to the Platform as well).

Personal Data Subject - an individual whose personal data is processed.

2. Consent. The Purpose of Personal Data Processing. Transfer.

2.1. **Automatic collection of technical information.** During work with the Website or Company’s online platform, technical non-personal information about the user such as the user’s IP address, address of another site the user came to the Website from, time of the visit, and browser type and language version, may be collected automatically. The Company may also collect and analyze navigational information, namely the address and path of the user through the Website, actions performed at the Website, jumps to and from inner links, etc.

2.2. **Consent.** Personal information of the User is collected only upon prior permission from the User to collect and use certain information within these Policy rules. Giving such permission, the User supplies such information voluntarily. Personal data are processed on the basis of the consent of the Personal Data Subject and other legal grounds in strict accordance with the current legislation of Ukraine in the field of personal data protection, and stored in paper and/or electronic form.

2.3. **The Purpose of Personal Data Processing.** The User, as a Personal Data Subject, by accepting (Accept) of the Agreement, gives the Company his/her unambiguous consent/permission (hereinafter “**Consent**”) for:

- I. Processing by the Company of the User's Personal Data for the purpose of:
 - (1) the performance by the Company of its business activities, the offering by the Company and/or third parties (any persons with whom the Company is in contractual relations (hereinafter “**Third Parties**”) of full range of services including via the direct contact with the User by means of communication and/or provision of services by the Company, including the execution/modification and/or execution of any contracts;
 - (2) providing of services by the Third Parties to the Company for the purposes of proper performance of its functions and/or for the execution of contracts concluded by the Company with Third Parties (for instance, banking institutions or payment providers),
 - (3) ensuring the implementation of tax, accounting, statistical and other accounting, reporting, auditing, etc.;
 - (4) account creation, administration and maintenance;
 - (5) processing of requests and operations of the User on the Website or in the software product;
 - (6) customer support;
 - (7) data analysis and statistical studies to improve the offered services, products or technologies;
 - (8) protecting by the Company of its rights and interests;
 - (9) the execution by the Company of its rights and the performance of its obligations under other agreements between the Company and the User;
 - (10) marketing communications for the promotion and advertising of Company’s services, products and third-party products.
- II. Transmission (distribution), including transboundary, by the Company of Personal Data to Third Parties, modification, destruction of, or limitation of access to the Personal Data, inclusion of the Personal Data in the Company’s Personal Data database for the purpose of the above-mentioned Consent, and without the need to provide the Personal Data Holder with a written notice of the implementation of the said actions.

II.3. By accepting (Accept) of the Agreement, the User confirms (a) that he/she was informed about the inclusion of his/her Personal Data in the Company's Personal Data database, (b) the fact of familiarization with (i) the rights of the Personal Data Holder, provided by the Law of Ukraine "On Protection of Personal Data" of 01.06.2010 and/or GDPR (hereinafter the “**Law**”), (ii) the purposes of processing the Personal Data defined in this Policy, (iii) information regarding the persons to whom the Personal Data may be transferred, and

certifies that the composition and content of the Personal Data is relevant to the purposes of the processing of the Personal Data.

II.4. The Company shall ask for the consent of the User before using his/her Personal Data otherwise than for a purpose specified in this Policy.

II.5. Our promotional and advertising messages will always be clearly identified as promotional and/or advertising, and will always contain both return e-mail address and physical postal address of the Company. This return e-mail address will be capable of receiving User communications for no less than 30 days after the transmission of the original message.

II.6. Personal information collected by the Company may be processed and stored in other countries at facilities belonging to Company and/or legally used by the Company. Supplying the Company with the personal information, User permits its transfer outside the country within the bounds of such use, provided that privacy laws in other countries where the information is transferred to may not be as protective as those in users' jurisdiction, however still adequately protected.

3. Personal Data Distribution.

The User's Personal Data may be communicated and transmitted to partner agencies that provide services on behalf of the Company. These services may include money transfers, data storage, license resale, payment processing, and more. These Third Parties will only receive the information necessary to provide the specific services and will not be used for any other purpose.

Information about Users may also be transferred and disclosed in the event of acquisition, sale or merger of the Company as one of the business assets. In case of such event, the Company will inform the Users in accordance with the procedure described below.

The Company reserves the right to disclose and transmit Personal Data of the User if it meets the requirements of the law, as well as if such disclosure is necessary to protect the rights of the Company and/or comply with litigation, regulations or court decisions on the Website, Platform, the Company's software.

4. Term.

The User agrees for the processing of Personal Data for a period which is necessary in accordance with the purposes of processing of Personal Data specified in this Policy, but in any case, until the dissolution of the Company and/or its successors.

5. Personal Data.

Pursuant to the defined in paragraph 2.3. herein purpose of processing, legislature, current business objectives, the Company collects and processes the following (any or all) of the following Personal Data of the User::

- Name and surname;
- Date of birth;

- Taxpayer registration card number;
- Passport or ID-card data;
- Residential address;
- Bank details;
- Contact information, including e-mail address and telephone number;
- links to accounts in social networks on the Internet;
- other data/information/records provided by the User, which allow him/her to be identified as an individual.

The Company never requires Users to provide genetic and biometric data, information that revealing racial or ethnic origin of users, their political opinions, religious or philosophical beliefs, trade-union membership, and data concerning their health or sex life or sexual orientation.

The User has the right to refuse to provide Personal Data at any time. However, in this case, some of the features and services provided may be partially or fully limited and/or remain unavailable.

In the course of Company's operation activities, it monitors the use and compliance with information security standards, namely:

- limitation of the access to information only to those employees or contractors who need it for providing services to the User;
- requires employees or contractors to include relevant provisions in existing agreements or to sign a separate agreement on non-disclosure;
- requires Third Parties involved in the performance of certain functions to sign a confidentiality agreement and prohibit the disclosure of such information for any unauthorized purposes;
- uses the encryption of payment data, such as credit card numbers, using SSL technology by using the payment services of Third Parties (third-party providers that provide these services);
- stores personal information received from the User in encrypted form on computers protected from unauthorized access.

As there is no absolutely reliable way to protect information in the process of its storage, processing and transmission in electronic form, the Company does not provide a full guarantee of its security, despite all the efforts made by the Company to do so. If the account information and Personal Data of the User are protected by a password, the responsibility for their security and non-disclosure rests with the User, unless the security breach does not occur due to intentional actions of the Company.

6. Procedure for Working with Personal Data Subject's Requests.

6.1. The Personal Data Subject has the right to receive any information about himself from any subject of relations related to personal data, without specifying the purpose of the request, except as provided by law. Each User is entitled to the following:

- the right to access;
- the right to rectification;
- the right to erasure;

- the right to restrict processing;
- the right to object processing;
- the right to data portability.

6.2. The Personal Data Subject's can access data about himself free of charge. The User can view and edit the information provided by the User in the "Profile" section. Alternatively, Users may contact the Company at hello@ucode.world with a request.

6.3. The Personal Data Subject submits a request for access (hereinafter - the request) to personal data to the owner of the personal database.

The request shall include:

- surname, name (and patronymic, if applicable), place of residence (location) and details of the identity document of the Personal Data Subject or other information that allows to identify the person as the Personal Data Subject;
- information on the Personal Data base in respect of which the request is submitted, or information on the owner or administrator of this database;
- list of Personal Data requested.

6.4. The term for review of the request whether to be satisfied or not may not exceed seven working days from the date of its receipt.

During this period, the Company notifies the Personal Data Subject that the request will be satisfied or the relevant personal data are not subject to provision, indicating the grounds specified in the relevant regulations.

The request shall be satisfied within one month from the date of its receipt, unless otherwise provided by law.

7. Links and Blogs.

The Website pages can contain links to sites, services and functions of Third Parties, subsidiaries and affiliates that may use and conform to different rules and procedures of confidentiality provisions from those stated here. The Company shall not be held liable for the policy of confidentiality and personal data processing of such resources. To find out how third-party systems use your information, please review their privacy and personal data processing policies..

Our Website may include social media features, such as widgets, "Share This" button or interactive mini-programs that run on the Website. These features may collect your Internet protocol address, which page(s) you are visiting on our Website, and may set a cookie to enable the feature to function properly. When social media features and widgets are hosted by a third party, your interactions with these features are governed by the privacy statement of the company providing it.

Our Website offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas is provided voluntarily and may be read, collected, and used by others who access them.

8. Changes to this Policy.

The Company may update this Policy to reflect changes to our information practices. If we make any changes, we will notify the Users by means of a respective notice on the Website prior to the change becoming effective or by sending a notification to the User's email address. We encourage you to periodically review this page for the latest information on our privacy practices.

9. Contacts.

If you have any questions, please contact us with the following contact details:

«UCODE WORLD» LLC

Address:

04112, Kyiv, Dorogozhytska street, bldg. 3, section 2

USREOU identification code: 43513258

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hello@ucode.world