# **General Privacy Policy**

In this policy references to Vijaya Tech Ltd. (Our registered company name), or Notamedia (our Trademark), or the Company.

We are committed to maintaining robust privacy protections for our users. Our Privacy Policy ("Privacy Policy") is designed to help you understand how we collect, use and safeguard the information you provide to us when using our Service.

For the purposes of this Privacy Policy, "Site" refers to the Company's website, which can be accessed at <a href="https://notamedia.com">https://notamedia.com</a>

The terms "we," "us," and "our" refer to the Company.

"You" refers to you, as a user of our Site or our Service.

"Personal Data" means any information relating to an identified or identifiable natural person ('data subject').

## I. INFORMATION WE COLLECT

Personal information we collect through our website:

2.1 Information collected via Technology

To improve the quality of the Service, we track information provided to us by your browser or by our software application when you view or use the Service. We track this information using cookies, or small text files which include an anonymous unique identifier.

# 2.2 Information you provide us by sending request via the Contact form provided on the Site

In addition to the information provided automatically by your browser when you visit the Site, you may wish to contact us and send your request for cooperation via the Site. You can fill in the Contact form entering your name, email address, and contact number. By filling in the Contact form, you are authorizing us to collect, store and use your email address in accordance with this Privacy Policy.

## Children's Privacy

The Site and the Service are not directed to anyone under the age of 18. The Site does not knowingly collect or solicit information from anyone under the age of 18, or allow anyone under the age of 18 to sign up for the Service. In the event that we learn that we have gathered personal information from anyone under the age of 18 without the consent of a parent or guardian, we will delete that information as soon as possible. If you believe we have collected such information, please contact us at sales@notamedia.com.

## **II. HOW WE USE AND SHARE INFORMATION**

For the purposes of IT hosting and Software maintenance, your information may have to be situated or transferred outside of the European Economic Area (EEA). Should this be the case, it will be done in accordance with guidance issued by the European Commission. For example, we utilize standard contract clauses approved by the European Commission to ensure there is a legal basis to process the personal data to legitimize data transfers from the EEA to the other countries.

We acknowledge and agree that we have rights and obligations under applicable Data Protection Legislation. In processing any personal data with for the provision of our Product, we will process the data only to the extent, and in such a manner, as is necessary for our legitimate business interests. Before doing this, though, we will also carefully consider and balance any potential impact on you and your rights.

We shall not process, nor permit the processing, of the data for any other purpose.

As a general principle, we may share your information with the following:

**Our company:** Access to personal information within Notamedia and our group of companies is restricted to those individuals who have a need to access the information for our business purposes.

**Suppliers, subcontractors:** We keep your information confidential, but may disclose it to suppliers or subcontractors insofar as it is reasonably necessary for the purposes set out in this privacy policy. However, this is on the basis that they have agreed to safeguard this information.

**Our service providers:** This includes external third-party service providers, such as accountants, auditors, lawyers and other outside professionals, on the basis that they have agreed to safeguard this information.

**Government authorities**: we may disclose your information to the extent that we are required to do so by law, which may include government bodies and law enforcement agencies.

We will process your personal information, with your consent, only if it is in our **legitimate interest** to do so and when these interests are not overridden by your data protection rights. Those legitimate interests include keeping you informed on our developments; how this may relate to you and your organization and how Notamedia is evolving to match these developments; how we are delivering our current solution to our customers; how we are improving existing products and developing new ones.

If our information practices change at any time in the future, we will post the policy changes to the Site, to this Privacy Policy, so that you may opt out of the new information practices. We suggest that you check the Site periodically if you are concerned about how your information is used.

#### **III. HOW WE PROTECT INFORMATION**

We implement security measures designed to protect your Personal Data Information from unauthorized access. We further protect your information from potential security breaches by implementing certain technological security measures including encryption, firewalls and secure socket layer technology.

## IV. YOUR RIGHTS REGARDING THE USE OF YOUR PERSONAL DATA INFORMATION

Your rights to access and control your data will be defined and agreed on under the relevant separate Agreement with you as a customer. Notamedia has implemented the appropriate processes and systems to ensure compliance with these rights. Furthermore, we will provide our customers with reasonable co-operation and assistance in carrying out privacy impact assessments or otherwise to demonstrate compliance with Data Protection Legislation. On notification of a potential or actual data security breach,

Notamedia would provide the reasonable and appropriate co-operation and assistance necessary to fully investigate such a breach.

You have the following rights over the way we process personal data relating to you:

Request a copy of data we are processing about you and have any inaccuracies corrected. We will use reasonable efforts to the extent required by law to supply, correct or delete personal information held about you on our files.

You can ask us to restrict, stop processing, or to delete your personal data. There may be several reasons for this including but not limited to i) you consented to Notamedia processing the personal data and have since withdrawn that consent; ii) Notamedia no longer needs to process that personal data for the reason it was collected; iii) you need the personal data to be deleted in order to comply with a legal obligation.

#### **V. DATA RETENTION**

Notamedia will hold personal data to the extent needed to deliver its Product under the customer Agreement. On the customer's request, Notamedia will return or destroy all personal data it has in its possession and delete existing copies. However, we will retain your Personal Data Information:

- to the extent that we are required to do so by law;
- if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
- in order to establish, exercise, or defend our legal rights.

We will cease use of your data for marketing purposes where we have not communicated with you for more than 2 years.

## **VI. INFORMATION SECURITY**

Information security is of the utmost importance and at the heart of the Notamedia values. At Notamedia, we take all reasonable and appropriate technical and organizational measures to prevent unauthorized or unlawful processing of data, and accidental loss or destruction of data, taking accounting of the harm that might result from such unauthorized or unlawful processing or accidental loss, or destruction of the data to be protected.

We take all reasonable steps to ensure the reliability of all our personnel who have access to the data. We ensure that any person authorized to process data in connection with the customer Agreement is subject to our duty of confidentiality.

#### **VII. LINKS TO OTHER WEBSITES**

As part of the Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through the Site and the Service. Therefore, this Privacy Policy does not apply to your use of a third party website accessed by selecting a link on our Site or via our Service. To the extent that you access or use the Service through or on another website, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.

## **VIII. CHANGES TO OUR PRIVACY POLICY**

The Company reserves the right to change this policy and our Terms of Service at any time. We will notify you of significant changes to our Privacy Policy by sending a notice to the primary email address specified in your account or by placing a prominent notice on our site. Changes will go into effect 30 days following such notification. You should periodically check the Site and this privacy page for updates.

#### IX. HOW TO CONTACT US

If you wish to talk through anything in this privacy policy, find out more about your rights or obtain a copy of the information we hold about you, please contact our support team at info@atlaschain.ru who will be happy to help. If you wish to raise a complaint on how we have handled your personal data, you can contact our data protection officer who will investigate the matter.

Our data protection officer can be contacted by emailing:

sales@notamedia.com

Last Updated: This Privacy Policy was last updated on 19/01/2021.