

PRIVACY POLICY AND CONSENT TO USER PERSONAL DATA PROCESSING

The "Privacy and Personal Data Processing Policy" (hereinafter the Policy) is a document that defines the procedure for processing, systematization, and disclosure of personal information provided by the user of the Internet network (hereinafter - the User), who visited the site, available on the network under the unique domain name <https://apex-boosting.com> (hereinafter - the Site). The copyright holder of the Site and the Operator of personal data is Aleksei Chepuriaev as a sole proprietor (Organizational form: Individual Entrepreneur Expert Boosting Identification number: 304632538; Registration number and Date: 27.10.2022; Registering authority: NAPR National Agency of Public Registry, Legal address: Georgia, Tbilisi, Saburtalo District, Kakha Shevardenidze St., N 5, flat N24), owning rights to the site.

GENERAL PROVISIONS

1.1. By leaving data on the Site, the User gives the Operator his unconditional consent to the processing of his personal information, both uploaded by the User himself and received by the Operator in automated mode, as a result of the User's actions.

1.2. Personal information is understood as the information uploaded by the User on the Site, as well as obtained in the process of using the Site, personal information that allows identifying the User, as a physical person - a subject of legal relations.

1.3. For any contacts with the Operator, the User should use the initially specified email address or mobile phone number.

1.4. Any personal information uploaded by the User on the Site is perceived by the Operator "as is" and is not subject to preliminary verification for accuracy. The burden of responsibility for the accuracy of the information provided on the Site lies with the User personally.

1.5. When disclosing or providing information, the Operator complies with the confidentiality requirements established by the Georgian Law "On the Protection of

Personal Data".

1.6. The Operator may also carry out automated processing of the information provided by the User.

PROCESSED DATA

2.1. The User gives the Operator his unconditional consent to process the following data:

2.1.1. The User's email address;

2.1.2. The User's contact phone number;

2.1.3. The User's account password.

2.2. All User data is used by the Operator exclusively for the purposes indicated in this Policy and stored until the User revokes his consent or the Site is closed (whichever occurs earlier).

PURPOSE AND PRINCIPLES OF DATA PROCESSING

3.1. The processing of the User's email information is carried out for the purposes of:

3.1.1. Providing the User with an account on the Site;

3.1.2. Providing access to the user database of the service in accordance with the Site interface;

3.1.3. Providing a service that grants access to closed sections of the site;

3.1.4. Sending the User marketing information from the Operator, including sending newsletters related to the Site, information about the Operator's promotions, and other similar information.

3.2. The processing of personal information is based on:

3.2.1. The principles of legality and fairness;

3.2.2. Processing only such information that meets the purposes of its processing;

3.2.3. The consistency of the content and volume of the processed information with the stated processing purposes.

3.3. The Operator also has the right to use the User's personal information for purposes that do not contradict the current legislation of Georgia.

3.4. The User agrees that the processed personal information is not excessive in relation to the stated purposes of its processing.

TRANSFER AND REMOVAL OF DATA

4.1. When adding information to the Site, as well as in the process of using it, such information does not become publicly available.

4.2. The Operator does not collect, store, and process the User's payment instrument data; such data is processed directly by banks and other payment services that have the appropriate licenses and certificates to carry out such activities.

4.3. The Operator transfers the User's personal information only in cases directly provided for by the legislation of Georgia and international agreements.

4.4. Providing personal information of Users at the request of state authorities (local government bodies) is carried out in the manner provided for by the legislation of Georgia.

4.5. The information posted by the User on the Site is stored for the entire period of use of the Site, and when the User applies to delete his data, within the period determined by the

Operator, but not more than 6 (six) months from the date of receipt of the corresponding User's application.

ENSURING THE SECURITY OF DATA PROCESSING

5.1. The Operator takes technical and legal measures to ensure the protection of the User's personal information from unlawful or accidental access to them, destruction, modification, blocking, copying, distribution, as well as from other unlawful actions.

5.2. To ensure the security of personal information, the Operator carries out the following measures:

5.2.1. Security threats to personal information are identified during its processing on the Site;

5.2.2. Organizational and technical measures are applied to ensure the security of personal information during its processing;

5.2.3. Information security tools that have undergone the established compliance assessment procedure are used;

5.2.4. An assessment of the effectiveness of measures taken to ensure the security of personal information is conducted;

5.2.5. Procedures are adopted to detect unauthorized access to personal information;

5.2.6. Restoration of personal information modified or destroyed due to unauthorized access to it is carried out;

5.2.7. Rules for access to personal information processed on the Site are established, and registration and accounting of all actions performed with personal information on the Site are ensured;

5.2.8. Continuous control over the measures taken to ensure the security of personal information is carried out.

5.3. The Operator is not responsible for the actions of third parties who have gained access to the User's personal information as a result of unauthorized access to the Site, and also as a result of other unlawful actions committed by third parties, when the Operator could not

foresee or prevent them.

FINAL PROVISIONS

6.1. This document is publicly available, its current version is always located on the Site page at the link – <https://apex-boosting.com/privacy-policy.pdf>

6.2. The Operator has the right to unilaterally change the text of the Policy, without prior notice to the User. The responsibility for timely acquaintance with the current version of the "Privacy Policy" lies entirely with the User.

6.3. The Policy is an integral part of the user agreement published on the Site pages. The User must fully familiarize himself with this Policy before registering on the Site. The User's registration on the Site means the User's full and unconditional acceptance of this Policy and consent to the collection, storage, and processing of his personal information, both uploaded by the User himself and obtained by the Operator in an automated mode, as a result of the User's actions. All disagreements and disputes arising in connection with the use of the User's personal information are resolved in the manner provided for by the user agreement.