

APPROVED

**General meetings of participants
INFO SAPIENS LLC
Protocol No. 21/02/2022-1 dated 21.02.2022**

PRIVACY POLICY AND PERSONAL DATA PROTECTION INFO SAPIENS LLC (hereinafter - Privacy Policy)

In this Privacy Policy, references to "Info Sapiens", "we", "us", "our", "us" mean INFO SAPIENS LLC (a company registered in Ukraine on September 4, 2018, EDRPOU code 42436094, located in 34 L. Ukrainki Blvd., Kyiv, Ukraine).

This Privacy Policy is adopted in order to establish measures for the protection of personal data, as well as for the purpose of ensuring compliance with the national legislation and international regulations for personal data protection during the implementation of Info Sapiens research.

This Privacy Policy applies to anyone who participates in research conducted directly by Info Sapiens or by third parties commissioned by Info Sapiens. At the same time, these third parties may also have their own privacy policies (other similar documents) that apply when collecting information.

We have developed this Privacy Policy to tell you:

- what personal data is;
- what personal data we collect about you;
- how and why we use them;
- to whom we transfer your personal data;
- how we protect the privacy of your personal data;
- how to contact us and who to contact if you have any questions regarding the processing of your personal data.

PERSONAL DATA PROTECTION STATEMENT

We take the security of personal data of our respondents very seriously, so we strive to protect the privacy of your personal data. Info Sapiens undertakes to take all necessary measures to prevent misuse of your personal data that becomes known to us. We will process your personal data in strict accordance with the requirements of the current legislation and only if there are legal grounds for such processing.

You are not obliged to provide us with personal data, but without particular information about you, you will not be able to be a respondent in a certain study.

In the event that we control the methods of collecting your personal data and determine the purposes for which this personal data is used, Info Sapiens acts as a "data controller" for the purposes of the EU General Data Protection Regulation 2016/679 (EU General Data Protection Regulation, hereinafter "GDPR") and other applicable European legislation on data protection, as well as the "owner of personal data" within the meaning of the Law of Ukraine on "Protection of Personal Data" dated June 1, 2010 No. 2297-VI.

We process your personal data only if one of the conditions specified in the Article 6 of the GDPR is met, including but not limited to:

- You have given your consent to the processing of personal data;
- such processing is required by law.

In the case of processing a special category of personal data (for example, health data), at least one of the conditions specified in the Article 9 of the GDPR must be met (for example, explicit consent to the provision of such data, or the processing is necessary for archival purposes in public information, for scientific or historical research purposes or for statistical purposes).

We may periodically update the Privacy Policy, including as required by applicable law. Therefore, we ask you to visit the website <https://www.sapiens.com.ua/> to make sure that you have up-to-date information.

1. BASIC CONCEPTS (TERMS)

Personal data is any information of a personal nature that allows a third party to identify a natural person (data subject).

Special categories of personal data are the so-called "sensitive" personal data that can harm the data subject at work, in an educational institution, in the living environment, or can lead to his discrimination in society. For example, this is personal data that contain the information about racial origin, political or religious views, trade union membership, health, sex life, biometric or genetic data. In the terminology of Ukrainian legislation, these are the personal data, the processing of which carries a particular risk for the personal data subjects.

Personal data subject means a natural person to whom the personal data refer and who can be identified or who is already identified by these personal data.

Respondent is a natural person participating in a public opinion survey.

Personal data controller is a natural or legal person that determines the purposes and means of personal data processing and is primarily responsible for their processing. The controller of personal data is the "owner of personal data" in the terminology of Ukrainian legislation.

Personal data processor is a natural or legal person that, on the basis of instructions (instructions, orders) of the controller, processes personal data for the controller. A personal data processor is a "personal data administrator" in the terminology of Ukrainian legislation.

Personal data processing is any operation or set of operations performed with personal data or arrays of personal data with or without the use of automatic procedures, such as collection, recording, systematization, structuring, storage, modification, arrangement, review, use, distribution or any other type of access to third parties, including the employees of the controller or processor of personal data, as well as deletion.

2. LEGISLATION REGULATING THE PROCESSING OF PERSONAL DATA

Personal data is processed in accordance with the requirements of the Law of Ukraine "On the Protection of Personal Data". The processing of personal data of respondents who are in the EU, is regulated, in particular, by the EU General Data Protection Regulation 2016/679 (hereinafter - "GDPR"). Also the legislation of the countries in which we conduct research.

3. PURPOSES OF PERSONAL DATA PROCESSING

Info Sapiens processes personal data in order to conduct public opinion research (study of public opinion on political, economic and social events, statistical analysis of results) and market situation research (study of market potential, awareness, acceptability of products, popularity of certain goods and services and purchasing habits of consumers in order to promote sales and develop new types of goods and services, including statistical analysis of results).

We ask you to provide only those personal data that are necessary for conducting a certain study. At the same time, if you decide to provide us with additional personal data, we will also be able to process it with the necessary level of protection.

4. PERSONAL DATA WE PROCESS

The processing of personal data is subject to participation in research conducted by Info Sapiens or third parties at the request of Info Sapiens. The amount of personal data and their type depends on the topic and method of research. We may also ask you to leave your personal data for the purpose of participating in future research, and you have the option to opt out at any time.

In addition to the above, we may process any other personal data if you voluntarily provide them to Info Sapiens.

If the storage of your personal data is not necessary to achieve the purposes of the processing and is not required by law, we will delete them.

5. SPECIAL (SENSITIVE) DATA CATEGORIES

As a rule, we do not collect special data categories about our respondents, and when we do, we try to minimize their use and process them with extreme care.

When conducting certain studies, we may process personal data that can be used to determine your physical or mental health. Such information refers to special or sensitive personal data in accordance with the law. We collect this personal data only if it is directly necessary to conduct a specific study.

If you do not allow us to process any special categories of personal data, this may mean that you will not be able to participate in the study.

6. PROTECTION OF PERSONAL DATA OF CHILDREN

We are aware of the importance of special protection of children's personal data. Info Sapiens conducts research in various fields and therefore conducts research involving children based on its own Child Protection Policy. Consent to the processing of children's personal data is obtained from their legal representatives.

7. PLACE OF STORAGE OF PERSONAL DATA

In order to ensure the security of personal data, we use the cloud services of Hetzner Online GmbH (Industriestr. 25, 91710 Gunzenhausen Germany). Data stored by Hetzner Online GmbH are located in data processing centers in Germany.

Some databases of personal data processed by Info Sapiens are hosted on its own servers located in the office in Ukraine: Kyiv, 34 L. Ukrainki Blvd.

8. TRANSFER OF YOUR PERSONAL DATA TO THIRD PARTIES

The transfer of personal data to third parties is possible only with the consent or on the grounds provided by the current legislation.

9. TECHNICAL, ORGANIZATIONAL AND OTHER DATA PROTECTION MEANS

In order to securely store personal data, we have implemented a number of technical and organizational measures that protect personal data from unauthorized or unlawful processing and from accidental loss, destruction or damage.

Info Sapiens adheres to the principle of minimizing personal data. We process only the information about you that we need in order to carry out a certain study, or the information that you provide with your consent beyond the necessary processing. As a rule, Info Sapiens processes your personal data only at the stage of data collection and at the stage of quality control of research.

When transferring personal data to third parties, we always use the most secure and proven ways of transferring such data.

10. PERSONAL DATA PROCESSING (STORAGE) TIME

We will not store your data longer than it is necessary to fulfill the purpose for which it is processed, or to comply with legal requirements.

In order to determine the appropriate storage period, we determine the nature and category of personal data, the purposes for which we process it, and whether we can achieve those purposes by other means.

As a general rule, the time limit for processing personal data in Info Sapiens does not exceed 90 days from the moment of completion of the relevant research.

We may minimize the personal data we use over time, or we may even anonymize the data so that it can no longer be linked to you personally. In this case, we will be able to use this information for statistical or other purposes without further informing you, since such information will cease to be personal data.

11. COOKIES AND OTHER TRACKING TECHNOLOGIES

Cookies are small text files that websites store on your computer or mobile device when you start using them. Our cookies by themselves do not identify an individual user, but only identify the computer or mobile device you are using.

Cookies and other tracking technologies on our website and applications may be used in various ways, for example for the purpose of operating the website, analyzing traffic or for

advertising purposes. We use cookies and other tracking technologies, in particular, to improve the quality and efficiency of our services.

For more information about what cookies are, how they work, how to manage them or how to delete them, go to www.allaboutcookies.org.

We shall inform you that in the settings of some Internet browsers, you can configure the prohibition of cookies and other tracking technologies. At the same time, you should understand that if you disable some cookies, the functionality of the Info Sapiens website may be limited and you may not be able to use all its advantages, as well as incorrect operation is possible.

12. RIGHTS OF PERSONAL DATA SUBJECTS

1. Rights of personal data subjects in accordance with the legislation of Ukraine

We are pleased to inform you about your rights regarding the processing of personal data in accordance with the legislation of Ukraine:

- know about the sources of collection, the location of your personal data, the purposes of their processing, the location or place of residence (residence) of the owner or manager of personal data or to give the appropriate instructions to receive this information to persons authorized by them, except for cases established by law;
- receive information about the conditions for providing access to personal data, including the information about third parties to whom personal data is provided;
- access your personal data;
- receive no later than thirty calendar days from the date of receipt of the request, except for cases provided by law, an answer on whether his personal data is being processed, and also receive the content of such personal data;
- submit a motivated demand to the owner of personal data with an objection to the processing of your personal data;
- submit a motivated demand for the change or destruction of your personal data by any owner and manager of personal data, if these data are processed illegally or are unreliable;
- protect your personal data from illegal processing and accidental loss, destruction, damage due to intentional concealment, failure to provide or untimely provision of data, as well as protection from providing information that is unreliable or defames the honor, dignity and business reputation of a natural person;
- file complaints about the processing of your personal data to the Human Rights Commissioner of the Verkhovna Rada of Ukraine or to the court;
- apply legal remedies in case of violation of the legislation on the protection of personal data;
- introduce a clause on the limitation of the right to process one's personal data when giving consent;
- withdraw consent to the processing of personal data;
- know the mechanism of automatic processing of personal data;
- to protect against an automated decision that has legal consequences for him.

2. Other rights of personal data subjects in accordance with the GDPR

In addition to the Ukrainian legislation on the protection of personal data, Info Sapiens is careful to ensure your rights established by the GDPR, including:

1. The right to information

We are ready to provide data subjects with the information on which of their personal data we process.

If you would like to know which of your personal data we process, you can request this information at any time, including by contacting Info Sapiens. You can find the list of data that we must provide to you in the Articles 13 and 14 of the GDPR. At the same time, during the application, you should inform us of your specific requirements so that we can legally consider your request and provide an answer.

Please note that in the event that we are unable to verify your identity through an exchange of electronic messages or when you contact us over the phone, or in case of reasonable doubts about your identity, we may ask you to provide an identity document. Only in this way we will be able to avoid disclosing your personal data to a person who can impersonate you.

We will process requests as soon as possible, but at the same time, please remember that providing a complete and legal answer regarding personal data is a complex process that can take up to a month.

2. The right to correct data about you

If you find that some of the personal data we are processing about you are incorrect or out of date, please let us know. In this case, we may ask you to provide an identity document.

In some cases, we will not be able to change your personal data. In particular, this may be the case when your personal data have already been anonymized or destroyed.

3. Withdrawal of consent to the processing of personal data and the right to be forgotten

If Info Sapiens processes your personal data on the basis of consent to the processing of personal data, further processing can be stopped at any time. It is sufficient to withdraw consent to such processing.

4. The right to be forgotten.

In the cases provided for in Art. 17 GDPR, Info Sapiens will destroy your personal data that it processes, with the exception of those personal data that we are obliged to keep in accordance with the requirements of the law.

Likewise, in this case, for security purposes, Info Sapiens may ask you to provide an identity document.

12. WHO YOU CAN CONTACT FOR THE PROTECTION OF YOUR PERSONAL DATA

Phone: +38 066 410 57 63.

Email: personaldata@sapiens.com.ua

Address: p.o. box. #4, 34 L. Ukrainki Blvd., Kyiv, Ukraine,

Make sure to include your first name, last name, address (in the case of an electronic request, your email address) in all correspondence, as well as detailed questions, comments, complaints or demands.

Personal data protection authority in Ukraine

The administrative body for the protection of personal data in Ukraine is the Office for Protection of Personal Data of the Secretariat of the Commissioner of the Verkhovna Rada of Ukraine for Human Rights. You can contact him with complaints or suggestions if you believe that your rights have been violated in connection with personal data processing.