

## PRIVACY AND CONFIDENTIALITY POLICY

### GENERAL PROVISIONS

In order to improve the quality of service and ensure the safety of our users' data, we inform you about the specific data we collect and how we use it. We treat confidential information of any person visiting our website with respect, therefore, based on the requirements of the current legislation of Ukraine and the regulations of the European Parliament and Council, we have prepared this Privacy and Confidentiality Policy (hereinafter referred to as the "Policy").

The Policy describes STRATTON's approach to the processing of personal data of individuals who use the website <https://stratton.ua/> and/or intend to receive or receive services from STRATTON.

STRATTON processes the personal data of Users based on the informed and freely given consent of the data subject to the processing of their personal data when using the STRATTON website or receiving STRATTON services by checking the corresponding "consent box". By checking the appropriate "consent box," you are deemed to have accepted the terms of this Policy and provided STRATTON with legal grounds for the processing of personal data. You also confirm that you have familiarized yourself with the terms of this Policy and the rights granted to data subjects in accordance with Article 8 of the Law of Ukraine "On Personal Data Protection" and agree with us.

STRATTON - Limited Liability Company "STRATTON ANALYTICS," specializing in providing services in the field of digital marketing. Legal address: Antonovycha Street 48B, Office 14, Kyiv, Ukraine. Email address: [info@stratton.com.ua](mailto:info@stratton.com.ua), contact phone: +380 44 22 777 02.

User - any capable individual - a data subject who intends to receive or receives Services and/or uses the website <https://stratton.ua/>.

Personal data - information or a set of information about an identified or identifiable individual.

Confidential information - a set of information and data that the User provides to STRATTON in connection with the use of the website, receipt of Services from STRATTON, including:

### LIST OF PERSONAL DATA

STRATTON, for the purpose of providing Services and/or during the provision of Services, when visiting the website <https://stratton.ua/>, may process the following personal data of the User: name, surname, patronymic; date of birth; email address; phone number; information about the mobile device, including IP address, geographical location, date and time of visits to the STRATTON website, cookie files, browser information, technical specifications of the equipment, software, page request addresses; information about website visits and usage; any other data voluntarily provided by the User.

STRATTON has the right to:

- Collect the personal data provided by Users and process them in accordance with the purpose and legal basis defined in the Policy.
- Accumulate and systematize personal data.
- Disclose personal data to third parties.
- Provide access to personal data without the User's consent in cases provided by the legislation of Ukraine.
- Make changes to or delete personal data upon receiving requests, letters, or demands from Users.
- Make changes to this Policy.
- Exercise other rights provided by the legislation of Ukraine.

## **GOALS, PURPOSE OF PROCESSING**

The purposes and objectives of processing personal data include:

Identification of the User. Personalization of the website <https://stratton.ua/> for the User to enhance the user experience and utilize the services on the website. Advertising and marketing activities. Improvement of service delivery. Administration of the website <https://stratton.ua/> and the business operations. Negotiations regarding the provision of services. Conclusion and execution of service agreements. Sending email notifications. Handling requests and complaints. Any other purpose that is not contrary to the legislation of Ukraine. When using personal data for direct marketing purposes (commercial newsletters and marketing messages about new products, services, and offers that we believe may be of interest to you), we include a link where you can unsubscribe from such communications in the future.

## **USER RIGHTS. DELETION AND MODIFICATION OF PERSONAL DATA**

The user has the right to request access to personal data and their correction, deletion, erasure, modification, restriction of processing with respect to the data subject, or to object to processing. The user has the right to withdraw consent to the processing of personal data, the right to lodge a complaint with the supervisory authority, the right to receive data in a format that allows their use in other online platforms and services (right to data portability).

The user has the right to know the sources of collection, the location of their personal data, the purpose, and the legal basis for their processing. The user has the right to opt out of receiving email newsletters and other marketing communications from STRATTON. Requests and complaints can be made by the user through electronic mail to the address [info@stratton.com.ua](mailto:info@stratton.com.ua).

# **stratton**

In case of receiving a notification regarding the withdrawal of consent and the destruction of personal data, STRATTON undertakes to destroy such data within 30 days from the moment of user identification. Please note that the operation of certain components of the website <https://stratton.ua/> that require the presence of your personal data may be terminated upon their deletion.

## **TRANSFER OF PERSONAL DATA**

If necessary, personal data may be disclosed by STRATTON to ensure the activities of STRATTON and fulfill the purpose of processing personal data to the following third parties: any of our employees, officials, professional consultants, government agencies, and other authorities of Ukraine and other countries; third parties that carry out customer traffic analysis for STRATTON (e.g., Google Analytics), and so on.

This list is not exhaustive and may be expanded if necessary solely for the purpose of providing services by STRATTON, with prior notification to the user.

## **PERIOD OF PERSONAL DATA RETENTION**

STRATTON retains and processes personal data for an indefinite period of time in order to fulfill the purpose defined in the Privacy Policy or until a request for deletion of personal data is received.

## **USE OF COOKIE FILES**

STRATTON uses cookie files to remember the type of browser and operating system, the page from which the visitor came to the current one, the path through the pages on this website, and the domain of the internet service provider to understand how users utilize the site. STRATTON uses cookie files to remember user settings and preferences. Cookie files are also used to improve site navigation and provide more relevant information to the user. By checking the corresponding "consent box," you allow us to use cookie files each time you use the STRATTON website.

## **CONFIDENTIALITY AND DATA SECURITY. WARRANTIES**

STRATTON guarantees the utmost confidentiality, meaning that Confidential Information will not be disclosed to any third parties in any way and will only be used for the purpose of providing STRATTON services. STRATTON takes appropriate measures to ensure the security and protection of data, including personal data, against unauthorized access, disclosure, alteration, or destruction. However, it is important to note that no data transmission or storage method can be guaranteed to be 100% secure. Therefore, while STRATTON strives to protect your information, it cannot provide an absolute guarantee of data security.