

## PRIVACY POLICY

This Privacy Policy, as amended or otherwise changed from time to time (the "Privacy Policy"), explains the manner in which DigiRepresent Services OU (hereinafter "Enty") maintains and discloses user information obtained through its website [www.enty.io](http://www.enty.io) (the "Site"). The terms "we," "us," and "our" refer to Enty. By using the Site, you ("User") consent to the data practices prescribed in this Privacy Policy.

On occasion, Enty may revise this Privacy Policy to reflect changes in the law, our personal data collection and use practices, the features on the Site, or advances in technology. If material changes are made to this Privacy Policy, the changes will be prominently posted on the Site.

### **What if I do not want to accept this Privacy policy?**

By using this Site, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed as your acceptance of those changes.

If you have already registered an account, you can find out how to terminate or cancel your account here.

### **What information does Enty collect?**

We collect Personal Data and Anonymous Data, as described below.

We may collect Personal Data from you, such as:

- your first and last name;
- e-mail and mailing addresses;
- date of birth;
- government-issued identification;
- photos;
- information about the financial statement;
- information about working status;
- gender;
- utility bills;
- phone number.

If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.

Some information is collected automatically by our servers:

- Our servers (which may be hosted by a third-party service provider) collect information from you, including your browser type, operating system, Internet Protocol ("IP") address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit.
- As is true of most websites, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider ("ISP"), referring/exit pages, operating system, date/time stamp, and clickstream data.
- Like many online services, we use cookies to collect information. "Cookies" are small pieces of information that a website sends to your computer's hard drive while you are viewing the website.
- We retain information on your behalf, such as transactional data and other session data linked to your Account.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

## **How does Enty use the information it collects?**

In general, Personal Data you submit is necessary for a company incorporation process: we collect your data and transfer it to our partners that will help you with incorporation. Our partners need such data to comply with AML/CFT legislation and for completing necessary documents for you. Also, we use your Personal Data in the following ways:

- facilitate the creation of and secure your Account on our network;
- identify you and perform identity verification through a service provider;
- provide improved administration of our Site and Services;
- improve the quality of experience when you interact with our Site and Services;
- send you a welcome e-mail to verify ownership of the e-mail address provided when your Account was created;
- send you administrative e-mail notifications, such as account activity, transaction processing, security or support and maintenance advisories;
- identify, prevent, and report potentially suspicious, fraudulent, or illegal activities;
- notify you about important changes to our Terms and Conditions;
- respond to your inquiries related to employment opportunities or other requests.

Enty does not sell user and / or Anonymous Data to any third party.

## **Marketing and newsletter subscriptions**

We collect information about your behaviour within the application to offer you interesting information and offers regarding our services and products. This information includes your profile information, transaction history and user status. This information is processed automatically and you as a user will notice it by seeing more relevant content when signed in. We do not share this information with third parties. The processing of such personal data is based on our legitimate interest to develop and promote our services and products.

If you have subscribed to our mailing list, we will send you information on our new activities, events and products. We can also send special offers directed to a special user group, users of a certain region, etc. Adding you on our mailing lists is based on your consent. You may also unsubscribe from the mailing list anytime by clicking the unsubscribe link at the bottom of each message.

## **Customer support**

In case you need to contact our customer support, our support personnel will handle your contact information and the contents of your communication. Please do not share any sensitive data in your communication with our customer support. You can contact our customer support through various means. Depending on the means of communication you choose, we'll process the following contact details: - Your IP address (chat support) - Phone number (phone support, SMS support) - Email (email support) - User ID of an instant messaging app (QR code, support through an instant messaging app). We keep a record of the contents of the support tickets to make sure that you receive quality service and to develop our products and services. If you contact us by calling our support number, please note that we also record the phone calls for the same purposes. The processing of your personal data in connection with your communication with our customer service is based on the service agreement between you and Enty as well as our legitimate interest to follow up on the quality of our customer service, to verify the actions taken based on your request and to develop our service in the future.

## **How does Enty share my Personal Data?**

It may be necessary to disclose your information to comply with any law, court orders, or government request, defend against claims, investigate or bring legal action against illegal or suspected illegal activities, enforce our Terms, or to protect the rights, safety, and security of Enty, our users, or the public.

We may share your Personal Data with third-party service providers to provide you with the services that we offer you through our Site; These third-party service providers are required not to use your Personal Data other than to provide the services requested by you.

Other than as stated in this Privacy Policy, Enty does not disclose any of your personal information to third parties unless required to do so by law enforcement, court order, or in compliance with legal reporting obligations.

Our customer service is taken care of an external service provider Freshdesk, which operates mainly from Virginia, USA. We also use an external processor for data centre and colocation services.

All third-party service providers that we share your data with shall be requested to only process your data in accordance with instructions from us and comply fully with this Privacy Notice, any applicable data protection laws and any other appropriate confidentiality and security measures. We may also share your personal data with competent authorities when this is necessary to comply with a legal obligation, court order or comparable official order issued by an authorized authority.

We may share some or all of your Personal Data in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset.

If another company acquires our company, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy. The website may contain links to other third-party websites which are regulated by their own privacy policies. Enty is not responsible for the privacy policies of these third-party websites even if they were accessed using the links from our site.

#### **How long do we store your personal data?**

We keep the data you have provided to us on your user account for the whole period of your customer relationship and as long as it is necessary with regard to the purposed of the processing described above.

#### **How we transfer collected information internationally**

We may transfer the collected information we obtain from you to recipients in countries other than the country in which the information was originally collected. Those countries may not have the same data protection laws as the country in which you initially provided the information.

The collected information may be transferred to a destination outside the European Economic Area ("EEA"). All data transfers outside the EEA are made under agreements and include all necessary standard data protection clauses adopted by a supervisory authority. These providers acting in a fully-compliant manner with GDPR.

#### **What legal rights do you have in relation to your information?**

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

#### **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data.

However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. Please note that in certain circumstances it may be still lawful for us to continue processing your information even where you have withdrawn your consent if one of the other legal bases is applicable.

### **How can you send requests regarding your information?**

You can make a request regarding your information by emailing [support@Enty.io](mailto:support@Enty.io).

Unless you have made a corresponding request, we will retain your information for as long as your Account has not been closed or as needed to provide you access to your Account.

If you wish to close your Account, open a ticket in our support centre. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our Terms.

### **Where do we store your Personal Data?**

The information we collect is primarily stored on secure servers provided by Leaseweb and backed up to an online Cloud which is geographically located in Frankfurt, Germany. We will take all steps reasonably necessary to ensure that personal information is treated securely and in accordance with this Privacy Policy and that any third parties that we share your information with are bound to employ similar organizational and technical measures to ensure your information's security.

### **What security precautions does Enty take to protect me?**

We take the protection of your personal information seriously. We use industry-standard data encryption technology and have implemented restrictions related to the storage of and the ability to access your personal information. However, despite all of our efforts, please note that no transmission over the Internet or method of electronic storage can be guaranteed to be 100% secure.

### **Contacting Us**

If you have any questions about our Privacy Policy as outlined above, please contact us at [support@Enty.io](mailto:support@Enty.io)