# JPM Analytics

### **Personal Data Processing Policy**

#### 1. General Provisions

This Personal Data Processing Policy has been developed in accordance with the applicable laws governing the protection of personal information. The document sets out the procedure for processing and measures to protect personal data applied by JPM Analytics (hereinafter referred to as the "Operator").

- 1.1. The main obligation of the Operator is to guarantee the protection of the rights and freedoms of individuals in the processing of personal data, including ensuring the right of everyone to privacy.
- 1.2. This Policy covers all information that the Operator may receive from users of the https://jpmanalytics.com website.

# 2. Interpretation of terms

- 2.1. Automated data processing is data processing using computer technology.
- 2.2. Data blocking is a temporary suspension of data processing, except in situations where data needs to be clarified.
- 2.3. Website is a set of information and graphic materials, databases and software components available on the Internet at https://jpmanalytics.com.
- 2.4. Data information system is a set of technologies and personal information contained in databases.
- 2.5. Data depersonalization is actions as a result of which it is impossible to determine the ownership of information by a specific person without additional information.
- 2.6. Data processing means any actions with personal information, including collection, registration, storage, modification, receipt, use, transfer, depersonalization, blocking, deletion and destruction.
- 2.7. Operator is an organization that processes personal data and is responsible for the expediency of such processing.
- 2.8. Personal data is information relating to users of the https://jpmanalytics.com website.
- 2.9. User any person who has visited the https://jpmanalytics.com website.
- 2.10. Provision of data disclosure of personal data to a limited number of persons.
- 2.11. Dissemination of data bringing data to an unlimited number of persons.
- 2.12. Data Destruction measures that entail the deletion of data with the impossibility of their subsequent restoration.



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### 3. Personal data processed by the Operator

- 3.1. Surname, name and patronymic of the client.
- 3.2. E-mail.
- 3.3. Telephone numbers for communication.
- 3.4. Information about the place and date of birth (day, month, year).
- 3.5. Place of residence and place of registration.
- 3.6. Collection and processing of anonymized user data (including cookies) using Internet analytics tools.
- 3.7. All of the above information is collected in this document under the name "Personal Data".

## 4. Purposes of personal data processing

The purposes of the processing of personal data are to notify the user (including by e-mail), as well as to provide the user with access to the materials and services of the website.

- 4.1. The Operator has the right to inform the user about new products, promotions, special offers and events. The user has the right to refuse to receive this information.
- 4.2. Personally identifiable data is collected in order to analyze user behavior on the site and improve the quality of its functioning.

### 5. Legal basis for processing

- 5.1. The processing of personal data is carried out only after the user independently and voluntarily enters them on the site, which is considered an expression of consent to this Policy.
- 5.2. The processing of anonymized data is allowed with the consent given by the user in the browser settings.

#### 6. Procedure for processing personal data

- 6.1. The Operator ensures the protection of data by applying all necessary technical and organizational measures.
- 6.2. The data is not disclosed to third parties, except as provided for by applicable law.
- 6.3. The User has the right to contact the Operator in order to clarify or update his data.
- 6.4. The period of storage/processing of data is not limited.

## 7. Transfer of data outside the country



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- 7.1. Before transferring personal data outside the country, the Operator will make sure that the recipient state ensures the proper protection of personal data.
- 7.2. The transfer of data outside the country is allowed only on the basis of the user's consent or on the basis of a concluded contract.
- 8. Final Provisions
- 8.1. Users have the right to send the Operator any questions related to the processing of personal data.
- 8.2. Amendments and additions to the Policy are published on the official website.
- 8.3. The current version of the Policy is available online.

