

# PRIVACY POLICY

## Doubly.io

This Privacy Policy applies to all information that the Doubly website [doubly.io](https://doubly.io) can receive about the User while using the company's website.

### 1. DEFINITION OF TERMS

1.1 The following terms are used in this Privacy Policy:

1.1.1. "Website Administration" means authorized employees of the website management, acting on behalf of Doubly, who organize and/or perform personal data processing, as well as determine the purposes of personal data processing, the composition of personal data to be processed, the actions (operations) performed with personal data.

1.1.2. "Personal data" means any information related to a person directly or indirectly determined by an individual (a subject of personal data).

1.1.3. "Personal data processing" means any action (operation) or set of actions (operations) performed using automation tools or without using such means with personal data, including collection, recording, systematization, accumulation, storage, updating (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

1.1.4. "Confidentiality of personal data" - a mandatory requirement for the Operator or other person who has access to a personal data to prevent their dissemination without the consent of the subject of personal data or other legal grounds.

1.1.5. "User" means a person who has access to the Website, through the Internet and using the Company's Website.

1.1.6. "Cookies" is a small piece of data sent by a web server and stored on a user's computer that the web client or web browser sends to the web server each time in an HTTP request when they try to open the page of the corresponding site.

1.1.7. "IP-address" is a unique network address of a node in a computer network built using the IP protocol.

### 2. GENERAL PROVISIONS

2.1. The User's use of the company's website means acceptance of this Privacy Policy and the terms of processing of the User's personal data.

2.2. In case of disagreement with the terms of the Privacy Policy, the User must stop using the company's website.

2.3. This Privacy Policy applies only to the Doubly website. The site of the company does not control and is not responsible for the sites of third parties to which the User can click on the links available on the company's website.

2.4. The website administration does not verify the authenticity of the personal data provided by the User to the company's website.

### 3. SUBJECT OF THE PRIVACY POLICY

3.1. This Privacy Policy establishes the obligations of the Administration of the company's website to not disclose and provide a regime for protecting the confidentiality of personal data that the User provides upon the request of the Website Administration when registering on the company's website.

3.2. Personal data authorized for processing under this Privacy Policy is provided by the User by filling out the registration form on the Doubly Website in the Registration section and includes the following information:

3.2.1. surname, name of the User;

3.2.2. contact phone number of the User;

3.2.3. e-mail address;

3.2.4. social accounts of the User;

3.3. The company's website protects data that is automatically transmitted during the block scanning and when visiting pages on which the statistical system script is installed:

- IP Address;
- information from cookies;
- information about the browser;
- access time;
- page address;
- User's activity on the page;
- referrer (address of the previous page).

3.3.1. Disabling cookies may result in the inability to access parts of the website of the company that require authorization.

3.3.2. The company's website collects statistics about the IP-addresses of its visitors. This information is used to identify and solve technical problems, to control the legality of financial transactions.

3.4. Any other personal information not specified above (transaction history, browsers and operating systems used, etc.) is subject to secure storage and non-distribution, except as provided in cl. 5.2. of this Privacy Policy.

#### **4. PURPOSE OF PERSONAL USER INFORMATION COLLECTION**

4.1. The administration of the company's website may use the User's Personal Data for purposes:

4.1.1. Identification of the User registered on the company's website for financial transactions remotely from Doubly.

- 4.1.2. Granting the User access to the personalized resources of the Company's website.
- 4.1.3. Association with feedback of the User, including sending notifications, information letters, inquiries regarding the use of the Company's website, rendering services, processing requests and applications from the User.
- 4.1.4. Determining the location of the User for security, prevention of fraud.
- 4.1.5. Confirmation of the authenticity and completeness of the personal data provided by the User.
- 4.1.6. Create an account for financial transactions, if the User has agreed to create an account.
- 4.1.7. Notifications to the User from the company's Website about news and actions.
- 4.1.8. Processing financial operations of the User.
- 4.1.9. Granting effective client and technical support to the User in the event of problems related to the use of the Company's Website.
- 4.1.10. Providing the User special offers, information on financial transactions, newsletters and other information on behalf of the company's website, by means of e-mails and SMS.
- 4.1.11. Implementation of advertising activities with the consent of the User.

## **5. METHODS AND TERMS OF PERSONAL INFORMATION PROCESSING**

- 5.1. The processing of the User's personal data is carried out without any time limit, in any legal way, including in personal data information systems using automation tools or without using such means.
- 5.2. The User agrees that the Website Administration has the right to transfer personal data to third parties, in particular, electronic mailing services for letters and SMS, solely for the purpose of fulfilling the obligations of the company to the User.
- 5.3. In case of loss or disclosure of personal data, the Website Administration informs the User about the loss or disclosure of personal data.
- 5.4. The Website Administration takes necessary organizational and technical measures to protect the User's personal information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.
- 5.5. Website Administration together with the User takes all necessary measures to prevent loss of funds or other negative consequences caused by loss or disclosure of the User's personal data.

## **6. OBLIGATIONS OF THE PARTIES**

## **6.1. The User is obliged to:**

6.1.1. Provide information about the personal data required for the use of the Company's Website.

6.1.2. Update, supplement the provided information about personal data in case of changing this information.

## **6.2. The Website Administration is obliged to:**

6.2.1. Use the information received solely for the purposes specified in cl. 4 of this Privacy Policy.

6.2.2. Ensure that confidential information is kept secret, not to disclose without the prior written permission of the User, as well as not to sell, exchange, publish or disclose other personal data of the User, except for cl. 5.2. of this Privacy Policy.

6.2.3. Take precautions to protect the privacy of the User's personal data in accordance with the procedure normally used to protect such information in the existing business.

6.2.4. Block personal data related to the relevant User from the moment of request or request of the User or his legal representative or authorized body for protection of the rights of subjects of personal data for the verification period, in case of revealing unreliable personal data or illegal actions.

## **7. LIABILITY OF THE PARTIES**

7.1. The Website Administration, which has not fulfilled its obligations, is liable for losses incurred by the User in connection with the misuse of personal data.

7.2. In case of loss or disclosure of Confidential Information, the Website Administration is not responsible if this confidential information:

7.2.1. Became public property before its loss or disclosure.

7.2.2. Was received from a third party until it was received by the Website Administration.

7.2.3. Was disclosed with the consent of the User.

## **8. DISPUTE RESOLUTION**

8.1. Before applying to the court with a claim for disputes arising from the relationship between the User of the company's website and the Website Administration, it is mandatory to file a claim (a written proposal for the voluntary settlement of the dispute).

8.2. The receiver of the claim within 30 calendar days from the date of receipt of the claim, shall notify the applicant in writing of the claim about the results of the examination of the claim.

8.3. If the agreement is not reached, the dispute will be referred to the judicial authorities for consideration.

## **9. ADDITIONAL CONDITIONS**

9.1. The Website Administration has the right to make changes to this Privacy Policy without the consent of the User.

9.2. The new Privacy Policy comes into effect from the moment it is posted on the company's website, unless otherwise provided for in the new edition of the Privacy Policy.

9.3. Any suggestions or questions about this Privacy Policy should be reported to the technical support of the company's website.