

PRIVACY POLICY

OUR PRIVACY POLICY AT A GLANCE

1. WHO WE ARE. We are „DEVTEON“ and we process your personal data as controller. This means that we are responsible for how we process and protect your data.

2. WHAT WE USE YOUR DATA FOR. We will use your data (collected online or in person), among other purposes, to manage your purchases of services, to respond to your queries, and, if you wish, to send you our customised communications.

3. WHY WE USE YOUR DATA. We have legal standing to process your data for various reasons. The main reason is that we need to process your data to perform the contract that you accept with us when you filling out forms on our website and when you make a purchase or enjoy any of our services or functionalities. We also use your data for other reasons, for example, to respond to your queries.

4. WHO WE SHARE YOUR DATA WITH. We share your data with service providers who provide us with assistance or support, these being companies in the Devteon Group or third party providers

5. YOUR RIGHTS. You have the right to access, rectify or delete your personal data. In certain cases, you are also entitled to other rights, such as, for example, to object to us using your data, or to transferring your data, as explained in depth below.

We encourage you to read our full Privacy Policy below to understand in depth the manner in which we will use your personal data and your rights over your data.

BEFORE YOU START...

- In this Privacy Policy, you will find all relevant information applicable to our use of our users' and customers' personal data, regardless of the channel or means (online or in person) you use to interact with us.

- If you would like information about how we use cookies and similar devices, we recommend you consult the Cookies Policy.
- We are transparent about what we do with your personal data, to help you to understand the implications of the way in which we use your data, and the rights you are entitled to in relation to your data:
 - We permanently make available for you all the information included in this Privacy Policy, that you can check when you consider appropriate, and in addition,
 - you will also find further information on how we use your data as you with us.

1. WHO IS THE CONTROLLER OF YOUR DATA?

Your data controller is:

- **DEVTEON**, Personalized Software Company currently operating in Bulgaria - crafts software solutions tailored to your ideas.

In other words, **DEVTEON** (“We” or “Us”), is the Controller of the data. This means that we are responsible for processing and protecting your personal data.

SOME DEFINITIONS:

SERVICE means the <https://devteon.com> website services operated by “DEVTEON”.

USAGE DATA is data collected automatically either generated by the use of Service or from Service infrastructure itself (for example, the duration of a page visit).

COOKIES are small files stored on your device (computer or mobile device).

THE USER is the individual using our Service.

2. THE TYPES OF PERSONAL DATA COLLECTED

We collect personal information such as your name, contact details, email address, and any other information you provide when filling out forms on our website.

Additionally, we may collect technical data like your IP address, browser type, and browsing behavior for website improvement purposes.

3.COLLECTION OF PERSONAL DATA

WHEN AND HOW WE COLLECT PERSONAL DATA:

We collect personal data about Users from Users when Users:

- make an application through the Service or otherwise, adding personal data about themselves either personally or by using a third-party source;
- use the Service to connect with our staff, adding personal data about themselves either personally or by using a third-party source;
- provides identifiable data in the forms (provided through the website that uses the Service) and such data is of relevance to the application procedure;

PURPOSE OF DATA COLLECTION:

The data we collect is used to understand your needs and provide you with better service, particularly for internal record keeping, improving our products and services, periodically sending promotional emails about new products, special offers, or other information using the email address you have provided, and customizing the website according to your interests.

THE CONSENT OF DATA SUBJECT:

The User consents that personal data is collected through the Service, when Users:

- make an application through the Service, adding personal data about themselves either personally or by using a third-party source, and that Controller may use external sourcing-tools to add additional information;

The User consents to the personal data being collected in accordance with the above will be processed according to the below sections.

The User has the right to withdraw his or her consent at any time, by contacting Controller using the contact details listed in 9.

3. USERS ' RIGHTS

Users have the right to request information about the personal data that is processed by us, by notifying in writing, us using the contact details below under paragraph 9 below. Users have the right to one (1) copy of the processed personal data which belongs to them without any charge. For further demanded copies, Controller has a right to charge a reasonable fee on the basis of the administrative costs for such demand.

Users have the right to, if necessary, rectification of inaccurate personal data concerning that User, via a written request, using the contact details in paragraph 9 below.

The User has the right to demand deletion or restriction of processing, and the right to object to processing based on legitimate interest under certain circumstances.

The User has the right to revoke any consent to processing that has been given by the User to Controller.

The User has under certain circumstances a right to data portability, which means a right to get the personal data and transfer these to another controller as long as this does not negatively affect the rights and freedoms of others.

User has the right to lodge a complaint to the supervisory authority regarding the processing of personal data relating to him or her, if the User considers that the processing of personal data infringes the legal framework of privacy law.

4. DATA STORAGE AND SECURITY

We prioritize the personal integrity and therefore works actively so that the personal data of the Users are processed with utmost care. We take the measures that can be reasonably expected to the make sure that the personal data of Users and others are processed safely and in accordance to this Privacy Policy and the GDPR-regulation.

However, transfers of information over the internet and mobile networks can never occur without any risk, so all transfers are made on the own risk of the person transferring the data. It is important that Users also take responsibility to ensure that their data is protected. It is the responsibility of the User that their login information is kept secret.

5. TRANSFERS

The personal data collected through the Service is stored and processed inside the EU/EEA, such third country that is considered by the European Commission to have an adequate level of protection, or processed by such suppliers that have entered into such binding agreements that fully complies with the lawfulness of third country transfers (as Privacy Shield) or to other suppliers where the adequate safeguards are in order to protect the rights of the data subjects whose data is transferred. To obtain documentation regarding such adequate safeguards, contact us using the Contact details listed in 9.

We will not sell or otherwise transfer Users' personal data to third parties.

We may transfer Users' Personal Data to:

- our contractors and sub-contractors, acting as our Processors and Sub-Processors in accordance with our instructions, for the provision of the Service;
- authorities or legal advisors in case criminal or improper behaviour is suspected; and
- authorities, legal advisors or other actors, if required by us according to law or authority's injunction.

We will only transfer Users' personal data to third parties that we have confidence in. We carefully choose partners to ensure that the User's personal data is processed in accordance to current privacy legislations.

6. AGGREGATED DATA (NON-IDENTIFIABLE PERSONAL DATA)

We may share aggregated data to third parties. The aggregated data has in such instances been compiled from information that has been collected through the Service and can, for example, consist of statistics of internet traffic or the geographical location for the use of the Service. The aggregated data does not contain any information that can be used to identify individual persons and is thus not personal data.

7. COOKIES

When Users use the Service, information about the usage may be stored as cookies. Cookies are passive text files that are stored in the internet browser on the User's device, such as computer, mobile phone or tablet, when using the Service. We use cookies to improve the User's usage of the Service and to gather

information about, for example, statistics about the usage of the Service. This is done to secure, maintain and improve the Service. The information that is collected through the cookies can in some instances be personal data and is, in such instances, regulated by our Cookie Policy.

Users can at any time disable the use of cookies by changing the local settings in their devices. Disabling of cookies can affect the experience of the Service, for example disabling some functions in the Service.

8. CHANGES

We have the right to, at any time, make changes or additions to the Privacy Policy. The latest version of the Privacy Policy will always be available through the Service. A new version is considered communicated to the Users when the User has either received an email informing the User of the new version (using the e-mail stated by the User in connection to the use of the Service) or when the User is otherwise informed of the new Privacy Policy.

9. CONTACT

For questions, further information about our handling of personal data or for contact with us in other matters, please use the below stated contact details:
LEGAL@DEVTEON.COM