

# Stability International Platform Privacy Policy

# STABILITY INTERNATIONAL PLATFORM PRIVACY POLICY

#### Last amended: March 12, 2024

Here we are committed to protecting and respecting your privacy. Before you give us your consent on the collection and processing of your personal data, or provide us with your personal data within any form on our Platform, we kindly ask you to read carefully this Privacy Policy, so we can be calm that you completely understand the conditions under which we would cooperate.

This Privacy Policy explains when and why we collect personal data about you, how we use it, the conditions under which we may transfer it to others, your rights in respect of your personal data, as well as how we keep it secure. This Privacy Policy is an integral part of our Terms, the defined terms in this Policy have the same meaning as in our Terms.

We may change this Privacy Policy from time to time, so please check this page to ensure that you're happy with any changes. The additional notifications on any amendments can be sent to your email. Any questions regarding this Policy and our services should be sent to <u>office@stabilityin.com</u>.

# **1. WHAT IS STABILITY PLATFORM?**

We believe that since you chose Stability Platform for use you are familiar with the main focus of our services, and you have also of course got yourself acquainted with our Terms. We will point at it once more for better understanding of the purposes your personal information is being collected and processed according to this Privacy Policy. So, Stability Platform is an online platform, which can be used, for the purchase of tokens and educational materials, as well as managed by the company:

Stability International Platform Ltd. Registered office at Suite 1, Second Floor, Sound & Vision House, Francis Rachel Str., Victoria, Mahe, Seychelles Registration number: 238565.

# 2. WHAT IS PERSONAL DATA / PROCESSING OF PERSONAL DATA?

**Personal data** (or data) is any information relating to you and that alone or in combination with other pieces of information gives the opportunity to the person that collects and processes such information to identify you as an individual. It can be your name, your location data, email or IP address.

**Processing of the data** means any action with your personal data, for example, collection, recording, organization, structuring, storage, use, disclosure by any means and so on.

# **3. LEGAL BASIS FOR PROCESSING**

In general, we process your data based on your consent. You provide your consent by checking the appropriate box when registering your Account. However, we may process your personal data not only on the basis of your consent, but also when one of the following applies:

• processing is necessary to provide you our Services according to our Terms, which constitutes a contract between you and us;



- processing is necessary for the purposes of the legitimate interests pursued by us on the conditions prescribed by the data protection legislation;
- processing is necessary for compliance with our legal obligations;
- processing is necessary to protect your vital interests or vital interests of another natural person;
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

You will find the relevant legal basis for your personal data processing is Section 4 hereof.

# 4. WHAT DATA WE PROCESS, ON WHICH BASIS, AND WHY

#### A. Visiting our website

We do not collect any personal data during simple visits to our platform at <u>https://stabilityin.com/</u>, with the exception of data transmitted by your browser in order to enable the visit to the Platform. These include:

- IP address;
- Date and time of the request;
- Content of the request (specific page);
- Access status / HTTP status code;
- Any data quantities transmitted;
- Website from which the request originates;
- Browser and operating system.

We delete or anonymize the IP addresses of website visitors after the end of use. Anonymization means that the IP addresses are modified such that the individual details regarding personal or material circumstances can no longer be associated with an identified or identifiable natural person or may only be associated with such a person with an unreasonable expenditure of time, costs and effort.

**Legal basis and purpose.** We have a legitimate interest in the effective work of our website. The temporary storage of your IP address by the system is necessary to enable the website to be displayed to the users. For this purpose, your IP address must remain stored for the duration of the session.

#### **B.** Creating an Account

To access the Stability Platform, registration is required. For registration purposes, you shall submit us your username and email. We store your Account data as long as your Account is in use. Furthermore, we will store your country based on the transmitted IP address of your device.

In addition, to prevent abuse of our Platform for money laundering and terrorist financing purposes we implement the highest standards of Know Your Customer (KYC) and Anti Money Laundering (AML) compliance. So, we may collect the following information: photo of your passport or other identity card to show proof of identity, documentation that evidences your proof of address, name and telephone number.

**Legal basis and purpose.** We obtain your consent for this procession, which is indicated by your affirmative actions, such as filling these data in our application form and registering an Account. We process these data for creating your Account and for its maintenance, namely for user identification when using the Platform. Please note, that you are entitled to cancel your registration (delete your Account) at any time.



#### C. Contacting our support

You can contact our support by email to get in touch with us and submit questions and suggestions. For this purpose, you shall provide personal data such as username, email, the topic of your request, and your message to our support. You can also attach screenshots to clarify your request. Please note, that we collect and process these data and all other communications between us (your emails, or your responses to surveys that we send you or ask you to fill in when you're on our Platform).

**Legal basis and purpose.** Contacting our support or providing us with feedback constitutes your consent. We use these data for communication with you, analysis, and improvement of our services.

#### E. Email newsletters

We may use your email to send you newsletters with some necessary or promotional information about our Platform such as welcoming letters, security, and legal notices, announcements, Platform updates, reminders, news, promotions, suggestions, etc. Please note, that you are able to opt-out of such communications (excluding legal notices) at any time; a relevant link can be found in each newsletter.

**Legal basis and purpose.** We have legitimate interest in the effective provision of the services, as well as sending you Platform-related letters with some necessary or promotional information.

#### **G.** Cookies

Our website uses so-called cookies, that serve to make our website more user-friendly, effective and secure. Cookies are small files that are stored on your device and contain certain settings and data for interaction with our system via your browser. A distinction is generally made between two different types of cookies: Session cookies are deleted as soon as you close your browser (end of session) and temporary/ permanent cookies are stored on your data storage medium for either an extended period of time or without limitation. This storage helps us to design our Platform effectively and facilitates your use, for instance, by storing certain details about you so that you do not need to repeatedly enter them. We use the following types of cookies files when entering the Platform:

stabilityin_com_session auth_session	Used for user authentication during session
_gid (Google Analytics)	Used to distinguish visitors – register a unique ID that is used to generate statistical data on how the visitor uses the website.
_ga (Google Analytics)	Used to calculate visitor, session, and campaign data and keep track of website usage for the website's analytics report.
OTZ (Google Analytics)	Used to collect information on user behaviour which is used to optimize the website, as well as compile information on visitors for marketing purposes.
_gcl_au (Google AdSence)	Used to gather website statistics and track conversion rates.



Secure-ENID (Google)	Used to prevent fraudulent use of login data. This also contains a Google user ID which can be used for targeting purposes following a successful login.
Secure-3PSID (Google) Secure-3PSIDCC (Google)	Used for targeting purposes to build a profile of the website visitor's interests in order to show relevant and personalised Google advertising.
Secure-3PSIDTS (Google)	Used to maintain user sessions and preserve your preferences and settings across different Google services and websites.
XSRF-TOKEN	Used to prevent CSRF (Cross-Site Request Forgery) attacks and ensure user data security.
SIDCC (Google)	Used to protect a user's data from unauthorized access.
HSID (Double Click, Google)	Used to display personalized advertisements on Google websites, based on recent searches and previous interactions.
SSID, APISID, SAPISID (Youtube, Google)	Used to play YouTube videos embedded on the website. This video may collect visitor information and custom preferences.
SEARCH_SAMESITE	Used to prevent the browser from sending this cookie along with cross-site requests.
NID (Google)	Registers a unique ID that identifies a returning user's device. The ID is used for targeted ads.
AEC (Google)	Ensures that requests within a browsing session are made by the user, and not by other websites.
1P_JAR (Google Ads)	Used to gather website statistics and track conversion rates.

You can delete the cookies at any time via the s the appropriate settings of your browser. The following links might be useful for you to choose the best option of your browser:

<u>Cookie setting in Firefox</u> <u>Cookie setting in Safari – desktop and mobile devices</u>

**Cookie setting in Internet Explorer** 

**Cookie setting in Chrome** 

**Cookie setting in Opera** 



Please note, that if you turn the cookies off, you might not be able to store your preferences, and some of our pages might not display properly, since our website will no longer be personalized to you.

Legal basis and purpose. If you visited our website, cookies consent message was the first message that you were likely to see that prompted you about the fact that cookies are used and active on our Platform. In most cases we ask you about your consent to install cookies. This does not apply only to the strictly needed cookies. In addition, please note, that all your data automatically collected via cookies is further processed in a manner that does not allow your identification.

#### 5. THIRD-PARTY PROCESSING

Other users. If you registered through a URL link provided by another user within their participation in the partnership program (hereinafter referred to as "Information Sponsors"), we grant such Information Sponsors access to your personal data and other information. Specifically, we provide Information Sponsors with access to the data from your account on the Stability platform (name, surname, login, country, phone number, email), as well as information about your token accumulation: your rating, rank, purchased marketing package, smart token accumulation, your unit, key, free program, your total turnover, and your team.

General statement. In order to provide high-quality services, we cooperate with third-party services providers. We have carefully selected them with regard to compliance with the legal requirements for data protection and data security and concluded processor agreements with them, which comply with the requirements of GDPR. In all cases when we transfer your personal data to other persons, we are confident that your personal data is protected and used only for the purposes specified in this Privacy Policy. We achieve such safety by using only certified services and products, signing agreements on personal data protection, as well as taking technical measures to ensure the data is protected when stored and used, and also while being processed and transferred.

Contractors and Partners. We have contractors and partners in other countries, including those outside the European Economic Area. Your personal data may be accessed by our contractors and partners in Ukraine. The transfer of your personal data to the recipients in other countries is secured by the Standard data protection clauses adopted by the European Commission and compliant with the EU data protection laws.

Google Analytics. We use Google Analytics, an analytics service that surfaces data about user behavior on websites to analyse traffic, track and examine your use of our Platform. This service is provided by Google Inc., 1600 Amphitheater Parkway, Mountainview, California 94043, USA; Here is some information on data protection practices of Google LLC. Google is subject to the EU-US-Privacy-Shield.

Google Analytics uses cookies, and with the help of such cookies, may collect IP-addresses, the source of the traffic, information regarding the device and operation system, information about your wireless and mobile network connections, unique device identifiers, browser type, language, battery level, and time zone. Please note, that the information generated by the cookies will be transmitted to and stored by Google on servers in the United States. Google will use the information obtained by the cookies to evaluate your use of our Platform, to compile reports on user activities and to provide further services associated with the use of our Platform and the Internet.



You can configure your browser to reject cookies as stated above, or you can prevent the collection of data generated by the cookie (including your IP address) and the processing of this data by Google by downloading and installing the **browser plug-in**.

For Legal Purposes. You also have to be aware of the fact that we may disclose your personal data in order to comply with the law, applicable regulations, and government requests, or to detect, prevent, or otherwise address illegal or suspected illegal activities, security or technical issues. In other words, we may disclose information necessary for the investigation or legal process on official request or the official bodies acting within their powers.

### 6. HOW LONG WE STORE YOUR DATA

Your personal data will be stored by us no longer than is necessary for the purposes for which the personal data are processed. Generally, we store your personal data as long as your Account is active. In case you are banned or you decide to delete your Account or simply stop using it we will keep your data for an additional 12 months to ensure we have information in case there are any kinds of disputes between the Company and you, or between you and other users.

### 7. HOW WE PROTECT YOUR DATA

We have taken the best possible technical and organizational measures to ensure the information is processed in a manner that ensures appropriate security of information, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage. However, we would like to point out that online data transmission can entail security vulnerabilities. Seamless protection of data against access by third parties is not possible.

**Technical measures.** While communicating with the website, we use Hypertext Transfer Protocol Secure (HTTPS) to keep your data secured and communication encrypted. Technically the data we collect are stored in secure places such as cloud computing platform of Cloudflare. You may find the commitments to the GDPR of Cloudflare <u>here</u>.

**Organizational measures.** We require all our employees and contractors to enter in non-disclosure agreements and data processing agreements where it is required by law. We also will inform users and the respective agencies of personal data breaches should there be high risks of violation of your rights as data subjects. We would also do our best to minimize any such risks.

# 8. YOUR RIGHTS REGARDING YOUR PERSONAL DATA

Under the data protection laws you have the following rights:

- **Right of Access** You can ask us what your personal data we currently process and for what purposes. In addition, you have the right to obtain copies of your personal data.
- **Right to Rectification** You have the right to correct your personal data that you deem inaccurate. You also have the right to ask us to complete the personal data that you deem incomplete within a reasonable limit.
- **Right to Erasure (Right to be Forgotten)** You can request an erasure of your personal data if its processing is no longer needed in relation to the purposes for which they were collected, and also if there are no legitimate grounds for the processing any more.



- **Right to Restriction of Processing** Under certain circumstances as required by law, you have the right to request us to restrict the processing of your personal data. For example, if you contest the accuracy of your personal data being processed or in case the Company is not interested in processing of your personal data any longer, but you want the Company to do this on different reasons, for example, to bring some claim for somebody and, instead of the erasure of information, its processing will be just restricted.
- **Right to Object** If your personal data are processed for direct marketing purposes, you have the right to object to the processing of your personal data at any time, and those data will no longer be processed for these purposes. You can also object to the processing of your personal data under other circumstances as required by law.
- **Right to Withdraw Your Consent** You can withdraw your consent for the collection and processing of your personal data at any time by contacting us. After your request, we will process such request in a timely manner and we will no longer process your personal data unless stated otherwise under applicable laws.
- **Right to Data Portability** You have the right to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format. In addition, you have the right to request us to transmit those personal data directly to another controller (where technically feasible).

How to exercise your rights as to your personal data. Any requests to exercise your rights can be directed to us through the contact details provided below. These requests are free of charge.

**Time for replay and reaction.** We will provide information about the actions taken on your request, within one month after receiving the request. This period may be extended by two further months if we consider it necessary, considering the complexity and number of the requests. We will notify you about such renewal within one month of the receipt of the request together with the reasons for such delay.

If you have doubts as to our reply or reaction, or absence of such, you have the right to lodge a complaint with a supervisory authority that is empowered to process such complaints in your country.

# 9. ARE YOU ALREADY 18 YEARS OLD?

Here we can provide services only in case you are aged 18 or older. If you are under 18 you will need to get your parent's/guardian's permission before submission of any personal data to the Company. If you are underage, and there are no data as to your parent's/guardian's permission to use our Platform, we will not collect or process your personal data, and you will have limited use of our Platform.

# **10. BREACH NOTIFICATIONS**

If any of your personal data is under the breach, and there are high risks of violation of your rights as data subject, we will inform you and the respective data protection agencies as to the accidents without undue delay. We will do our best to minimize any such risks.



# **11. OUR CONTACT INFORMATION**

We hope this Privacy Policy helped you to understand how your personal data will be dealt here at Stability Platform. Should you have any questions regarding this Privacy Policy, please contact us at <u>office@stabilityin.com</u> or to:

Stability International Platform Ltd. Registered office at Suite 1, Second Floor, Sound & Vision House, Francis Rachel Str., Victoria, Mahe, Seychelles Registration number: 238565.

#### Your Stability Platform team

