

Last Updated: April 15, 2024

Privacy Policy

1. General Provisions and Scope of Application

1.1. This Privacy Policy (hereinafter referred to as the “Policy”) has been drafted by the LIMITED LIABILITY COMPANY “LEGAL FIRM ‘PRAVOVA DOPOMOGA’” (EDRPOU code: 41215567, address: Sichovykh Striltsiv St, 77, Kyiv, hereinafter referred to as the “Company” and/or “Data Controller”) in compliance with the current legislation of Ukraine, including but not limited to the Law of Ukraine “On Protection of Personal Data” of June 1, 2010, No. 2297-VI (as amended) and sets forth the protocols for the acquisition, collection, storage, processing, utilization, safeguarding, and disclosure of personal data (hereinafter referred to as “Data” and/or “Personal Data”) via the website: <https://pravdop.com> (hereinafter referred to as the “Website”) and/or social media platforms including Facebook, Instagram, YouTube, etc. (hereinafter referred to as “Social Media Platforms”), and/or related services and tools.

1.2. In initiating an order, the User (Buyer) provides their consent and unequivocal agreement for the processing of their personal data under the conditions and according to the procedures stipulated herein, and affirms their understanding and acceptance of this Policy, agreeing to abide by its terms.

1.3. Within this Policy, the term “Online Platform” refers collectively to the Website and Social Media Platforms.

1.4. The Data Controller for users' personal data is the LIMITED LIABILITY COMPANY “LEGAL FIRM ‘PRAVOVA DOPOMOGA’” (EDRPOU code: 41215567, address: Sichovykh Striltsiv St, 77, Kyiv).

1.5. All terms within this Policy adopt the meanings as specified under the Law of Ukraine “On Protection of Personal Data” of June 1, 2010, No. 2297-VI.

1.6. The Website and Social Media Platforms may include links to other websites (solely for informational purposes). This Policy does not extend to any such third-party websites. Therefore, the Company advises reviewing the privacy policies and personal data management practices of each website prior to submitting any personal data.

1.7. This Policy is binding for the designated official and employees of the Company directly involved in processing and/or having access to the personal data of the Website and Social Media Platform users as part of their official duties.

2. Composition and Content of Personal Data

2.1. For the purposes of this Policy, “Data” refers to any information that directly or indirectly relates to a specific User. This may include:

Names, surnames, patronymics (if applicable), telephone numbers, email addresses, message history, contents of communications between the User and the Website or Social Media Platform administrators, histories of reviews or comments, and any other communicative information that the User voluntarily provides in the registration form or during surveys (by filling out a form or through other means). It also includes information obtained during verbal interactions with the Website's administration and details provided during the payment for services.

The list of personal data is not static or universally required for all Users; it varies based on the User's needs and preferences, and the activities they engage in on the Website or Social Media Platforms.

Additionally, Data encompasses other information lawfully obtained from third parties and/or sourced from User profiles on the Website or Social Media Platforms. In such instances, the User consents to the processing of information that is available from these accounts (profiles) on Social Media Platforms.

2.2. Users bear responsibility for all information they post on public accounts. Users must be aware of the risks associated with disclosing their address or precise location details. If a User opts to access the Online Platform using a third-party authentication service, such as information from Facebook, the Company may receive additional profile or other information provided by such third party.

3. Purposes, Boundaries, Legal Bases, and Duration of Personal Data Processing

3.1. The purposes of processing personal data include:

- Facilitating the execution of civil, commercial, and tax relations, and fulfilling the functions, authorities, powers, and duties assigned to the Company in accordance with Ukrainian law;
- Identifying the client as a User of the Website or Social Media Platform for the purposes of communication, which includes service provision, processing payments, conducting transactions, submitting reports, managing financial and administrative accounting, developing and executing bonus and loyalty programs, and dispatching mailings by post, email, or phone. This includes sending commercial offers, promotions, and news updates. It also covers providing legal and other services offered by third parties and/or partners of the Company, aiming to enhance service quality, develop offer ratings, analyze user activities, manage website traffic, and predict and analyze user preferences and interests to tailor the most relevant and beneficial personal or promotional offers;
- Conducting research and analytical activities, sending informational and marketing newsletters (company news, promotions, information about promotions, promo codes, and discounts, personal recommendations, personal discounts, and offers) containing information about goods and/or services, advertising, and commercial offers for such goods and/or services, etc;
- Sending newsletters, commercial offers, messages about promotions, loyalty programs, bonus programs, and/or messages about the functioning of the Website via mail, email, phone, by sending informational messages and alerts in messengers. The User may opt out of receiving informational and promotional mailings at any time;
- Complying with other legal obligations imposed on the Data Controller in order to protect the legitimate interests of the data owner or a third party who receives the personal data.

3.2. The legal basis for processing the personal data of Users of the Website and/or Social Media Platforms is the User's consent, which is expressed through the use of the Website and/or Social Media Platforms.

3.3. The Company refrains from processing data related to racial or ethnic origin, political opinions, religious or other beliefs, or trade union membership. Likewise, the Company does not process data that characterizes the physiological features of users which could be used to establish their identity.

3.4. User personal data is processed for an indefinite period through any lawful means, including within data information systems with or without automation tools. The duration for which the data is processed and stored is determined based on the objectives of the data processing activities, as well as the terms specified in agreements with Users in compliance with applicable Ukrainian legislation. Personal data is processed and stored only as long as necessary to fulfill the purposes outlined in section 3.1 of this Policy.

Furthermore, Users are entitled to request the cessation of their personal data processing and storage, or to have their data deleted. A formal request to stop processing and storing personal data will result in the immediate cessation and deletion of such data by the data controller.

3.5. At any time, Users can alter or delete their personal information, unsubscribe from newsletters, or withdraw their consent to data processing.

For inquiries about the grounds, conditions, or procedures for changing or deleting personal data, please contact the official Website email at pravdop.client@gmail.com, using "Personal Data" as the subject of your email.

4. Location of Personal Data

4.1. The personal data of Users of the Website and/or Social Media Platforms are processed and protected on the Company's secure Google Drives.

5. Conditions for Disclosing Personal Data to Third Parties

5.1. The Company is permitted to share data with its affiliated entities (entities that are united by common ownership). These affiliates may process and use the data strictly for the purposes outlined in this Policy.

5.2. Personal data is disclosed when a User submits an order for services on the Website or through Social Media Platforms. The data shared with vendors is limited to what is necessary for identifying the User, fulfilling, and processing the User's order. This includes facilitating accurate payment for services and ensuring the delivery of financial, legal, and other related services.

5.3. The Company may engage third-party service providers to fulfill orders. In such cases, these third-party service providers are not authorized to use the personal data obtained via the Website or Social Media Platforms for any purposes other than fulfilling the order.

5.4. The Company may share specific anonymized data, as well as allow the collection of such depersonalized information directly on the Website or social media platforms using relevant technologies. This data, which does not enable individual identification of Users, may be provided to third-party service providers, trusted partners, or authorized researchers. The purposes of sharing this information include conducting marketing research, enhancing the effectiveness of advertising offers and campaigns by making them more relevant, undertaking analytical activities, gaining a better understanding of which advertisements and/or services may interest users, and improving the overall quality and effectiveness of the products/services provided on the Website or Social Media Platform, etc.

5.5. The Company processes data on a lawful and equitable basis:

Data is not disclosed to third parties or disseminated without the User's consent, except in cases required by the current laws of Ukraine, and only if it serves the interests of national security, economic welfare, and human rights. This includes, but is not limited to:

- responding to justified requests from governmental authorities that have the legal right to demand and receive such data;

- for purposes related to the prevention of fraud and abuse on the Website and/or Social Media Platform.

5.7. In instances where personal data is transferred as outlined in Section 5 of this Policy, the decision to inform the user about the transfer of their personal data remains at the discretion of the Company.

6. Protection of Personal Data

6.1. The data collector employs system and software technologies and communications means that prevent the loss, theft, unauthorized destruction, distortion, forgery, and copying of information, all compliant with international and national standards.

6.2. Employees/authorized personnel who are directly involved in processing or have access to personal data, as part of their official duties, are obligated to comply with Ukrainian data protection laws and the company's internal policies regarding data processing and protection.

6.3. Employees/authorized personnel with access to personal data, especially those responsible for processing, must not disclose any personal data entrusted to them or that they become aware of during their professional, official, or employment duties. This confidentiality obligation persists even after their engagement with personal data ends, except in cases stipulated by law.

6.4. Personal data should not be retained for longer than is necessary for the purposes for which it was collected and processed, and in any case, not beyond the retention period specified in this Policy and agreed upon by the User.

6.5. The data collector has established and implemented internal rules for managing personal data. These rules include procedures for deleting certain data after the termination of cooperation with a User, defining access levels for the company's employees to user data, and a secure protocol for the internal exchange of such data. The company routinely conducts security system audits to identify potential improvements in the secure storage and handling of user data. Furthermore, the company complies with the Standard Procedure for Personal Data Processing approved by the order of the Verkhovna Rada of Ukraine on January 8, 2014, No. 1/02-14 (available at https://zakon.rada.gov.ua/laws/show/v1_02715-14#Text), to the extent that it applies specifically to personal data.

7. Rights of the User (Personal Data Subject)

7.1. Personal data subjects (Users) have the right to:

- Know the location of the database containing their personal data, its purpose and designation, the location and/or residence of its owner, or manager, or to authorize someone to retrieve this information, except in cases restricted by law;
- Obtain information about the terms of access to personal data, including details of any third parties to whom their data is disclosed;
- Access their own personal data;
- Control the messaging process via settings on the Website;
- Receive a response within thirty calendar days from the request date, except as limited by law, on whether their personal data is being stored and to review the stored data;

- Issue a reasoned objection to the processing of their personal data by state or local authorities within the scope of their legal powers;
- Protect their personal data from unlawful processing and from accidental loss, destruction, damage due to deliberate concealment, failure to provide, or delayed provision, as well as from the disclosure of misleading or defamatory information that could harm the honor, dignity, and business reputation of an individual;
- Address issues regarding the protection of their rights concerning personal data to state authorities, and local government bodies, whose powers include the protection of personal data;
- Use legal measures in case of breaches in personal data protection laws;
- Right to request that the processing of their personal data be ceased and that the data be deleted by the Company.

8. Procedure for Handling Requests from Personal Data Subjects (Users)

8.1. Personal data subjects (Users) are entitled to request information about themselves from any entity involved with personal data, without specifying the reason for their request, except in cases restricted by law.

8.2. Personal data subjects (Users) have the right to access their data free of charge.

8.3. Personal data subjects (Users) may submit a request for access (hereinafter the “Request”) to their personal data to the data controller.

The request should include:

- the subject's surname, first name, patronymic, residence (place of stay), and details of an identity document of the personal data subjects (Users);
- other information that identifies the personal data subject (User);
- details concerning the specific personal data being requested, or information about the data owner or manager;
- a list of the personal data items being requested.

8.4. The review period for the request should not exceed ten working days from the date it is received.

8.5. Within this period, the Data Controller will inform the personal data subject (User) whether the request will be granted or if certain personal data cannot be provided, citing the legal basis for this decision as outlined in the applicable regulatory act.

8.6. The request should be fulfilled within thirty calendar days of its receipt, unless otherwise specified by law.

9. User Personal Data Deletion

9.1. User personal data may be deleted at the user's request by sending a written request to cease processing personal data via email to pravdop.client@gmail.com with “Personal Data” as the subject line.

9.2. User personal data is deleted or destroyed in compliance with legal requirements. In addition to requests made under 9.1, personal data must also be deleted in the following circumstances:

- Upon issuance of a directive by the Ukrainian Parliament Commissioner for Human Rights (hereafter referred to as the Commissioner) or by designated officials within the Commissioner’s Secretariat;

- When a court's decision that mandates the deletion or destruction of personal data becomes legally binding.

9.3. The destruction of user personal data is carried out in such a way that it permanently prevents any possibility of restoring the personal data or identifying the User.

10. Amendments to the Policy

10.1. The Company may periodically make unilateral updates to this Policy without prior notification to the User. The revised version of the Policy will take effect immediately upon its posting on the Website, unless otherwise specified in the updated Policy.

10.2. If the User disagrees with any changes to the Policy, they must stop using the Website and/or Social Media Platform. Continuing to use the Website and/or Social Media Platform after such changes are implemented serves as the User's agreement to and acceptance of the updated Policy.

User Agreement

The following text of the User Agreement (hereinafter referred to as the “Agreement”), addressed to an unspecified group of individuals, visitors to the website <https://pravdop.com/ru> (hereinafter referred to as the “Website”) and/or social media platforms such as Facebook, Instagram, YouTube, etc. (hereinafter referred to as “Social Media Platforms”), and/or other services, using the services, placing orders, correspondence, phone conversations, and leaving reviews.

This Agreement constitutes a public offer as defined by current Ukrainian legislation. Any conclusive actions taken by individuals (hereafter referred to as the “User” or “Buyer” for individuals, and “Users” or “Buyers” for groups), that are aimed at using the Website and/or Social Media Platform, constitute an unconditional acceptance of all terms of this Agreement. By accepting the Agreement, the User acknowledges that this acceptance is as legally binding as physically signing the Agreement on the terms outlined herein. Should any part of this User Agreement be declared invalid or unenforceable, the remaining parts shall continue to be in force.

This User Agreement sets forth the general terms for the formation and acceptance of orders, as well as the marketing interactions between the User and the Website, etc.

If you, as a User, disagree with this User Agreement, you must refrain from using the Website and/or Social Media Platforms. It is advisable to review this Agreement periodically, as any amendments signal your acceptance of those changes from the moment they are implemented.

By consenting to this Agreement, you authorize the processing and protection of your personal data according to the specifications outlined in the Privacy Policy (hereinafter referred to as the “Policy” or “Privacy Policy”).

We respect the User's right to privacy and the confidentiality of their personal information. This User Agreement applies to all users of our Website and Social Media Platforms and governs the collection and use of personal information that may be requested/received during visits to the Website and/or Social Media Platform, during ordering, correspondence, telephone conversations, or any other communication involving data/information exchange. If the User has any questions or concerns about privacy, or if they wish to withdraw their consent to the use of their personal data, they may send an email with “Personal Data” in the subject line to pravdop.client@gmail.com

CONTACTING THE ONLINE PLATFORM

You can contact the Online Platform through the following means:

- By email at pravdop.client@gmail.com
- Through the online chat feature available on the website

You may send inquiries via email or online chat at any time. However, these inquiries will be processed only on business days.

USER PERSONAL DATA

When Users place orders or interact with the Website in other ways, the Website collects both personal and general information, as detailed in our Privacy Policy. Viewing the Website and accessing its content does not require registration or the provision of such information.

To order services or interact with the Website in any other capacity, you must thoroughly familiarize yourself with your rights and obligations regarding personal data processing as outlined in Article 8 of Ukraine's Law on Personal Data Protection, as well as our Privacy Policy. It is essential that you read and fully agree to the terms of both this User Agreement and the Privacy Policy before proceeding.

If you disagree with any terms of this User Agreement or the Privacy Policy, please refrain from submitting any personal information (personal data).

THIRD-PARTY SERVICE PROVIDERS

For the execution and delivery of orders, consumer support, data analysis, and additional services, the User consents for the website and the LIMITED LIABILITY COMPANY "LEGAL FIRM 'PRAVOVA DOPOMOGA'" to utilize third-party services. The User's personal data may be transferred to these third parties for processing strictly in accordance with the terms outlined in the User Agreement and the Privacy Policy.

INFORMATION DISCLOSURE AND TRANSFER

Details regarding the disclosure of personal data to third parties are specified in the Privacy Policy.

COOKIE POLICY

As with many other companies, we use cookies on our Website and across our Social Media Platforms. Cookies are small data files that our Website and Social Media Platforms send to User's hard drive to store information relevant to their interactions with the Website and Social Media Platform. This technology enhances User's online experience by remembering their preferences on the specific website. Importantly, cookies do not contain personal information, nor can they manipulate User's system or read data from their hard drive.

When you browse the Website or use Social Media Platforms, we may place cookies on your computer. Temporary cookies are used to count the number of visits to our Website and/or Social Media Platform and are deleted when you close your browser. Permanent cookies may be stored on your computer by your browser. Upon registration, these cookies indicate whether it is your first visit or if you have visited our Website and/or Social Media Platform before. Cookies contain no personal data and can be blocked at any time. Cookies do not collect personal information about you, do not provide us with your contact

information, and do not access any information from your computer. We use cookies to identify features of the Website and/or Social Media Platform and offers that you may find most appealing in order to provide more relevant information to you. Additionally, cookies are used to make the Website and Social Media Platforms secure, protected, and user-friendly. Cookies support security features and their activation.

Cookies also enable us to track any breaches of the User Agreement by visitors or devices. They help assess the number and frequency of requests and identify and block visitors or devices attempting to perform bulk downloads of information from the Website and/or Social Media Platform.

Remember, cookies allow you to fully utilize all the features of the Website and/or Social Media Platform, and we recommend keeping them enabled for the best experience.

Additionally, the Website and Social Media Platforms may feature links to other websites not managed by the LIMITED LIABILITY COMPANY “LEGAL FIRM ‘PRAVOVA DOPOMOGA’”. These links are provided solely for informational purposes. Note that when you follow links to these external websites, this Privacy Policy and User Agreement no longer apply.

The technical setup of the Website pages may include modules from Facebook, Twitter, YouTube (youtube.com), Google, Telegram, Instagram, Viber, and WhatsApp.

These modules can function as buttons to sync your account on the Website and/or Social Media Platforms, to retweet, or to 'Like'. If a visitor accesses a webpage equipped with such a plugin, their internet browser will directly connect to the servers of Facebook, Twitter, LinkedIn, Google+, YouTube, Telegram, Instagram, Viber, and WhatsApp. The plugin transmits data about which web pages of the Website the visitor has viewed. If any functions of the plugin are used, this information will also be synchronized with the visitor's account on Facebook, Twitter, Google+, YouTube, Telegram, Instagram, Viber, and WhatsApp. For more detailed information about how social media platforms like Facebook, Twitter, Google+, YouTube, Telegram, Instagram, Viber, and WhatsApp collect and use data, as well as your rights and options for protecting your personal data in this context, please review the privacy policies on the websites of Facebook, Twitter, LinkedIn, Google+, YouTube, Telegram, Instagram, Viber, and WhatsApp.

MEDIA AND COMMUNICATIONS

By using the Website and/or Social Media Platforms, users consent to verification calls for orders, quality assessment of services provided, and electronic messages through emails and messaging apps, including but not limited to Viber, Telegram, and WhatsApp. Users also agree to accept phone calls and push notifications concerning service quality, along with marketing newsletters, informational updates, and surveys designed to evaluate service effectiveness and conduct analytical studies. Additionally, users have the right to publish reviews about the services they have received.

PRICING AND SERVICES

The details and prices of services listed on the Website and/or Social Media Platforms are subject to change. The total cost of an order may vary depending on the price, quantity, and specific characteristics of the service. The final price is confirmed in the invoice or other relevant documents provided to the client (or their representative) upon receipt or ordering of the service.

ORDER PROCESSING

Before proceeding with an Order, Users are required to review and adhere to the terms outlined in this Agreement.